



2nd Slavery & Human Trafficking Statement

Slavery, forced labour and human trafficking have no place in a modern society. Being alert to the risks is a responsibility that DWF takes seriously and this statement constitutes DWF's compliance pursuant to section 54(1) of the Modern Slavery Act 2015.

This is our 2017 statement outlining the steps that DWF has taken to ensure that slavery and human trafficking are not taking place in our business or in our supply chains, in accordance with section 54 of the Modern Slavery Act 2015.

Background

As a global legal business, transforming legal services through our people for our clients, we have over 2,700 people in 26 locations across four continents. The DWF Group comprises DWF LLP, its subsidiaries and associated entities through which the Group provides legal and other services in a number of jurisdictions.

The way we do business is based on our values and reflects the behaviours that we want to be known for. 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.

As we build our international presence, our values and culture are being influenced by a much broader range of factors than ever before, including modern slavery and human rights. DWF is proud to be a signatory to the UN Global Compact and its business principles covering human rights, employment standards, environment and anti-corruption.

We report annually on progress 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". It is also our ambition to better use our expertise and motivation to align the way we do business to the UN Sustainable Development Goals.

Assessing Our Risks

As an international legal business, we consider the risk of modern slavery existing within our business to be low. However, we continue to take steps, through our policies and governance, to ensure we remain alert to any potential risks of modern slavery within our business operations and our supply chain. Since the publication of our first Modern Slavery Statement, we have not identified any examples of modern slavery within our business or our supply chain.

Supportive Policies

In addition to our Anti-slavery policy, we have a number of policies which state how we do business and the steps taken to ensure we are responsible, fair, transparent and inclusive.

These include:

- Human rights
- CSR
- Anti-bribery
- Whistleblowing



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- Diversity & inclusion
- Dignity at work

We are a Living Wage Employer and comply with all applicable employment legislation relating to employee terms and conditions, including pay, and invest heavily in supporting the development, health and wellbeing of our people. Mindful of our growing international presence, we are now reviewing our recruitment procedures to ensure we are not complicit in behaviour that contravenes our approach of fairness and transparency. Issues we will be looking for include excessive fees and passport holding.

Supply Chain Management

We have strengthened our due diligence of suppliers devising a new Procurement strategy and policy, as well as a supplier self-assessment questionnaire to determine the risk profile concerning human rights and other sustainability issues, including environmental and diversity & inclusion.

- Suppliers 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.
- We expect that all suppliers/contractors and their suppliers and sub-contractors ensure that working conditions and remuneration of workers preserve human dignity and are consistent with fundamental principles defined and protected by the Universal Declaration of Human Rights.
- Any supplier that we identify as high risk will be subject to audit and we will work with them to implement improvements in their systems and controls as part of a corrective Action Plan.
- Any DWF individual involved in the procurement of goods and services must also demonstrate an awareness and understanding of our Slavery & Human Trafficking Statement, Anti-Slavery Policy and have completed our on line training, via The DWF Academy, providing guidance to assess the human rights and labour performance of suppliers.
- DWF is also a signatory to the Prompt Payment Code and recognises that certainty of payment enables businesses to plan for their short and longer term futures.

We are developing a Supplier Code of Conduct which sets out ethical requirements that we expect of all our suppliers. Where we suspect a breach or become aware of a case of modern slavery, we will work with the supplier to implement remedial action. DWF will terminate a relationship with a supplier or third party that are unable to demonstrate compliance or progress towards the removal of modern slavery from their business and/or supply chain.

To assess the effectiveness of our measures in ensuring that slavery and human trafficking are not taking place in any suppliers business or supply chain, we plan to develop procedures for monitoring compliance and will implement appropriate performance indicators.

We will continue to raise awareness of the requirements of the Modern Slavery Act through our internal communication channels and copy of this statement.

This statement has been approved by the Board and CSR Leadership Group.

Signed



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A handwritten signature in black ink, appearing to read 'AL', enclosed within a thin black rectangular border.

Andrew Leatherland CEO DWF Group Plc