

UN Global Compact 2019



Communicating on progress

Contents



Introduction	3
Responsible Business	5
About DWF	6
Human Rights	8
Modern Slavery	9
Labour	11
UK Gender Pay Gap 2019	12
Engaging our people	14
Environment	15
Anti-Corruption	16



Find out more about DWF

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Introduction

Statement from our Group CEO

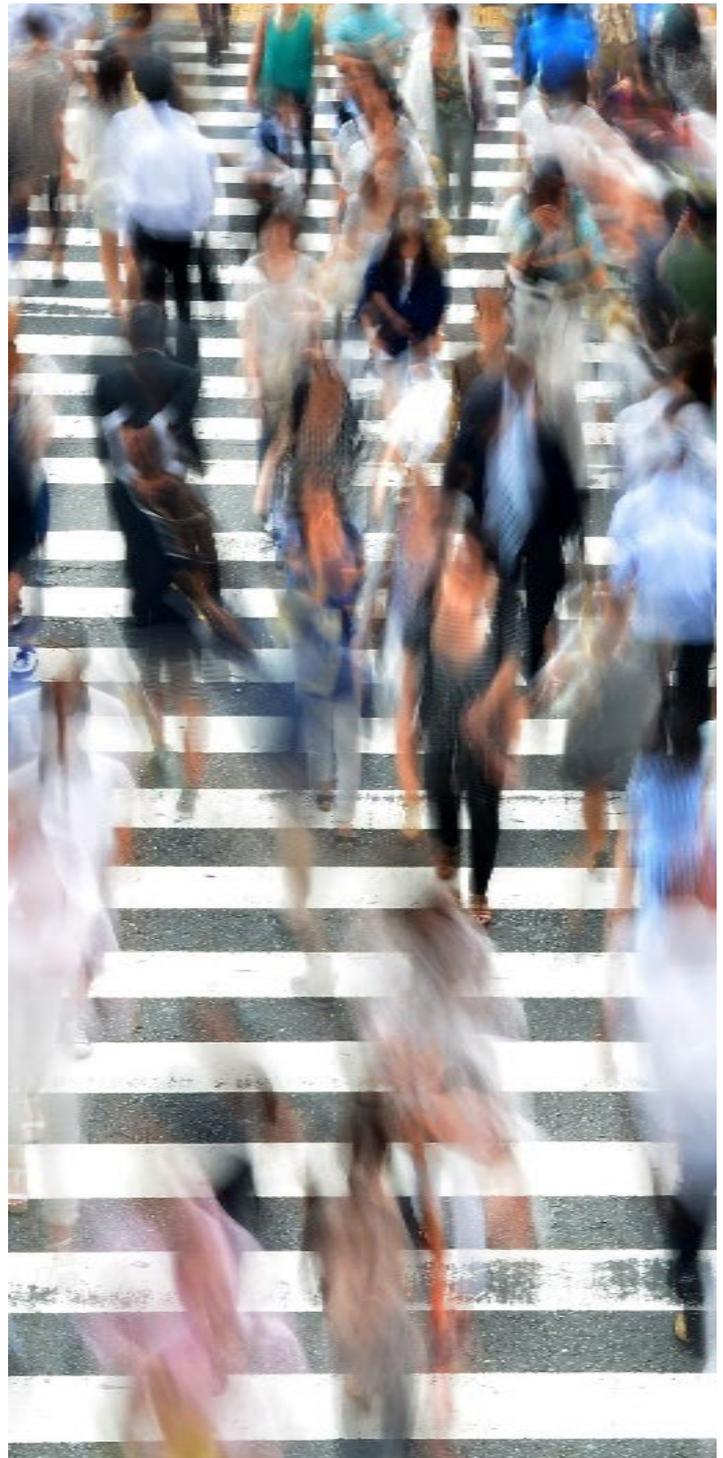
“As a global business, we continue to be guided by our values to inform what we do and remain focused on operating sustainably. Through our activities, we strive to conduct our business in a manner that supports universal human rights and is environmentally and socially responsible.

In this annual Communication on Progress, we describe our actions to support and improve the integration of the Global Compact and its ten business principles into how we do business and I am delighted to reaffirm that support.

Ultimately, we continue to take a sustainable view of our business performance, the "how we do things at DWF", to integrate environmental, social and ethical principles to maintain and enhance our long-term value. In doing so, we not only maintain a focus in the areas of Human Rights, Labour, Environment and Anti-Corruption but also directly and indirectly, contribute to the UN Sustainable Development Goals."



Andrew Leitherland
Group CEO



Our Guiding Principles

- We conduct business with integrity, complying with all applicable laws, rules and regulations of the countries in which we operate
- We believe in being good corporate citizens and recognise that without thriving communities and talented people our business won't be sustainable, so we have a responsibility to contribute to community prosperity by innovating, learning and sustaining our performance
- We engage with key stakeholders to build understanding and maintain trust
- We promote a diverse and inclusive workplace and will not tolerate discrimination, harassment or victimisation in our workplace or in connection with any service provision
- We adopt a zero tolerance to slavery, forced labour and human trafficking
- We believe in developing mutually beneficial relationships with our suppliers, founded on trust and respect
- We work hard to minimise our environmental footprint resulting from our business operations and promote greater environmental responsibility
- We report publicly on our sustainability performance through our UN Communicating on Progress Report and our Annual Review.

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery



Responsible Business



Our ambition

Our ambition is to make DWF a world leader at responsible business, mobilising our collective strength as a force for good in society to:

- Create a skilled & inclusive workforce today and for the future
- Help build and sustain thriving communities in which we live and work
- Play our part to repair and sustain our planet.

Our 5 year responsible business strategy aligns with the UN Global Compact's universally accepted business principles and our actions are prioritised to contribute to the UN Sustainable Development Goals and the UN Women's Empowerment Principles.

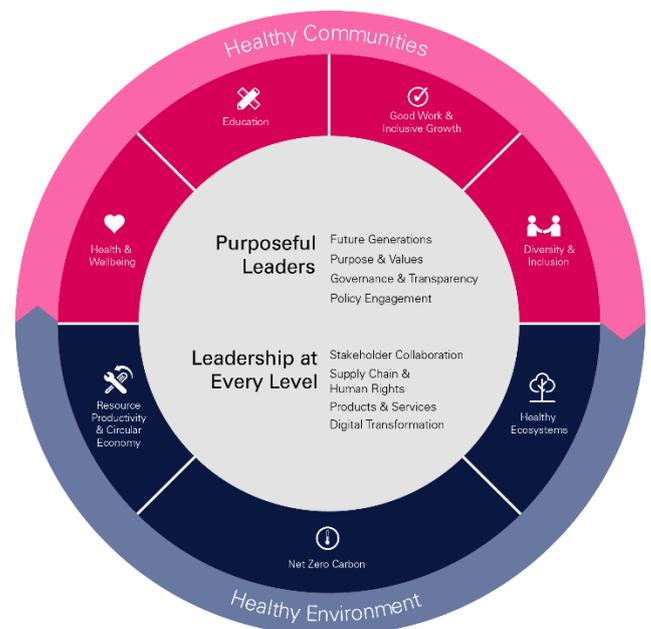
How we make a meaningful difference

- Operating responsibly in line with our purpose and values
- Creating and sustaining a business that is diverse and inclusive for all employees
- Empowering young people in areas with low social mobility to enter the world of work
- Raising funds to enable the DWF Foundation to provide grants to charities whose work impacts people in locations where we have a presence
- Donating our time and skills to tackle local social issues
- Minimising our impact as a low carbon and more circular business
- Ensuring a zero tolerance approach to modern slavery and human trafficking in our supply chain.

How we measure progress

As a signatory to the UN Global Compact and its business principles covering human rights, employment standards, environment and anti-corruption, we report on our progress against measurable outcomes annually.

We remain an active member of Business in the Community (BITC), the largest business-led membership organisation in the UK dedicated to responsible business. We use their Responsible Business Tracker to measure and evaluate our performance. In addition, BITC's Responsible Business Map guides our actions globally to address those issues most pressing in society and where we can make the most meaningful impact.



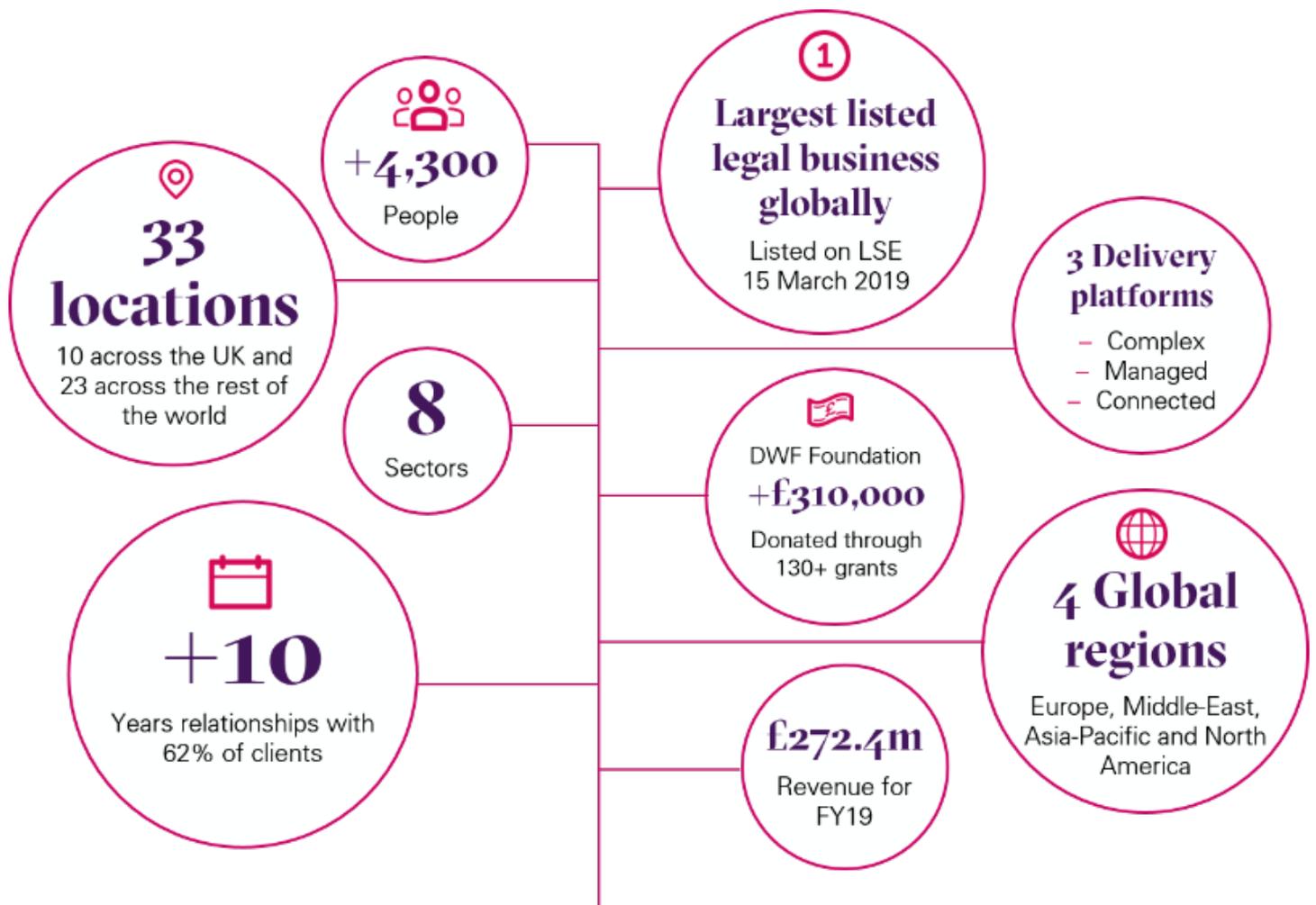
"Our success would not be possible without the efforts of our people who are inspired by our purpose and values to behave responsibly and with integrity, shaping the way we do business."

Ty Jones
Director CSR & Engagement

About DWF



Transforming legal services through our people for our clients.



We are a global legal business, transforming legal services through our people for our clients.

By questioning traditions and thinking beyond conventions, we achieve outstanding levels of innovation. We have received recognition for our work by The Financial Times who named us as one of Europe's most innovative legal advisers, and we have a range of stand-alone consultative services, technology and products in addition to the traditional legal offering.

We connect on a global scale, sharing our knowledge and technical expertise to identify and anticipate challenges. We are finding new solutions for clients within eight core sectors including Energy and Industrials, Financial Services, Insurance, Public Sector, Real Estate, Retail, Food & Hospitality, Technology and Transport.

Building business relationships that inspire trust and confidence across all levels of our business; means we deliver an exceptional client experience. We work with a range of FTSE 100 multinational household names to private individuals, from both the public and private sector.

Living our Values

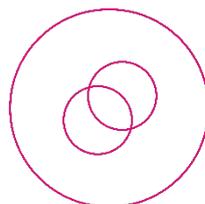
Our culture depends on all of us living our shared values each and every day, so our clients, colleagues, shareholders and other stakeholders can remain confident that their trust in us is not misplaced.

Our values define who we are and what we stand for. They are what we believe and influence the behaviours people see and experience. That is why it is so important that we apply these values to everything that we do.



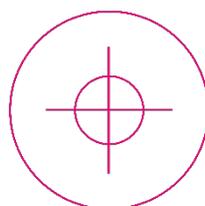
Our Values

Created, shared and upheld by our people, our values help us to define and reinforce our culture.



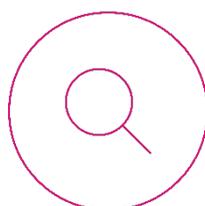
Be better together

By supporting each other and working as a team, we can achieve more for our clients and ourselves.



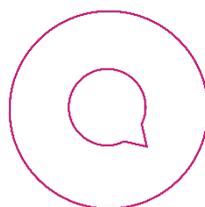
Always aim higher

By refusing to do only the minimum, and reaching further every time, we expand the realm of what's possible.



Attend to details

Paying attention to every last detail is the right way to ensure that clients experience the very best of DWF.



Keep all promises

A promise is a promise, no matter how large or small. By keeping promises, we build trust, loyalty and commitment.



Disrupt to progress

Just because there's an established way of doing things, it doesn't mean things always have to be that way!

Human Rights

Our responsibility is to respect all human rights.

Global Human Rights Policy

DWF supports the principles of Human Rights set out in the Universal Declaration of Human Rights, the International Labour Organisation (ILO) core labour standards and is a signatory of the United Nations Global Compact. In addition, we support the UN's wider development agenda including the UN Sustainable Development Goals.

A responsible and sustainable approach to doing business is central to our purpose and in conducting our business activities, DWF respects these rights and seeks to uphold and promote them as part of the way we do business, working and collaborating with our people, communities, suppliers, charities and other appropriate stakeholders.

The way we do business is based on our values and reflects the behaviours that we want to be known for internally and externally. We run our business with integrity and want our culture and values to be at the heart of everything we do, recognising that our people not only want a great place to work, but take pride in being part of a principled business.

In 2017, we published our first Modern Slavery and Human Trafficking Statement. This demonstrates our commitment to doing business responsibly and to explaining the meaningful steps being taken.



Statement of principles

DWF respects and values the dignity, wellbeing and rights of our people and the wider community, taking action to:

- Support and promote the protection of internationally proclaimed Human Rights;
- Ensure we are not complicit in Human Rights abuses through our business relationships and supply chain management;
- Eliminate all forms of discrimination, and promote a diverse and inclusive workplace;
- Recognise the freedom of association and right to collective bargaining;
- Provide a safe and healthy workplace;
- Adopt a zero tolerance to slavery, forced labour and human trafficking;
- Minimise our environmental footprint resulting from our business operations, and promote greater environmental responsibility;
- Help protect human rights and improve opportunities for people living in the communities where we operate
- Maintain our position as a Living Wage employer;
- Embed anti-corruption and ethical standards in our business practices.

As a global legal business, we have a responsibility to go beyond stating our commitment to respect Human Rights. We must demonstrate what we do to implement them in practice across our day to day business operations, simply because it is the right thing to do. This includes ensuring that if any human rights violations are identified, we endeavour to take appropriate action swiftly.

As a responsible business, we will build on work done so far, and continue to affirm our values, raise awareness among our people, clients, communities and suppliers, and take action where necessary.



Andrew Leatherland,
Group CEO

Modern Slavery

There is no place for modern slavery in our business or our supply chain.

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:

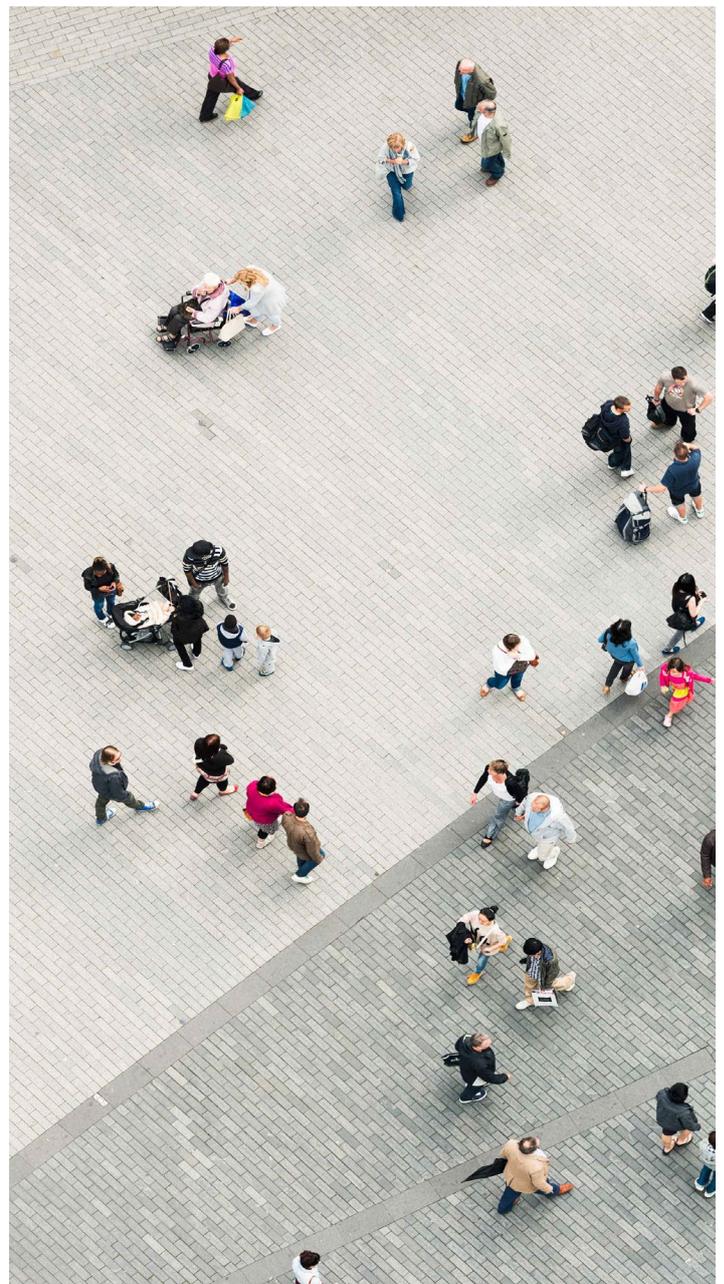
- Raising employee awareness of the risks of modern slavery and human trafficking
- Reviewing and strengthening our supply chain risk assessment processes
- Collaborating across sectors to gain insight and share knowledge and adopt best practice.

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
- Sustainability
- Anti-bribery
- Whistleblowing
- Diversity & inclusion
- Dignity at work.

We make sure that all our employees have the appropriate rights to work and are employed in accordance with local legislation. Policies make it clear that we will support and protect ‘whistleblowers’ 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.

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



Managing our Supply Chain

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.

In addition to our Supplier Code of Conduct, we developed our Ethical Sourcing Questionnaire in 2019, as a self-assessment tool covering a range of topics including modern slavery and forced labour.

Expectations of our suppliers are grouped into six key areas:

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

Our procedures are designed to identify and assess areas of potential risk and 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 to reinforce the reality that modern slavery is a potential risk within supply chains and must be factored into the decision-making process.

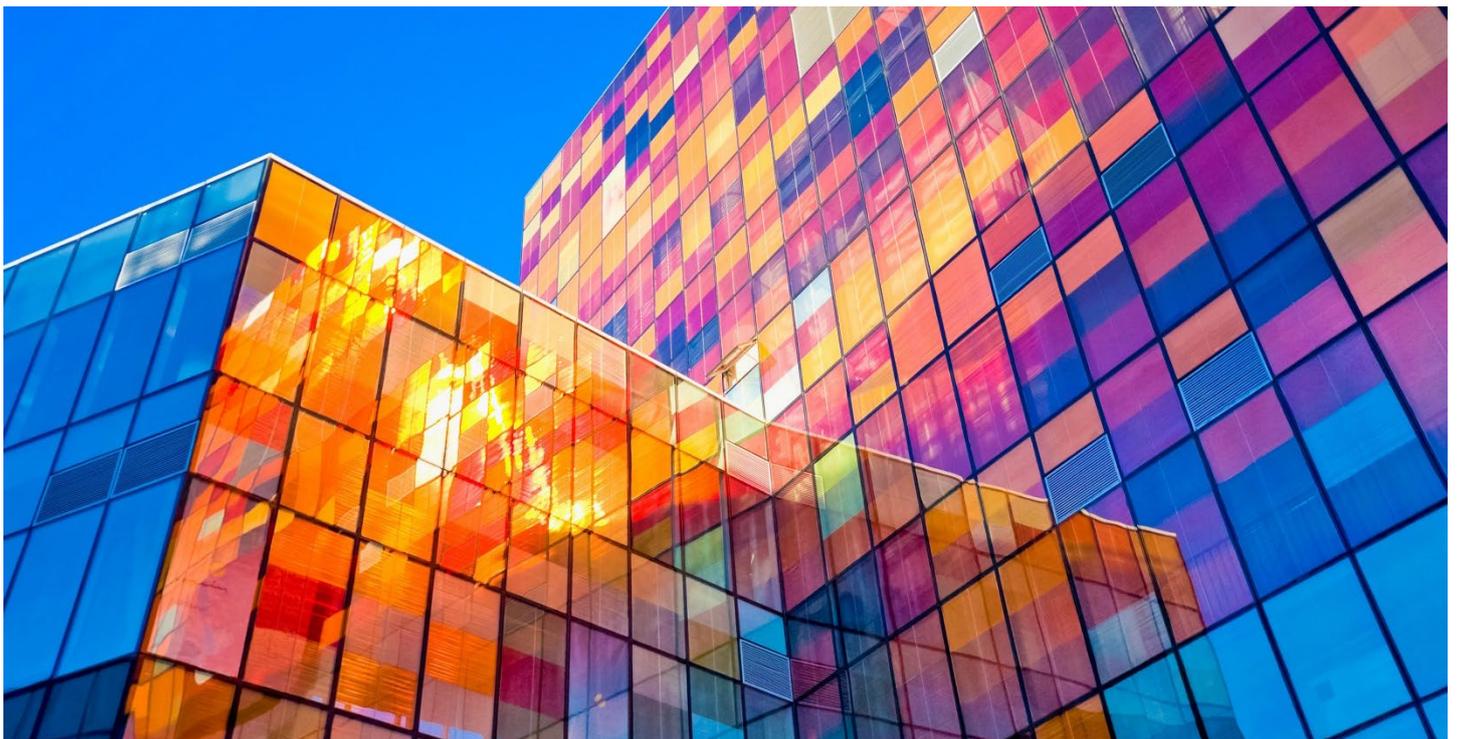
In the last 12 months we had no reported incidents of slavery or trafficking from our suppliers.

Areas of focus in 2019/20

- We have further developed our awareness training and materials to engage our people
- 1749 employees (54%) have already completed our new Modern Slavery Training
- We have continued to engage with our suppliers and clients
- We participated in the UK Home Office Transparency in Supply Chains Consultation through membership of the Greater Manchester Modern Slavery Business Network
- We have attended external conferences to keep informed of best practice and take up relevant speaking opportunities to share what we do
- We continue to promote 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.

LGBT UN Global Standards

We strive for all our colleagues to have access to equal opportunity and respect wherever they are located. Alongside some of the world's largest businesses, DWF has made a global commitment in support of the UN Standards which aim to tackle discriminatory practices in the workplace, the marketplace and in the community.



Labour

We recognise that our people not only want a great place to work, but take pride in creating it.

Fair working practices

Our purpose is to transform legal services through our people for our clients.

As a global company, this means:

- Sustaining a workplace where everyone is included, valued and equipped with skills for today and the future
- Nurturing a collaborative culture to maximize the expertise and abilities of all our employees
- Maintaining workplaces that live our values and the importance of employee wellbeing
- Ensuring all our employees are treated fairly and with respect and dignity, in a safe and comfortable environment that values and promotes diversity
- Providing opportunities for dialogue, feedback as well as personal and professional growth.

Inclusive culture

We have a collaborative and inclusive culture that drives our decisions. Our Diversity & Inclusion Policy and Dignity at Work policies make it clear that the business takes a zero tolerance approach to discrimination, bullying and harassment.

Our Diversity & Inclusion Leadership Group defines and executes our global inclusion strategy. Executive Sponsors and more than 40 senior leaders, supported by our Affinity Networks and network of passionate Diversity Champions, deliver action plans supporting gender, race, LGBT+, age, disability, agile and flexible working and mental health.

We are building inclusivity by:

- Being a force for good in society, acting globally and engaging locally
- Demonstrating visible commitment at the highest level
- Embedding sustainable and socially responsible business principles
- Making DWF a great place to work and do business.



Health & Wellbeing

We want to continually improve the health of our business through a combination of preventative, protective and proactive interventions that address the cause as well as the effect of any health and wellbeing issues.

In 2019, we became an early adopter of the Mindful Business Charter, a collaboration initially between the financial services and legal sector to change the way we work by removing avoidable stress. As a signatory, we pledge to promote a culture of openness about mental wellbeing, ensure responsible business is included as an area of assessment during significant procurement processes and drive forward the actions necessary to change working practices in support of the principles of the Charter.

Our Employee Assistance Programme is a completely confidential helpline and is there to support our people through difficult times. Its available 24 hours a day, seven days a week in all of our locations

The DWF Academy

Our Learning & Development Academy was introduced in 2014 and is continually evolving to remain a leading edge learning management system which facilitates a flexible learning environment for all our people.

Our approach continues to follow the 70:20:10 principle, whereby 70% of learning is achieved in role, 20% is achieved through informal learning and 10% is achieved through formal learning and development.



UK Gender Pay Gap 2019



Employees Hourly Pay Gap	2017	2018	2019
Mean hourly pay gap	24%	23%	22%
Median hourly pay gap	27%	24%	23%
Self-Employed Hourly Pay Gap	2017*	2018	2019
Mean hourly pay gap	13%	16%	15%
Median hourly pay gap	5%	16%	15%
Combined Hourly Pay Gap	2017*	2018	2019
Mean hourly pay gap	50%	48%	39%
Median hourly pay gap	36%	32%	33%

*Not Published in April 2017

A reduction in our combined mean gender pay gap for a second consecutive year, an improvement in female representation and the fact that the proportion of women in our upper pay quartile has increased, are positive indicators that our actions are having an impact.

However, the slight increase in our median pay gap is a powerful reminder that the pay gap is largely the result of having more men at senior levels in higher-paid roles and a higher proportion of women relative to men in roles, which fall within our lower pay quartiles.

We recognise that reducing our gender pay gap is an action that requires a sustained effort at every level of our business and at every point in the employee life cycle, from attraction & recruitment through to development, succession planning & promotion.

Our sustained focus on meaningful actions will result in a more diverse workforce supported and empowered through our inclusive culture and values.



Targeted Action

In 2019, we introduced Diversity & Inclusion targets.

Whilst we are already meeting the voluntary UK target of having at least 33% of women on our plc Board, our continuing focus is on increasing female representation on our Executive Board to at least 33% by 2022, an increase from 27% and for women to hold at least 30% of other senior leadership positions, an increase from 27%.

- The Board to maintain its current gender diversity (33%) with no less than three women on the board**
- Female representation on the Executive Board to be raised to at least 33% by 2022**
- Women to hold at least 30% of senior leadership positions by 2022**
- Target to achieve at least 10% BAME representation across senior leadership positions by 2022**
- The Board to initiate BAME pay gap reporting by the end of 2020**



We support the Women's Empowerment Principles

- ✓ Establish high-level corporate leadership for gender equality
- ✓ Treat all women and men fairly at work - respect and support human rights and non-discrimination
- ✓ Ensure the health, safety and well-being of all women and men workers
- ✓ Promote education, training and professional development for women
- ✓ Implement enterprise development, supply chain and marketing practices that empower women
- ✓ Promote equality through community initiatives and advocacy
- ✓ Measure and publicly report on progress to achieve gender equality.

In support of

WOMEN'S EMPOWERMENT PRINCIPLES

Established by UN Women and the UN Global Compact Office

In 2019 we used International Women's Day (a week long campaign at DWF), National Apprenticeship Week, Responsible Business Week, monthly wellbeing themes, our own annual Diversity Week & International Men's Day activity as key inclusion campaigns.



In the UK we are proud to be:

- A Stonewall Top 100 Employer for LGBT+ employees and Bi-Inclusive Employer of the Year
- A UK Top 10 Employer for Working Families
- Ranked 16th in the 2019 Social Mobility Index
- Disability Confident and maintain our Leadership status
- One of only 9 businesses in the UK to achieve a Gold Standard performance in the Employer Network for Equality & Inclusion's TIDE benchmark (Talent Inclusion & Diversity Evaluation)
- A UK Living Wage Employer

Target Gender Equality

We are taking part in Target Gender Equality, a new programme that will help implement the Women's Empowerment Principles and strengthen our contribution to Sustainable Development Goal 5 which aims to achieve gender equality in terms of representation, participation and leadership in business globally



The Prince's Responsible Business Network

Participant in the Responsible Business Tracker*



Engaging our people

Our Engaging People Executive (EPE) is responsible for driving our ambition to be a great place to work.

The EPE has a focus on values and culture, high performance and effective communication. It is supported by our Employee Forum to ensure that the input of employees at all levels within the business is taken into consideration.

Taking our Pulse

Our global employee engagement index is currently 75%. In 2019, we moved away from traditional annual surveys to a more frequent digital platform that helps leaders and line managers to build action plans, focusing on the improvements that matters the most for our people.



DWF Achievers

Alongside this, we launched our digital recognition platform, 'DWF Achievers' which is designed to recognise and celebrate people who live our values and help shape our culture through their performance and the contributions they make to DWF.

The Rubie Awards

2019 also saw the launch of our annual Rubies Awards. It was the first time we have celebrated together as a business to reward the hard work and dedication of our people. As DWF grows across the globe it's more important than ever that we pause and take a moment to recognise the individuals who are living the values and are being true exemplars in their roles.



Climate change is our most pressing shared challenge and opportunity.

In supporting the principles of sustainable development, we have in place an environmental management system to identify and control the impacts of our business and enhance current working practices.

As a global company, this means:

- We actively manage our carbon emissions
- We take action to ensure efficient use of resources, following the Follow the 'Reduce, Reuse, Recycle' waste hierarchy
- We invest in technology to help drive our sustainability agenda
- In the UK, we maintain ISO14001 certification
- We collaborate to develop, apply and promote environmental best practice to enhance our resilience to climate change.

Carbon emissions generated by the energy we use and the travel we undertake, impacts our contribution to climate change. Our ambition remains to minimize our impact as a low carbon and more circular business.

Reducing carbon emissions:

Year	Tonnes per person per year
2015	2.6
2016	2.3
2017	2.25
2018	1.3
2019	1.5*

*A slight increase in 2019 to 1.5 – due to international growth and the resultant business travel.

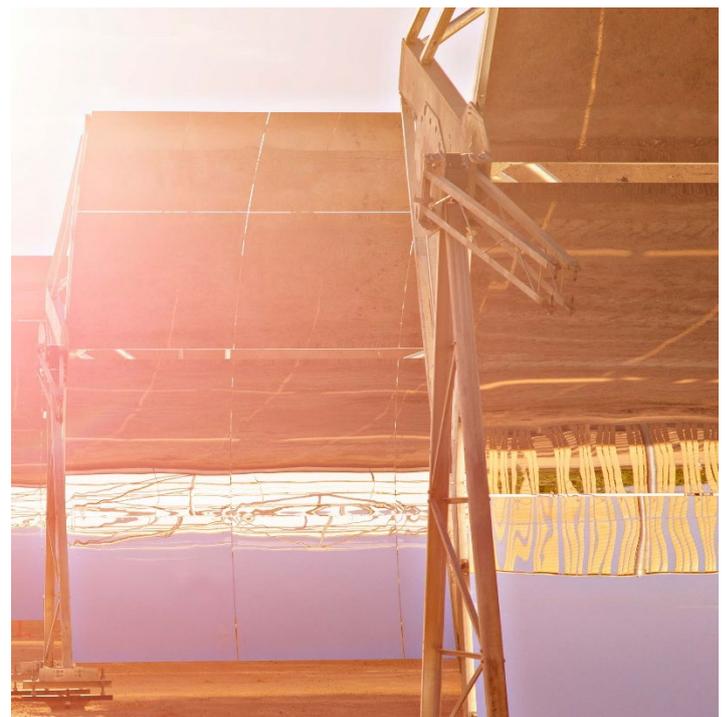


As a minimum:

- We maintain a target of recycling at 85% per site
- Recycle all suitable office furniture and equipment (i.e. chairs, desks, photocopiers)
- Re-used furniture across DWF's offices and some given to charity
- Continually seeking to reduce energy use through proactive estate management, space neutral expansion and agile working
- Encouraging the reduction of plastic bottles/single use plastics - we have sourced DWF re-usable cups and bottles which are sold and monies raised support our Charitable Foundation.

In the UK, DWF falls under the Energy Savings Opportunity Scheme ("ESOS") and completed both Stage 1 and Stage 2 well within the deadlines set.

In addition, we understand our responsibility under the Streamlined Energy & Carbon Reporting ("SECR") which is a UK Government reporting programme that came into force on 1 April 2019. Companies within scope must collect and measure their energy and carbon information – and submit this as part of their annual accounts filed with Companies House.



Anti-Corruption

We take a zero tolerance approach to bribery and corruption.

Having policies in place that encourage individuals to raise concerns is a core part of an ethical and supportive business culture. We are committed to maintaining an open culture with the highest standards of honesty and accountability, a culture where colleagues can report any legitimate concerns in confidence.

Our policy development in this area reflects the key outcomes of risk assessments conducted into our business practices as a global business. Whistleblowing and anti-bribery and corruption are essential components of this.

In 2020, we will launch our Code of Conduct which describes how we put our values into practice. Its purpose is to help us to do the right thing, to ask the right questions and make the right decisions every day.

The Code covers areas such as respect for human rights, discrimination, conflicts of interest, information security, bribery & corruption and whistleblowing.

Zero Tolerance

While this Code provides guidance for certain situations there are specific areas where we have a zero tolerance approach:

- Unsafe, illegal or unethical working practices
- Discrimination, bullying and harassment
- Bribery and corruption
- Retaliation against anyone who speaks up and does the right thing

We are committed to maintaining an open culture with the highest standards of honesty and accountability, a culture where colleagues can report any legitimate concerns in confidence, without detriment to the person raising the concern. The promotion of our global whistleblowing and anti-bribery & corruption policies will form part of our new Speak Up campaign in 2020, which will also include the launch of a Speak Up helpline.



DWF business conduct and ethics

Our ambition is to be a world leader in responsible business

We continue to align our operations to support the UN Global Compact and its business principles covering, human rights, employment standards, environment and anti-corruption.

We are also committed to playing our part in delivering on the UN Sustainable Development Goals – 17 global goals designed to end poverty and protect our planet.

Together, we are responsible for a working environment where our values, policies and Code of Conduct are actively supported and together we must make sure everyone who works for us or with us understands the way we do business.

Together we will:

- Sustain a safe, healthy and productive place to work and do business
- build an agile, inclusive and sustainable workforce
- compete for business legally, fairly and ethically
- mobilise our collective strength as a force for good in society
- avoid situations that create real or potential conflicts of interest
- maintain our zero tolerance approach to bribery or any form of unethical inducement or payment to gain any advantage for DWF
- support the principles of Human Rights set out in the Universal Declaration of Human Rights across our global operations
- not engage in any form of human trafficking or use forced, compulsory, illegal or child labour, or knowingly work with anyone who does
- work with suppliers who share our ethical standards
- contribute to the global effort to reduce, reuse and recycle wherever possible
- encourage everyone to Speak Up if they are unsure about what to do, or concerned that our values, policies or Code are being compromised
- continue to review our operating procedures and processes to ensure we do business in an ethical, sustainable and responsible way.



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.