

# Slavery & Human Trafficking Statement 2025

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## Background

In line with our purpose and guided by our values, 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. This expectation is set out in our Code of Business Conduct and reinforced in our Supplier Code of Conduct.

The global Code of Business Conduct encourages colleagues to report, through our Speak Up policy, any actions that are unsafe, unethical, unlawful, or not in line with DWF Group policies. In practice, we are:

- Raising and maintaining employee education of the risks of modern slavery and human trafficking by continuously developing our training programmes, including mandatory training on business conduct and ethics.
- Implementing new processes, a revised approach to sustainable procurement and strengthening our supply chain assurance and due diligence.
- Collaborating across sectors to gain insight.
- Use our networks, including the UN Global Compact, to gain insight and raise awareness of these topics on a global scale.

## Governance

DWF supports the principles of Human Rights set out in the Universal Declaration of Human Rights (“the Declaration”), the International Labour Organisation (ILO) core labour standards.

Our ESG & Sustainability strategy is central to how we operate and ensure we are a responsible business. Our approach and how we manage risks in relation to; human rights, human trafficking, child and forced labour is overseen by our Executive Board.

We continue to make public commitments and disclose our approach to human rights, human trafficking, child and forced labour. We do this by reporting in line with the Global Reporting Initiative (GRI), Sustainability Accounting Standards Board (SASB), World Economic Forum Metrics, and UN Global Compact Communication on Progress. Furthermore, we have been accredited ‘Silver’ by EcoVadis.

We continue to monitor developments in relation to UK, European and International frameworks relating to environmental, social and governance issues including Global Reporting Initiative, United Nations Sustainable Development Goals, Corporate Sustainability Reporting Directive, UK Sustainability Reporting Standards and Corporate Sustainability Due Diligence Directive.

## Policies

Our Code of Business Conduct set out clear expectations, reinforced through the following policies available to all colleagues. These policies visibly reflect our commitment to responsible business policies and practices that are fair, transparent and inclusive and are those relevant to this statement:

- Anti-bribery & Corruption
- Dignity at Work
- Diversity, Equity & Inclusion
- ESG & Sustainability
- Human Rights & Modern Slavery
- Safeguarding
- Speak Up
- Sustainable Procurement

Our employment policies and pre-employment screening processes make sure that all our colleagues have the appropriate right to work and are employed in accordance with local employment legislation.

## Commitments

In the UK, we are accredited as a Living Wage Employer, and we are committed to applying the equivalent standards in place in the other jurisdictions in which we operate. We continue to work towards our goal to confidently state that 100% of DWF colleagues globally are paid at a level that is in keeping with our standing as a Real Living Wage employer in the UK.

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 via our Speak Up policy. We publicise and actively encourage use of the Speak up policy and all colleagues undertake mandatory training on Conducts & Ethics annually.

The Code of Business Conduct reinforces our zero-tolerance approach to:

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

All DWF suppliers must implement a zero-tolerance approach to human rights, human trafficking, child and/or forced labour and to comply with all local and national laws and regulations.

## Supply Chain

Our goal is to build trust and open relationships with our supply chain and work together to develop our approach to responsible sourcing and sustainable procurement. Expectations of suppliers is categorised into six key areas:

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

If there is a situation where a supplier may fall short within one of more of these areas, the Code requests that we must be notified immediately. We will work with the supplier on the development of an improvement plan. If the issue is serious enough or cannot be resolved in a reasonable period, we may review the provision of goods or services and ultimately discontinue the relationship.

## Training and awareness

We continue to enhance our awareness to improve understanding of modern slavery so all our colleagues can support in the fight against it. Our training covers:

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

Modern Slavery training forms part of our mandatory learning as part of our mandatory Conduct & Ethics module that is applicable to all colleagues and new starters and learning needs revisiting once a year.

Through a new ESG Hub, part of the online DWF Academy, we provide information and resources including all training that is available through our membership of the UN Global Compact including human rights and modern slavery.

## Stakeholder engagement

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

We recognise the importance of our stakeholder engagement and we are proud to be a signatory to the United Nations Global Compact (“UNGC”) and Women's Empowerment Principles. We have taken part in and provided a plan for Human Rights Due Diligence to the UNGC. We collaborate within UNGC through various working groups including on human rights.

## Code of Business Conduct

Our Business Code of Conducts outlines the principles and guidance to ensure our colleagues deliver on our purpose and help sustain a work environment that is open, inclusive and fair for all, keeping integrity at the heart of our culture.

Our Business Code of Conduct is reviewed at least annually and published externally on our website. Our 2025 version is available [here](#)

## Raising concerns

Our Speak Up policy outlines the process to raise a concern about wrongdoing, safe in the knowledge that we address investigations promptly and effectively and will be looked at on a case by case basis. An independent supplier manages our online and phone-based system, enabling colleagues to raise a concern about a genuine suspicion of malpractice or wrongdoing within the DWF Group or with any of our external stakeholders without receiving detrimental treatment including dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

## Measuring effectiveness

We continue to review and report on the following indicators to assess the effectiveness of our actions:

Measurement	FY2024/25
Incidences of Modern Slavery in our operations	0
Incidences of Modern Slavery in our supply chain	0
Number of colleagues trained in relation to modern slavery and human trafficking	3,829
Incidents of Modern Slavery reported through our Speak Up line	0

Additional developments to support our actions in the last 12 months are:

- Progressing our Human Rights Due Diligence Action Plan
- Implementing improvements to increase understanding and awareness of the ability to Speak Up in our supply chain
- Initiating a wider ESG Procurement & Supply Chain programme which includes improving due diligence and supplier onboarding
- Developing a new ESG Supplier Onboarding Policy
- Engaging with our supply chain through a new quarterly Supplier Newsletter
- Participating in a UN Global Compact Working Group focusing on Human Rights
- Supported clients through our ESG and Legal Advisory practice in relation to ethics and human rights
- Providing pro bono advice in line with our commitments on a range of areas including human rights and ethics

## Next steps

We are monitoring the developments and requirements from UK Government in relation to Section 54 of the Modern Slavery Act, reviewing the updated guidance and taking action to ensure that we comply with any changes for the next reporting year and future years.

Through our Human Rights Due Diligence Action Plan and wider ESG Procurement & Supply Chain programme, we will:

- Improve due diligence in our supply chain through audits and questionnaires
- Continue to increase awareness of the ability to Speak Up in our Supply Chain
- Finalise a new ESG Supplier Onboarding Policy and associated risk assessment framework

We continue to monitor developments in relation to existing and forthcoming regulations including Modern Slavery Act, Corporate Sustainability Due Diligence Directive and Corporate Sustainability Reporting Directive.

We will continue to work collaboratively through key networks and agencies including UN Global Compact to develop internal capacity and understanding.

We will increase engagement with our suppliers to collaborate on education and training and continue to identify opportunities to deliver positive outcomes with our colleagues, clients and communities

Matthew Doughty

Group CEO and director of Aquila Topco Limited and designated member of DWF Law LLP and DWF LLP  
23<sup>rd</sup> September 2025

*The Directors of Aquila Topco Limited approved this statement on 23<sup>rd</sup> September 2025.*

*The Designated Members of DWF Law LLP and DWF LLP approved this statement on 23<sup>rd</sup> September 2025.*

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