



# Human Rights Policy Statement

*February 2024*



Respecting and advancing human rights is central to our purpose in delivering positive outcomes with our colleagues, clients and communities. We recognise that we have a responsibility to both respect human rights and opportunities to positively impact human rights across our value chain.

We are committed to working collaboratively with our stakeholders and other businesses on human rights to inform our approach and this statement aims to help our stakeholders to understand how we put our principles into action and how we are continuing to embed respect for human rights into our business operations.

Where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights relevant to our operations.

## Statement of Principles

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.

DWF respects and values the dignity, wellbeing and rights of our colleagues, clients and communities taking action to:

- Support and promote the protection of internationally proclaimed Human Rights
- Assess our human rights impacts and integrate human rights considerations into our business
- 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 agile workplace
- Maintain a zero tolerance to slavery, forced labour and human trafficking
- Evolve our position globally as a Living Wage employer
- Embed anti-corruption and ethical standards in our business practices
- Accelerate our contribution to the delivery of the Sustainable Development Goals
- Promote a culture where colleagues feel comfortable to raise a concern and speak up
- Be transparent and provide accurate and timely disclosure

## Embedding respect for human rights

How we operationalise our respect for human rights aligned with our purpose and values

### As an employer we:

- Promote and embed equality, inclusion, diversity and measure our progress against published targets
- Recruit, recognise and reward colleagues on merit
- Implement and communicate policies and procedures, including our Business Code of Conduct
- Empower colleagues to take action to make others feel included and challenge if behaviour fails to live up to our shared values
- Make opportunities for professional development widely available
- Encourage colleagues to raise any concerns they may have regarding human rights, without fear of retaliation, through their line manager, HR or our Speak Up confidential helpline
- Promote positive mental health and wellbeing
- Provide a safe, secure, supportive and agile working environment
- Engage colleagues through Pulse surveys and our Employee led networks
- Support our communities primarily through skills based volunteering, fundraising and leadership insights.

### As a service provider we:

- Follow our Code of Business Conduct to put our values into practice. It helps us to do the right thing, to ask the right questions and make the right decisions for our clients
- Continue to integrate human rights risks along with other environmental, social and governance (ESG) risks to include deeper consideration of country and sector risks and escalation,(if required) before bringing new clients into our business
- Assess risks concerning existing clients to anticipate emerging concerns or as part of the client annual review process

- Recognise the link between climate change and human rights
- Apply policies & procedures to help protect our clients, including Anti-Money Laundering, Data Privacy and Information Security
- Support those who are vulnerable, seek to minimise the risk of harm to the welfare of those we engage with
- Investigate any complaints thoroughly and fairly

### As a purchaser of goods & services we:

- Evaluate suppliers as part of our due diligence process against key criteria, including their human rights provisions
- Require suppliers to sign up to our Supplier Code of Conduct, which defines our expectations and highlights the importance we place on respect for human rights in all our business relationships. We expect suppliers doing business with us to:
  - Respect the human rights of their employees and comply with all relevant legislation, regulations and directives in the countries and communities in which they operate
  - Ensure that all employees can make a free choice about their employment: there should be no illegal, forced, bonded, involuntary or exploited labour
  - Ensure there is no involvement in incidences of human trafficking, child labour or involuntary movement of people for exploitation
  - Pay wages which at least meet minimum national standards, overtime is voluntary, used reasonably and compensated fairly
  - Respect the rights of employees to associate freely, join or not join labour unions, seek representation and join workers' councils
  - Provide a workplace free of harsh and inhumane treatment, mental or physical coercion or verbal abuse
  - We commit to help suppliers address any human rights issues that may arise
  - We publish the steps we have taken to combat the risk of modern slavery and human trafficking taking place in either our business or our supply chains.

### As a supporter of communities we:

- Work with community partners who support some of the most socially and financially disadvantaged members of our communities
- Enable and empower young people to develop skills and confidence for the benefit of themselves and their communities
- Help tackle specific community issues such as food poverty and youth unemployment
- Encourage colleague involvement, primarily through volunteering in support of those too often excluded in society
- Collaborate and shape the agenda for action, working with other leaders to identify the ways in which business can help innovate and create more sustainable livelihoods and prosperous communities

### Governance

The Executive Board has oversight of our approach to human rights as part of our ESG and sustainability agenda.

Our ESG Leadership Group has responsibility for the overall ESG and Sustainability agenda. This Group identifies and reports to the Executive Board on ESG & Sustainability risks and opportunities and actions needed to improve in line with the ESG Strategy and evolving internal and external stakeholder expectations. It meets at least quarterly.

Actions taken in the last 12 months include:

- Enhanced content on human rights is included within our mandatory Conduct & Ethics module. Applicable to all colleagues and new starters and revisited annually
- A revised Code of Business Conduct
- A revised Supplier Code of Conduct

- Improvements to our supplier assurance and due diligence processes
- Improved performance against recognised benchmarks
- A new Sustainable Business & ESG advisory practice to support our clients on these topics

### Remedy

DWF is committed to promoting effective mechanisms for all stakeholders to report any suspected violations of our policies, including this Statement. Our Speak Up Policy outlines the process for our colleagues to report any legitimate concern in confidence. There may be occasions where clients and other third parties may wish to raise a concern. For the most part, such concerns can be raised in other ways, e.g. through a complaint. Any concern about wrongdoing will be investigated fully and effectively.

### Next steps

Responsible sourcing is integral to the way we do business. We are making changes to improve the quality and consistency of our supplier risk assessment and acceptance by introducing a similar approach to our ESG Client Policy, to categorise any risks identified and escalate concerns by the associated level of risk. Additionally, strengthening our supplier assurance framework will further help determine and assess any potential impacts of human rights, human trafficking, child and/or forced labour in our supply chain.

Internal reviews of existing suppliers will be conducted at least quarterly depending on the associated level of risk. New suppliers will follow the ESG Client Policy prior to any agreement to work with the supplier and will follow our escalation process if necessary, to determine whether the supplier is right for our business.

We remain committed to evolve and evaluate the impact of our human rights approach and to engage with our suppliers and other key stakeholder to deepen our understanding to deliver positive outcomes with our colleagues, clients and communities.



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