



# **SLAVERY AND HUMAN TRAFFICKING STATEMENT 2016**



This statement is published on behalf of DLA Piper International LLP and DLA Piper UK LLP pursuant to Section 54(1) of the Modern Slavery Act 2015. References to “DLA Piper”, “we”, “us”, “our” or the “firm” are to these named entities.

## INTRODUCTION

DLA Piper is committed to the highest standards of professionalism, ethical behaviour and integrity in everything we do and to contributing to the wellbeing of communities around the world. In this we are committed to opposing modern slavery in all its forms, and do not tolerate it either within our business itself or within our supply chain.

## OUR ORGANISATION STRUCTURE

DLA Piper International LLP and DLA Piper UK LLP are part of DLA Piper, a global law firm operating through a number of separately constituted and regulated legal entities which provide legal and other client services in accordance with the relevant laws of the jurisdictions in which they respectively operate. Further information about the DLA Piper global law firm can be found [on our website](#).

DLA Piper is a professional services provider, which predominantly employs professionally qualified and highly skilled people. We consider the risk of Modern Slavery occurring within our business to be low.

## OUR POLICIES

DLA Piper is committed to being a responsible business and is a signatory to the United Nations Global Compact (“UNGC”). As part of our commitment to the UNGC we produce an annual ‘Communication on Progress’ against the UN Global Compact ten universal principles and broader UN development goals, the latest published version can be found [on our website](#).

Our Human Rights & Modern Slavery Policy (“Policy”) makes explicit our commitment to the United Nations Guiding Principles on Business and Human Rights,

endorsed by the International Bar Association. This Policy confirms our commitment to respect and support international human rights, and in particular to the International Bill of Rights and the International Labour Organisation’s Declaration on the Fundamental Principles and Rights at Work.

The Policy has been updated in conjunction with this statement and specifically confirms a commitment to addressing modern slavery in the following terms:

“Modern slavery can take various forms, including slavery, servitude, child, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain and are gross violations of fundamental human rights.

DLA Piper is committed to acting ethically and with integrity in all our business dealings and relationships. We are also committed to transparency in our business, in our approach to modern slavery and to implementing and enforcing systems and controls designed to ensure modern slavery is not taking place in our business or in any of our supply chains.”

We comply with all applicable employment law relating to employee terms and conditions, including pay, and are committed to the following core values in connection with our people:

- we value diversity and respect for the individual;
- we believe in teamwork for the good of the firm and our clients; and
- we believe in the development of all our people and rewarding achievement fairly.

The ‘People’ pillar of DLA Piper’s Global Strategy articulates our commitment to develop the capability of our people and help them to realise their potential

by achieving a consistently high standard in managing, training and supporting them and developing their careers.

## **OUR SUPPLY CHAINS AND DUE DILIGENCE PROCESSES**

DLA Piper expects our suppliers to adopt the same high standards that we adhere to and have fair employment practices. This is reflected in our Sustainable Procurement Policy and Ethical Code of Conduct with which we expect our suppliers to comply. The Ethical Code of Conduct specifically requires, amongst other things, that our suppliers ensure their employment is freely chosen, child labour shall not be used, living wages are paid and working hours are not excessive.

Our principal third party suppliers are businesses which supply services related to the running of our premises (such as cleaners, caterers and security), IT and technology, stationery and supplies, and professional services needed to deliver our legal services to clients.

To initiate the process of identifying and assessing any actual or potential involvement in modern slavery in our supply chain we have categorised suppliers according to factors that might indicate a high risk of modern slavery, including the location from which services are provided or goods are manufactured and the sectors or activities which present a high risk of modern slavery. To do this we have drawn on internal and independent external human rights expertise and sought to involve meaningful consultation with relevant stakeholders. We have applied this method to supplier data captured by our international procurement team and will seek to build on this to gain visibility further into our supply chain.

Key suppliers to DLA Piper also submit information about themselves via an on-line portal, to which questions have been added to assess a commitment to operating a fair and ethical workplace and identifying potential issues relating to modern slavery. Our Procurement team can use this data to assess risk and inform decisions when selecting suppliers.

Our standard contract terms contain a clause by which suppliers commit to respecting and supporting international human rights and warrant that they will comply with their obligations under the Modern Slavery Act or any other similar legislation. We also reserve the right to terminate agreements with immediate effect where the supplier commits a material breach. Breach of the clause dealing with modern slavery is separately identified as grounds for termination.

DLA Piper also has formal relationships with other law firms around the world in countries where the DLA Piper global law firm does not have an office. These “relationship firms” are not part of the DLA Piper global law firm (see our organisation structure above) but details about them can be found [on our website](#). Due diligence was undertaken on these firms prior to the relationships being formalised, all are regulated professional firms in the countries where they do business and are committed to high ethical standards under the various agreements between them and DLA Piper.


## **PERFORMANCE INDICATORS**

We have identified that the parts of our business and supply chain that carry a potential risk of modern slavery are predominantly those which involve smaller suppliers providing goods and services outside the UK. The steps we are taking to assess and manage these risks are outlined in this statement.

We formally meet with each of our key suppliers at least annually. The frequency of these meetings is dictated by a number of factors, including consideration of the risks posed by involvement in modern slavery. Our standard contract terms contain a contractual right to audit our suppliers.

## **TRAINING**

DLA Piper has employed a dedicated business and human rights lawyer to assist in raising awareness and building capacity around emerging law and practice relating to business and human rights generally. In relation to



modern slavery, we have begun integrating findings from our assessment, referenced above, across internal functions and processes. This includes by raising awareness and understanding of potential risks and how to manage those risks across relevant business functions, specifically our risk, compliance, central procurement and responsible business teams.

Training and communications for our central procurement team have focussed on the development of processes for understanding and managing the risks within our key supply chains. Over the next 12 months we plan to focus our attention on our offices outside of the UK.

We are also developing suitable training solutions on business and human rights for the generality of our people, and for the future induction of those joining our firm. Specific training on modern slavery, including how to identify high risk areas and suppliers and how to flag and manage potential issues, will be developed for our central procurement team and for those with relevant procurement responsibilities outside the UK.

## **BOARD APPROVAL**

The DLA Piper Board approved this statement on behalf of the members on 25 October 2016.



Simon Levine, Managing Partner

[www.dlapiper.com](http://www.dlapiper.com)

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