



Slavery & Human Trafficking Statement 2019



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Slavery & Human Trafficking Statement 2019



This is our fourth statement published in accordance with Section 54 of the Modern Slavery Act 2015. It outlines the steps taken in the financial year ending 30 April 2019 and our current and future plans to ensure we continue to address this important issue.

Background

Human trafficking, forced labour and the exploitation of vulnerable workers are abuses of basic human rights and have no place in our business or supply chain. It is estimated that more than 40 million people are victims of modern slavery, including almost 25 million workers trapped in forced labour.

Our approach is to understand how and where modern slavery occurs and to continuously review and improve the policies and processes we have in place to prevent it. In practice, this means:

- Raising employee awareness of the risks of modern slavery and human trafficking
- Reviewing and strengthening our supply chain risk assessment processes
- Collaborating across sectors to gain insight and share knowledge and adopt best practice.

Governance

DWF became a signatory of the UN Global Compact in 2016, to ensure we conduct business to the highest ethical standards and we continue to align the way we do business to the UN Sustainable Development Goals.

We make a public commitment to responsible business covering human rights, employment standards, environment and anti-corruption. We report annually on progress against these principles through a publicly available "Communication on Progress" report. Principle one is "the protection of internationally proclaimed human rights" and principle four is "the elimination of all forms of forced and compulsory labour."

We also abide by the following international and national codes and standards:

- UN Universal Declaration of Human Rights
- ILO (international Labour Organisation) labour standards
- UK Living Wage

Our CSR Leadership Group, chaired by Group CEO Andrew Leatherland, reviews and monitors progress. The group is made up of representatives from across the DWF Group and embeds our responsible business strategy and best practice.

As a business providing legal and other professional services, we consider the risk of modern slavery happening within our business to be low.

Business, Organisational Structure & Supply Chains

We provide solutions for clients across a range of complex, managed and connected legal services. We have over 3200 people working in 28 locations in 14 jurisdictions across 4 continents. Key geographies for growth are UK, Europe, Australia, Canada and US.

Our primary business sectors continue to be Insurance, Real Estate and Financial Services with deep expertise extending across five other sectors:

- Energy & Industrials
- Public Sector
- Retail, Food & Hospitality
- Technology
- Transport

DWF is the collective trading name for our global legal practice and multi-disciplinary commercial business comprising DWF Group plc and its group entities, including DWF LLP, DWF Law LLP, its and their subsidiaries and subsidiary undertaking, any of its and their holding companies and parent undertakings, and any subsidiary or subsidiary undertaking of such holding companies and parent undertakings (in each case as defined by sections 1159 and/or 1162 of the Companies Act 2006, as applicable).

The way we do business is based on our values and reflects the inclusive behaviours that we want to be known for. We run our business with integrity and act responsibly to make DWF a great place to work and do business. This includes the manner in which we source goods and services from our suppliers.

We have more than 2,000 direct suppliers in our supply chain providing recruitment, goods and services to support the operational requirements of a global business. Supply categories include our premises, catering, office supplies, cleaning, IT, professional services and business travel.

Policies

Our values continue to guide our actions and behaviours with clear expectations set out in policies which are available to all employees internally.

In addition to our Anti-Slavery policy which sets out our zero tolerance approach, we have a number of policies and procedures in place that reflect the way we do business and set out expectations to all our employees. These policies visibly reflect our commitment to responsible business policies and practices that are fair, transparent and inclusive. These include:

- Human rights
- CSR
- Anti-bribery
- Whistleblowing
- Diversity & inclusion
- Dignity at work

Our Employment Policies and processes make sure that all our employees have the appropriate rights to work and are employed in accordance with local employment legislation. We believe it is important that all employees are appropriately rewarded for the work they do and are accredited by the Living Wage Foundation.

Policies make it clear that we will support and protect 'whistle blowers' and that retaliation of any kind will not be tolerated. In the last 12 months we had no reported incidents of slavery or trafficking in our operations.

Managing our Supply Chain

In 2018, we launched our Supplier Code of Conduct and in 2019, an Ethical Sourcing Questionnaire which is a self-assessment tool covering a range of topics including Modern Slavery and Forced Labour.

Expectations of suppliers are grouped into six key areas:

- Human Rights
- Health & Safety
- Responsible Supply Chain Management
- Inclusion & Diversity
- Business Integrity
- Environmental Management

All DWF suppliers are expected to implement a zero tolerance approach to slavery, forced labour and human trafficking and comply with all local and national laws and regulations. Our procedures are designed to identify and assess areas of potential risk.

CSR risk criteria, including human rights, are fully integrated into the sourcing process. Our process includes details of every new supplier's compliance assessed through DWF's Request for Proposal (RFP) document, which includes a statement of compliance with DWF's Supplier Code of Conduct, and a

mandatory Ethical Sourcing Questionnaire response. In addition, the RFP stipulates that DWF reserve a right of audit with any supplier.

Existing suppliers are required to sign a statement of compliance, undertaking that they have reviewed their business operations and their supply chains for evidence of any instances of slavery, forced labour or human trafficking.

Over the past year we have developed a structured approach for any employee involved in the purchasing of goods and services on behalf of DWF, and continued to reinforce the reality that modern slavery is a potential risk within supply chains and needs to be factored into the decision-making process.

In the last 12 months we had no reported incidents of slavery or trafficking from our suppliers.

We continue to collaborate with our peers, supply chain and external organisations to improve our approach to understanding the potential risk of modern slavery in our own supply chains and across the industry.

Training & Awareness

We have significantly enhanced our awareness training to improve understanding of modern slavery so all our employees can support in the fight against it. Our training covers:

- The different types of criminal offences under the Modern Slavery Act
- The practical checks that should be made when recruiting new employees
- How to identify victims of slavery
- What due diligence needs to take place when working with clients and suppliers

All new joiners are made aware of our Modern Slavery Statement, Anti-Slavery Policy and on line Training via our Induction & On-boarding Portal.

Focus areas for 2019/20

- Further development of mandatory awareness training and materials
- 1059 employees have already completed our new Modern Slavery Training launched on 20th September 2019
- Continuing engagement with our suppliers and clients
- Participation in the Home Office Transparency in Supply Chains Consultation through membership of the Greater Manchester Modern Slavery Business Network
- Attend external conferences to keep informed of best practice and take up relevant speaking opportunities to share what we do
- Promotion of a "speak up" culture within our business to promote openness and transparency and encourage all of our

employees or those working on our behalf to raise any concerns. Activity includes:

- A Global Pulse Survey launch on 6 November 2019
- A Whistleblowing Policy review by 31 January 2020
- A DWF Code of Conduct and "Speak Up" Helpline by 31 January 2020

There is no place for modern slavery in our business or our supply chain and we will continue to evolve the way we identify and mitigate modern slavery and human trafficking risks in our business and supply chain.



A. R. Leatherland

This Statement was approved by the Board of Directors of DWF Group plc on 19 November 2019 and is signed on behalf of the Board by Group CEO Andrew Leatherland.



Beyond borders, sectors and expectations

DWF is a global legal business, connecting expert services with innovative thinkers across diverse sectors. Like us, our clients recognise that the world is changing fast and the old rules no longer apply.

That's why we're always finding agile ways to tackle new challenges together. But we don't simply claim to be different. We prove it through every detail of our work, across every level. We go beyond conventions and expectations.

Join us on the journey.