

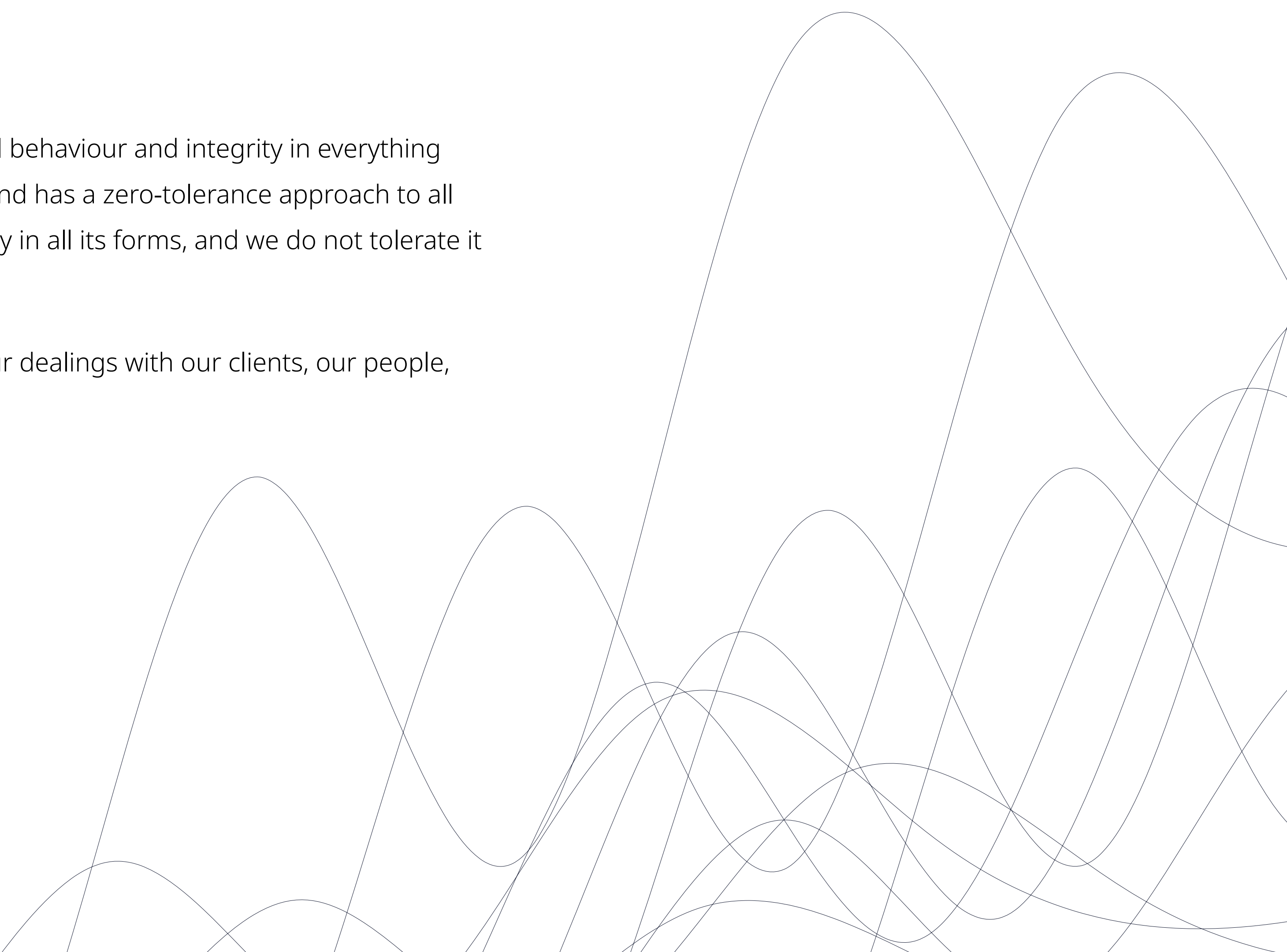
# The UK – Slavery and Human Trafficking Statement 2023

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 in respect of the financial year ended 30 April 2023. 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 behaviour and integrity in everything we do, 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 or within our supply chain.

As a firm, we're 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
  - Be exceptional
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# Our organisation structure and supply chain

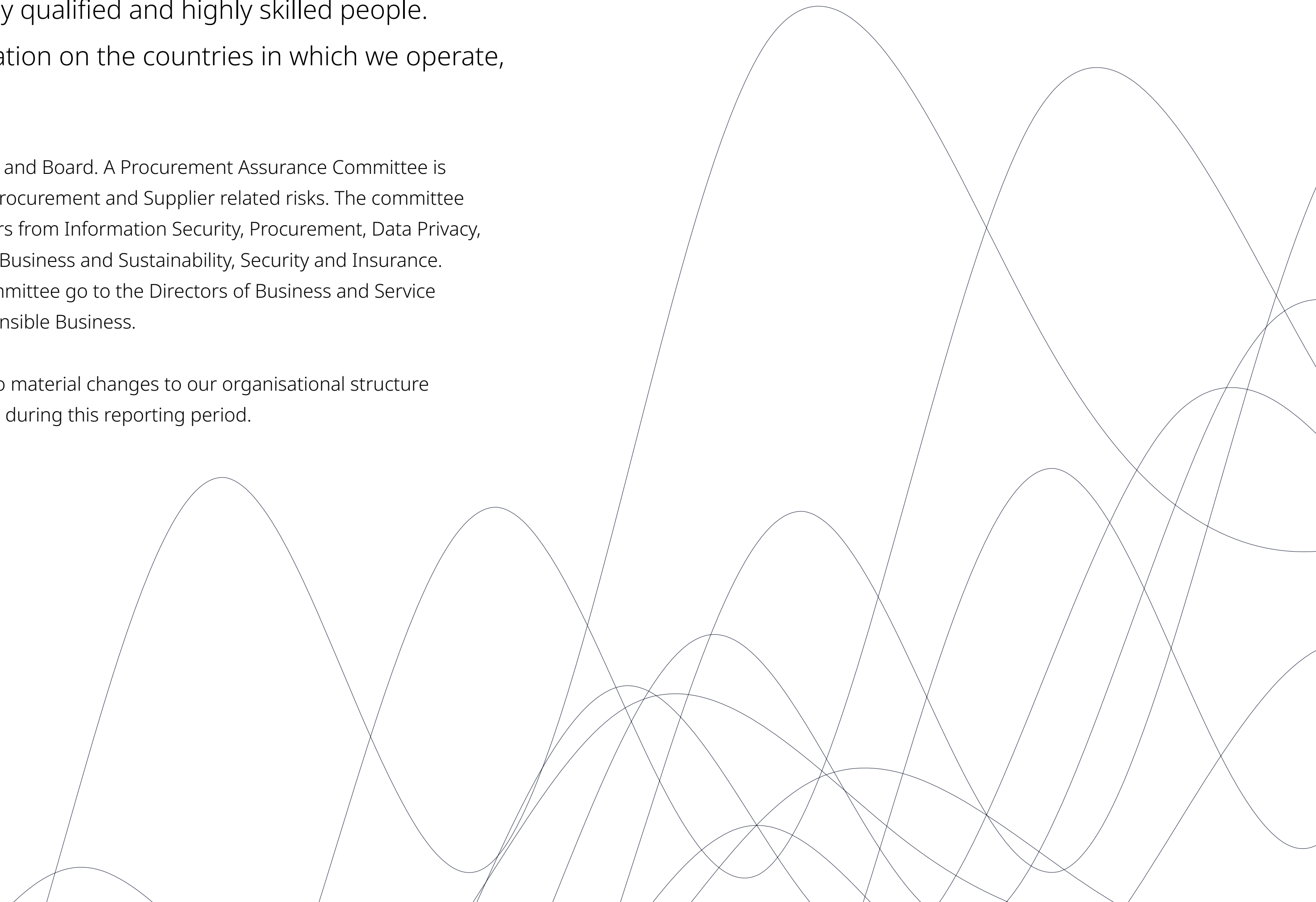
DLA Piper International LLP and DLA Piper UK LLP are part of DLA Piper, a global law firm operating through a number of separately constituted and regulated legal entities which provide legal and other client services in accordance with the relevant laws of the jurisdictions in which they respectively operate. DLA Piper is a professional services business which predominantly employs professionally qualified and highly skilled people. Further information about the DLA Piper global law firm, including information on the countries in which we operate, can be found on our website [here](#).

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 anti-modern slavery strategy and diligence processes are developed and reviewed by a cross-functional Sustainable Procurement Working Group, including representatives from our Procurement, Property and Workplace, Responsible Business, and Office of the General Counsel teams. The Working Group is sponsored by our Chief Operating Officer and is accountable to

the firm’s Executive and Board. A Procurement Assurance Committee is in place to review Procurement and Supplier related risks. The committee consists of members from Information Security, Procurement, Data Privacy, Legal, Responsible Business and Sustainability, Security and Insurance. Outputs of the Committee go to the Directors of Business and Service Delivery and Responsible Business.

There have been no material changes to our organisational structure or our supply chain during this reporting period.



# Our policies in relation to slavery and human trafficking

Our policy framework includes a range of People and Procurement policies that outline our commitment to preventing modern slavery and human trafficking risks in our business and supply chain. Relevant policies include:

- Human Rights and 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.
- International Inclusion Guidelines:** encourages all our people to value diversity, actively promote inclusion, respect each person's individuality, and to ensure that no partner, employee, agency worker, contractor or self-employed consultant receives less favourable treatment on the basis of colour, race, nationality, ethnic or national origins, sexuality or gender, disability, age or religion or belief. Our International Inclusion Guidelines are further supported by relevant country level policies.
- Ethics Policy:** embodies the key ethical obligations of the firm and our people. It 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 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:** sets 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.
- Anti-facilitation of tax evasion Policy:** sets out the firm's commitment that it will not engage in tax evasion or the facilitation of tax evasion and articulates the role and responsibility all our people have in preventing tax evasion and its facilitation. Where appropriate, suppliers are required to adopt the same standard of conduct when acting on the firm's behalf.
- Sustainable Procurement Policy:** outlines the firm's approach to integrating the management of environmental, social and economic issues into our procurement management systems. The 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 has been updated to align more closely with ISO 20400 sustainable procurement standards and is published on our external website, [further information here](#).
- Supplier Code of Conduct:** sets out our expectations of third parties providing goods and services to DLA Piper. It is aligned 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 is published on our external website, [further information here](#).

All of these policies have been made available to all of our people on our intranet.

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

Our international health and wellbeing strategy is overseen by an International Steering Committee made up of leaders from across the firm. The committee is sponsored by the Executive and supported by an international working group with representation from all regions, ensuring we take cultural differences into consideration when setting our approach.

Our vision is to create a firmwide culture where work and great health and wellbeing go hand in hand. Our refreshed health and wellbeing strategy has four key pillars: physical, emotional, social and financial health, and focusses on three key areas:

- **Promoting greater wellbeing at work for all:** we raise awareness of wellbeing issues to help reduce stigma and make it easier for our people to reach out for help. We encourage open discussions about health and wellbeing in the workplace and have resources and policies in place to support. As signatories of the Mindful Business Charter, we encourage sustainable working practices. We run internal campaigns and hold mental health events that shine a spotlight on the experiences of our people.
- **Providing support and care for our colleagues:** to ensure all our people are supported, we work to embed a diverse variety of resources, skills and good health and wellbeing practices throughout our firm. We do this through initiatives such as our SPEAK Ambassador Programme, which aims to create an environment where colleagues feel comfortable talking about mental health issues in the workplace. With MyCare, our international EAP service, we provide a range of free, confidential health and wellbeing services for our people and their families. Through digital tools such as Unmind we empower people to take responsibility for their own wellbeing.

- **Preventing health and wellbeing issues:** as well as providing reactive support, we're committed to preventing health and wellbeing issues before they happen. This includes using internal data to understand and track the different needs of our colleagues, ensuring that health and wellbeing considerations are embedded in key business processes, and introducing policies and guidelines (such as WorkSmartFlex) to help colleagues find the right work/life balance. We work with clients and across professional and regulatory bodies to collectively identify health and wellbeing issues in our industry and explore new ways of working to address them.

The "New Deal," introduced in 2022, has been further embedded. It offers our people more flexibility in how and where they work, meaningful recognition and feedback, and investment in careers and ambitions.

This is being delivered under three principles: we trust you, we value you, and we invest in you.



# Strategy and supply chain due diligence

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 the policies we share with our suppliers and ask them to commit to as part of a tender process. They include our Human Rights and Modern Slavery Policy and Sustainable Procurement Policy and specifically deal with modern slavery by including, among other things, that our suppliers ensure that employment is freely chosen, child labour is not used, living wages are paid and working hours are not excessive.

In the last 12 months we have:

- Refreshed our supplier segmentation tool and carried out risk and impact assessment to assess the criticality of our suppliers and the potential risks they pose to the firm, which includes considering environmental and social risks. Suppliers identified as critical will be reassessed annually or where a significant change in service occurs which may affect the risk profile. The output of this assessment informs the level of the Supplier Relationship Management Framework (Total SRM) that needs to be adopted to manage and build relationships with our suppliers;
- Embedded the International Procurement Policy, which clearly defines the procurement processes for purchasing goods and services depending on the risk and value. This includes completing the Due Diligence Questionnaire where specified spend and risk thresholds are met which contain questions on modern slavery. Responses to this Questionnaire are considered in decisions on whether or not to accept a supplier;
- Implemented a Supplier Management Tool which enables us to collate, and report on, better data insights on our Supply Chain, including potential ESG risks, credit reporting with monitoring capabilities and PEP and Sanction checks.
- Commissioned a Procurement Assurance Committee to monitor any identified third-party risks, and regularly review supplier policies and processes to ensure they remain fit for purpose;
- When appropriate, used standardised supplier contract templates, in which consideration of Modern Slavery risk and mitigations have been embedded and/or ensure that our Customer Policies schedule (including Modern Slavery Policy) is attached to suppliers' agreements;
- Embedded the firm's Anti Bribery and Corruption policy and procedure, rolled out training, which is mandatory for all our people, and implemented an online system for managing gifts and hospitality. This includes tools to mitigate bribery and corruption risk in our supply chains. Refresher training will be rolled out to all staff in 2023/24;
- Developed and further embedded the firm's whistleblowing policy, procedure, and processes, and promoted use of the third-party-supported Whistleblowing portal. The portal is available to both internal and external stakeholders. Whistle-blowers using this service can choose to remain anonymous. Training will be rolled out to all our people in 2023/24; and

- Rolled out Contract Management Training Programme for everyone involved in procurement of goods and services internationally and/or locally which focuses on aspects such as data protection, governance, regulatory compliance and DLA Piper Policies.

The objective is to equip the firm to mitigate potential risks throughout the supplier engagement lifecycle from onboarding through to performance improvement. We continue to gain further visibility across our supply chain, regularly review our data sets and risk register and ensure the continuous improvement of our approach to supply chain and modern slavery risk management.

The Sustainable Procurement Working Group's workplan for 2023/2024 will concentrate on further refining human rights risk management processes within the firm's new supplier management tool.

Over the coming 12 months there will be a continued focus to improve identifying Supplier risks earlier and proactively throughout the entire lifecycle of the Supplier. This will begin with reviewing how new Suppliers are selected and onboarded by the firm to deliver a consistent approach that aligns to our expectations.

# Risk assessment and management

Our primary method of assessing and addressing the risk of modern slavery across our reporting entities is through a supply chain ESG risk assessment. The assessment is risk based and targeted to identify “higher risk” suppliers. We also assess and manage the risk of modern slavery pre-contract with each supplier, and on an ongoing basis during contract management and review:

- Pre-contract: As part of our Supplier Management Platform roll out, our suppliers will be screened against various country rating areas including Global Slavery Index. Also, depending on the spend and risk threshold, suppliers will be issued with the Engagement Form and Due Diligence Questionnaire, which includes questions designed to identify modern slavery risk and establish what measures potential suppliers have in place. This information is used to decide what mitigating measures are required to manage our risk.
- Contract management and review: 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 as well as any of our policies that are shared with them. We also reserve the right to terminate agreements with immediate effect when the supplier commits a material breach.
- risk screening and diligence procedures to identify and monitor the risk of modern slavery;
- corrective action plans to investigate, respond to and mitigate any identified risk of modern slavery;
- training on modern slavery risk identification and management; and
- a reporting and/or whistleblowing mechanism for personnel and third parties to report any actual or suspected risk of modern slavery.

Where relevant, we also require that some suppliers pass these commitments down to their own suppliers and subcontractors.

In relation to supplier engagement, the frequency of meetings is dictated by a number of factors, including consideration of the risks posed by involvement in modern slavery. Where possible and appropriate, we include in our contracts 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.

For contracts where risk of modern slavery is heightened, we will include requirements for our suppliers to have in place:

- a policy commitment prohibiting the use of modern slavery that is approved at board or senior-management level and which sets out its expectations on personnel and suppliers/subcontractors;

Through ongoing supplier management routines, supplier engagement, and at break points such as contract renewal, the effectiveness of the steps taken to mitigate risk are re-assessed and changed or enhanced where necessary.

There have been no material changes to our principal third-party suppliers, who continue to be businesses which supply services related to the running of our premises (such as landlords, business managers, cleaners, caterers, and security) and supply of the IT equipment, stationery and consumables needed to deliver our legal services to clients.

Similarly, those areas of our business and supply chain that carry a potential risk of modern slavery remain predominantly those which involve suppliers providing goods and services outside the UK, specifically Africa, the Middle East, and Southeast Asia.

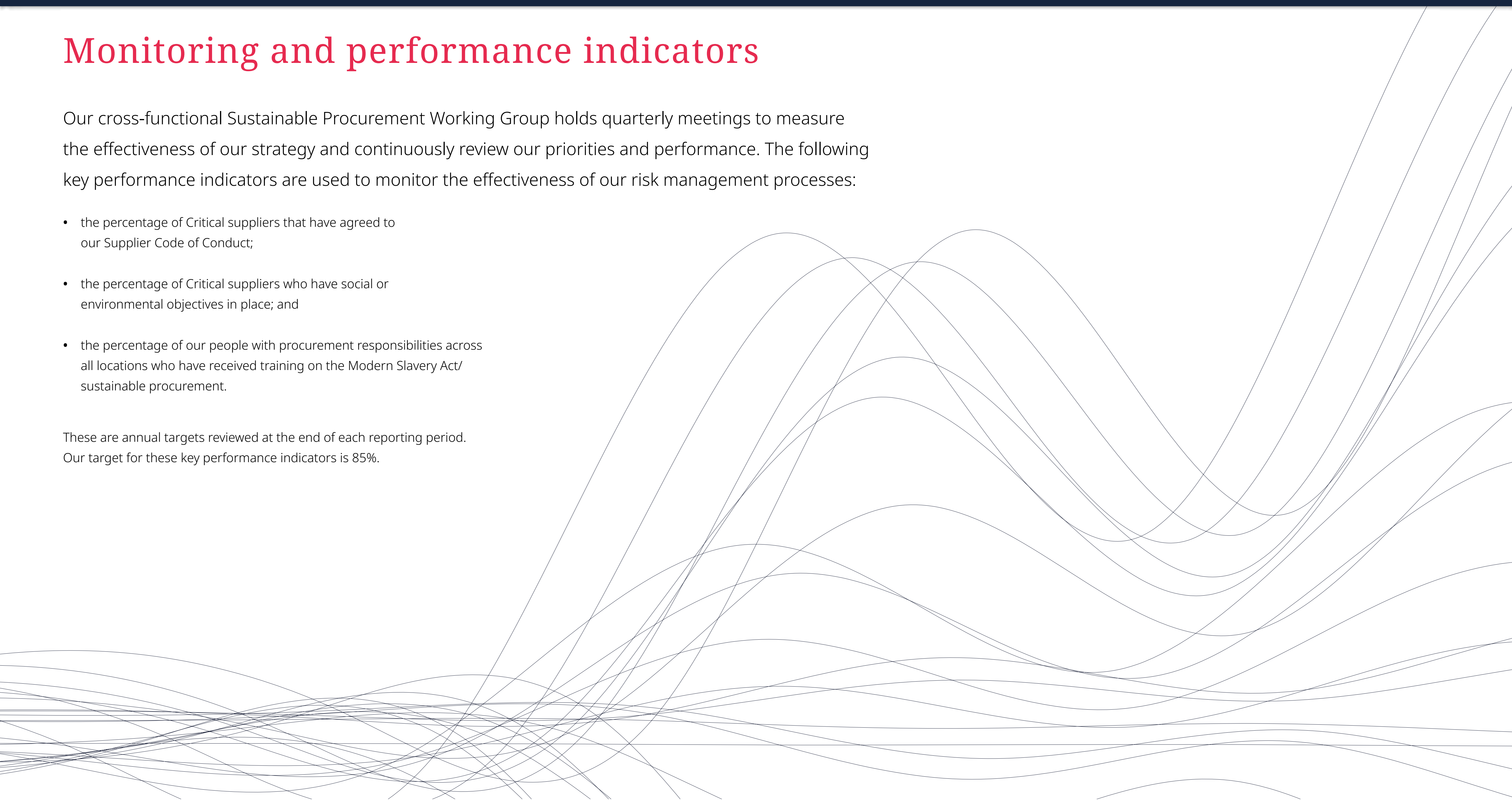
We recognise that the consequences of global warming and migration, the ongoing situation in Ukraine and the Middle East, and other geopolitical factors, have and will continue to impact the risk of modern slavery across a range of sectors, as does the economic uncertainty and instability they have created. We have undertaken and will continue to update such assessments and steps as necessary to address these and other emerging risks.

# Monitoring and performance indicators

Our cross-functional Sustainable Procurement Working Group holds quarterly meetings to measure the effectiveness of our strategy and continuously review our priorities and performance. The following key performance indicators are used to monitor the effectiveness of our risk management processes:

- the percentage of Critical suppliers that have agreed to our Supplier Code of Conduct;
- the percentage of Critical suppliers who have social or environmental objectives in place; and
- the percentage of our people with procurement responsibilities across all locations who have received training on the Modern Slavery Act/ sustainable procurement.

These are annual targets reviewed at the end of each reporting period. Our target for these key performance indicators is 85%.





# Reporting concerns

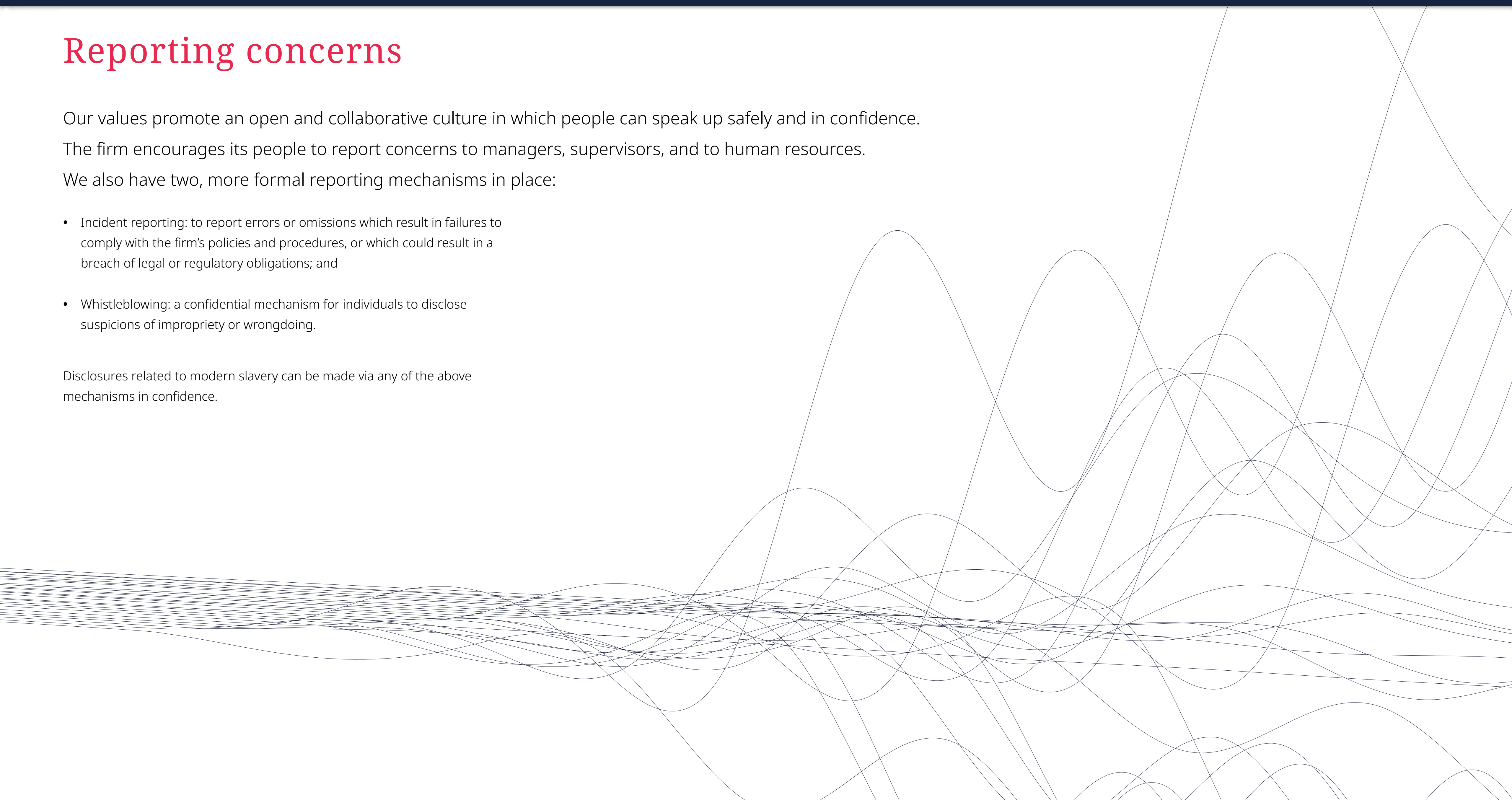
Our values promote an open and collaborative culture in which people can speak up safely and in confidence.

The firm encourages its people to report concerns to managers, supervisors, and to human resources.

We also have two, more formal reporting mechanisms in place:

- Incident reporting: to report errors or omissions which result in failures to comply with the firm's policies and procedures, or which could result in a breach of legal or regulatory obligations; and
- Whistleblowing: a confidential mechanism for individuals to disclose suspicions of impropriety or wrongdoing.

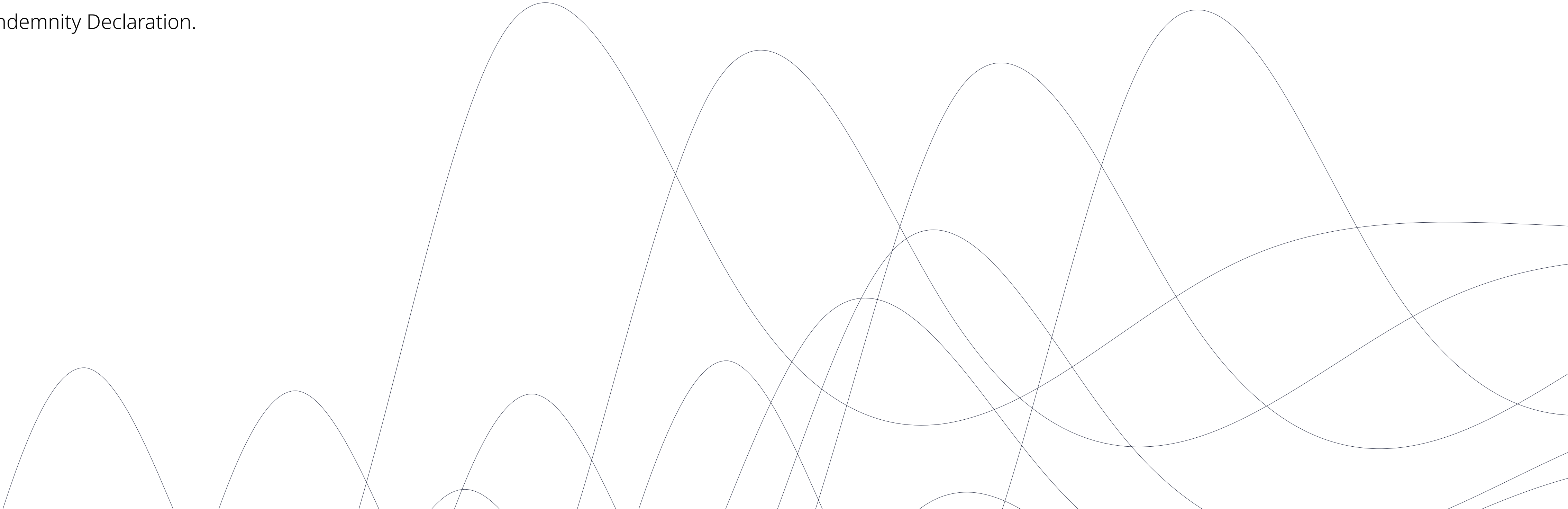
Disclosures related to modern slavery can be made via any of the above mechanisms in confidence.



# Training

Since 2020 all colleagues with procurement responsibilities or who are supplier relationship managers for key suppliers are required to periodically complete our Modern Slavery Act Practical Training. The completion rate for the most recent round of training was 59%. More recently we have developed a shorter awareness training, which we plan to roll out in 2023/24 to a wider group of colleagues in our business who work with suppliers or own supplier relationships, to further increase awareness and understanding of modern slavery within the firm.

The topic of sustainable procurement is integrated into the firm's new starter induction presentation in the UK and Ireland. All of our people are required to undertake mandatory training on policies relevant to their roles and responsibilities, and assurances on compliance is obtained via the firm's annual Compliance and Professional Indemnity Declaration.



# Responsible business

At DLA Piper, we believe great businesses can make a better world. That's why, every day, we help our clients to succeed, and be responsible, sustainable businesses. Our view is that, together, we can make business better. The firm has adopted Sustainability and ESG as a strategic priority for the firm, and [Impactvise](#) has rated us the number one law firm in the world for ESG performance out of over 1,000 law firms globally.

We have a responsible ethos and care about our people, our communities, the environment, and uphold high governance and ethical standards. As a firm, we actively engage with our people, our clients and our communities to understand evolving expectations, and ensure we meet and exceed those expectations.

Our Responsible Business strategy encompasses our approach to our people, our communities and partners, and the environment. The Responsible Business team also ensures the firm has a joined-up approach to Sustainability and ESG work with our clients, supporting our service areas and lawyers with clarity on social and environmental risks and opportunities. We have in 2023 refreshed the firm's Sustainability and ESG SteerCo by appointing regional representatives onto the Committee to ensure that our strategy better reflects local policy, market and stakeholder concerns and approaches from every geography.

DLA Piper has been a signatory to the UN Global Compact (UNGC) 10 Principles since 2013. We have aligned our strategies and operations with the universal principles on human rights, labour, anti-corruption, and the environment. We publish an annual Sustainability Report, to reaffirm our commitment to these principles and demonstrate our progress in working to achieve them. Since the Sustainable Development Goals (SDGs) were agreed in 2015, we also embraced them as a guiding framework for achieving positive impact. Our latest Sustainability Report is published on our website, [further information here](#).



# Board approval

The DLA Piper Board approved this statement on behalf of the members on 31 October 2023.



**Simon Levine**, Managing Partner.



# Thank you



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