

Slavery And Human Trafficking Statement - 2018

This statement is published on behalf of DLA Piper International LLP and DLA Piper UK LLP pursuant to Section 54(1) of the Modern Slavery Act 2015. References to "DLA Piper," "we," "us," "our" or the "firm" are to these named entities

Introduction

DLA Piper is committed to the highest standards of professionalism, ethical behavior and integrity in everything we do and to contributing to the wellbeing of communities around the world, and has a zero tolerance approach to all human rights abuses. In this we are committed to opposing modern slavery in all its forms, and we do not tolerate it either within our business itself or within our supply chain.

Our organization structure

DLA Piper International LLP and DLA Piper UK LLP are part of DLA Piper, a global law firm operating through a number of separately constituted and regulated legal entities which provide legal and other client services in accordance with the relevant laws of the jurisdictions in which they respectively operate. Further information about the DLA Piper global law firm can be found on our website by [clicking here](#).

DLA Piper is a professional services business, which predominantly employs professionally qualified and highly skilled people.

Our supply chain consists of goods and services procured to enable our people to deliver these services. Our relationships with sub-contractors, suppliers and their employees, business partners, agents and others working on their behalf (collectively "Third Parties") principally include professional services and consultancy, property, facilities management, human resources, information technology and marketing.



Our policies

In 2018 the firm refreshed and relaunched its core values following a firm-wide consultation. We are committed to adhering to the following core values in all our dealings with our clients, our people and our communities:

- Be supportive;
- Be collaborative;
- Be bold; and
- Be exceptional.

Our policy framework includes a range of policies that outline our commitment to the identification and prevention of modern slavery in our business. These include:

- **Human Rights & Modern Slavery Policy:** Makes explicit our commitment to the United Nations Guiding Principles on Business and Human Rights, endorsed by the International Bar Association. This Policy confirms our commitment to respect and support international human rights, and in particular to the International Bill of Rights and the International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work.
- **Diversity and inclusion policy:** Encourages all our people to value diversity and respect each person's individuality, and to ensure that no partner, employee, agency worker, contractor, self-employed consultant,

job applicant or ex-employee, client or third party receives less favorable treatment on the basis of color, race, nationality, ethnic or national origins, sexuality or gender, disability, age or religion or belief.

- **Ethics policy:** Embodies the key ethical obligations of the firm and our people and is pervasive in everything we do and in all our dealings, whether directly related to the provision of legal services or otherwise.
- **Whistleblowing policy:** Offers individuals a confidential mechanism for disclosing suspicions or knowledge of possible impropriety to protect the firm, its brand, people and clients by delivering an early warning when something goes wrong. This includes matters pertaining to our supply chain which would include modern slavery.
- **Incident reporting policy:** Offers individuals a mechanism for reporting breaches of firm policies and procedures, and errors, acts or omissions which result in breach of the legal or regulatory obligations of individuals or the firm. All our people have a personal obligation to report such incidents promptly and honestly when identified.
- **Anti-bribery and corruption policy:** Setting out the firm's rules and what is expected of all our people. We expect the same

standard of conduct from the firm's contractors and third-party service providers in all dealings on our behalf.

- **Sustainable Procurement Policy:** Aligns with the Universal Declaration of Human Rights; UN Global Compact Ten Principles; UN Guiding Principles on Business and Human Rights and the Fundamental Conventions of the ILO. This policy, which includes an Ethical Code of Conduct, sets our expectations of third parties providing goods and services to DLA Piper.

We comply with all applicable employment law relating to employee terms and conditions, including pay, and have been accredited as a Living Wage Employer by the Living Wage Foundation.

The firm is committed to addressing the health and wellbeing of our people and provides access to support, delivered internally and by independent third-party providers, that provide free and confidential advice and assistance on matters which includes workplace concerns or issues.

Strategy, Supply Chain Due Diligence and Risk Areas

Our modern slavery strategy and due diligence process is developed and reviewed by a cross-functional team, including our Procurement, Property and Workplace, Responsible Business, Risk and Compliance teams to ensure that we take a coordinated approach across the firm.

DLA Piper expects our suppliers to adopt the same high standards that we adhere to and have fair employment practices. These standards are reflected in our Sustainable Procurement Policy and Ethical Code of Conduct with which we expect our suppliers to comply. The Ethical Code of Conduct specifically deals with instances of modern slavery by including, amongst other things, that our suppliers ensure that employment with them is freely chosen, child labor shall not be used, living wages are paid and working hours are not excessive.

In order to identify and assess any actual or potential involvement in modern slavery in our supply chain, we categorize suppliers, including according to factors that might indicate a high risk of modern slavery such as the location from which services are provided or goods are manufactured and the sectors or activities which present a high risk of modern slavery.

We draw on internal and independent external human rights expertise and carry out meaningful consultation with relevant stakeholders. We continue to build on this process to gain further visibility into our supply chain, including by regular review of our data sets.

Again this year, our principal third-party suppliers continue to be businesses which supply services related to the running of our premises (such as cleaners, caterers and security), and supply of the stationery and consumables needed to deliver our legal services to clients. We continue to develop our due diligence, engagement and tracking processes with these suppliers, including in relation to modern slavery and other responsible business conduct issues, such as diversity and environmental sustainability.

We have identified that the parts of our business and supply chain that carry a potential risk of modern slavery are predominantly those which involve suppliers providing goods and services outside the UK. The steps we are taking to assess and manage these risks are outlined in this statement. We have undertaken and will continue to update such assessments and steps on an annual basis.

Our standard contract terms contain a clause by which we ask suppliers to commit to respecting and supporting international human rights and undertake that they will comply with their obligations under the Modern Slavery Act or any other similar legislation. We also reserve the right to terminate agreements with immediate effect when the supplier commits a material breach.

DLA Piper also has formal relationships with other law firms around the world in countries where the DLA Piper global law firm does not have an office. These relationship firms are not part of the DLA Piper global law firm (see our organization structure above) but details about them can be found on our website by [clicking here](#). Due diligence was undertaken on these firms prior to the relationships being formalized, and all are regulated professional firms in the countries where they do business who are committed to high ethical standards under the various agreements between them and DLA Piper.

DLA Piper has a whistleblowing facility that provides a confidential mechanism for individuals to disclose suspicions of impropriety.

Performance indicators

Our cross-functional modern slavery team has held quarterly meetings to ensure progress in implementing our strategy and continuous review of priorities and performance.

In relation to modern slavery, we have begun integrating findings from our assessment, referenced above, across internal functions and

processes. This includes by raising awareness and understanding of potential risks and how to manage those risks across relevant business functions, focusing on individuals with procurement responsibilities.

In relation to supplier engagement, the frequency of these meetings is dictated by a number of factors,

including consideration of the risks posed by involvement in modern slavery. Our standard contract terms contain a contractual right to audit our suppliers. We also receive independent feedback on our performance from certain key clients who audit their relationship with us as their suppliers.

Training

During the last 12 months we have continued to develop and deliver appropriate training and capacity building on modern slavery risk to:

- Individuals within the firm who are responsible for procuring goods and services and managing suppliers;
- Local contract owners; and
- Our staff more widely.

Responsible Business

At DLA Piper we are committed to contributing to the wellbeing of communities around the world. We encourage our lawyers to do pro bono work that is meaningful, impactful and supports those in need. Our lawyers work with individuals, NGOs and intergovernmental organizations to support access to justice and the protection and promotion of the rule of law around the world.

New Perimeter, our non-profit foundation, provides pro bono legal assistance in under-served regions across the globe to support social and economic development and sound legal institutions.

We are proud to be one of the first law firms subscribing to the United Nations Global Compact (UNGC). As part of our commitment to the UNGC we produce an annual

'Communication on Progress' against the UN Global Compact ten universal principles and broader UN development goals, the latest published version can be found on our website by clicking here.

Board approval

The DLA Piper Board approved this statement on behalf of the members on 22 November 2018.

Simon Levine, Managing Partner

