



## Slavery and human trafficking statement

### Introduction from Senior Partner

Our most significant contribution to a prosperous and sustainable future must be to uphold, protect and strengthen the rule of law so that everyone can benefit from the fairness and certainty which it brings. At a time of global uncertainty, Linklaters' purpose, delivering legal certainty in a changing world, is more important than ever and emphasises our commitment to this cause. Combined with our values, which include mutual respect, acting with integrity and considering ourselves a single, inclusive team, our alignment to the Sustainable Development Goals, reminds us how much of our work addresses some of the planet's greatest social challenges, often – but not solely – through our extensive pro bono programme. This client work is matched by a commitment to running our own operations responsibly. We are committed to ensuring that slavery, human trafficking, child labour and, indeed, any abuse of human rights have no place in or around our organisation and I am pleased to reinforce that commitment through this statement.

### Background and governance

We are an integrated global law firm, established and operating as a limited liability partnership under English law with branches and related local entities across the world. The firm is owned by our partners, and has a global management team who ensure that all our offices and practices work together effectively to achieve our goals.

This statement is published on behalf of Linklaters LLP and its wholly owned subsidiary, Linklaters Business Services (“**LBS**”) (pursuant to the Modern Slavery Act 2015 (the “**Act**”), each having a turnover in excess of £36m and references to “we”, “us”, “our”, “Linklaters” or the “firm” are to both. This statement is published in reference to the firm's 2019-20 financial year, which ended on 30 April 2020.

Linklaters' Modern Slavery Working Group, made up of representatives from our Legal & Risk, Human Resources, Corporate Responsibility and Sourcing and Supply teams, monitors and assesses the firm's ongoing progress in ensuring that slavery and human trafficking are not occurring within its business or supply chain. This statement is drafted by our Legal & Risk team and then approved by the firm's Corporate Responsibility Committee (a delegated sub-committee of the Partnership Board) and signed by the Senior Partner and Managing Partner.

### Our due diligence processes for slavery and human trafficking

The Act defines modern slavery as “slavery, servitude, and forced or compulsory labour” as well as ‘human trafficking’ (“**Modern Slavery**”). We have not identified any examples of Modern Slavery within our business or supply chain in the last twelve months.

### Within our business

As a professional services organisation, we consider the risk of Modern Slavery existing within our business to be low.

Linklaters is a signatory to the United Nations Global Compact (“**UNGC**”), reporting annually on progress on the UNGC ten principles through a publicly available “**Communication on Progress**”. Principle one is ‘the protection of internationally proclaimed human rights’, and principle four is “the elimination of all forms of forced and compulsory labour”. We are pleased to have reported good progress against both in the past twelve months, primarily by undertaking related pro bono work supporting the rights of minority groups across the globe.

Our **statement of intent on human rights** makes explicit our commitment and clarifies our ambition. The statement endorses the United Nations Guiding Principles on Business and Human Rights and supports the principles contained within the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Our global Modern Slavery policy sets out our zero-tolerance approach to Modern Slavery in our organisation and supply chain, and highlights the steps that our staff can take if they are concerned about any such type of behaviour.

We comply with all applicable employment legislation relating to employee terms and conditions, including pay, and we invest heavily in supporting the health and wellbeing of our staff. Within the UK, nobody who works in our offices – whether directly employed or not – earns less than the London Living Wage, and we are proud to be Principal Partners of the Living Wage Foundation, encouraging others to adopt this important commitment to fair pay. We are also signatories to the Fair Hiring Pledge, an initiative which aims to ensure the fair treatment of domestic workers in Hong Kong.

We are committed to creating a working environment where all voices are heard. Our Global Grievance and Complaints process provides an avenue and consistent approach to raising concerns within the firm. This year we intend to refresh our people's awareness of this process through targeted communications.

We encourage our people to feel empowered to call out any breaches of our policies (including any concerns related to Modern Slavery), and continue to support the use of an externally provided Whistleblowing Hotline to supplement our internal reporting channels.

#### Our supply chain

Linklaters engages suppliers for the provision of a range of goods and services in the areas of Facilities, HR, Technology, Finance, Marketing and Information Resources. These are provided to enable our lawyers to service our clients, and to support the efficient running of our firm.

We seek to partner with suppliers that adopt the same strict standards that we adhere to ourselves. We expect our suppliers to operate fair and ethical workplaces, where workers are treated with dignity and respect, and the highest standards of human rights are upheld. We have implemented a Supplier Code of Conduct which outlines the basic ethical requirements to which suppliers must adhere to do business with us, including affording employees the freedom to choose employment and not using any form of forced, bonded or involuntary labour (including child labour). We expect our suppliers to comply with the principles contained in the Supplier Code of Conduct.

Linklaters takes a risk-based approach to assessing the likelihood of the existence of Modern Slavery within our supply chain. The criteria used for this approach include factors such as origin of manufacture and the nature of services, and location from which they are provided. This enables us to categorise suppliers and identify potential areas to assess for Modern Slavery. We apply this risk assessment methodology to our UK supplier base and also globally, and no instances of Modern Slavery were identified this year. In the UK, we track ongoing compliance by our existing and new suppliers, via our supplier governance structure and supplier selection process. This year, we are launching a more formalised review of our suppliers, whereby we will undertake a review of three to five suppliers per month. Where the nature of the services provided implies a potential risk of Modern Slavery, this review will additionally incorporate our Modern Slavery questionnaire. Our international offices are also asked to apply proportionate reviews of ongoing compliance by their suppliers. The standard form contractual terms and conditions that we put in place with suppliers includes clauses that forbid the use of slavery and human trafficking.

#### Signed by:

**Charlie Jacobs**

on behalf of Linklaters LLP:

In the event that we become aware of a case of Modern Slavery occurring within our supply chain, we will work with the supplier to implement remedial action. In all cases, consideration will be given to the approach that produces the safest outcome for potential victims of Modern Slavery. We expect our suppliers to engage with us constructively and responsibly, and to demonstrate their willingness to remedy issues in a timely manner. Linklaters reserves the right to refuse to partner with suppliers that do not achieve or are unable to demonstrate progress towards the eradication of Modern Slavery within their organisations and supply chains.

#### Awareness raising and training

Our Ethical Code, which sets out the global ethical standards we expect everyone working for Linklaters to meet, makes clear our commitment to our role in building a fairer society. It also provides clear guidance to everyone at Linklaters regarding the high standards of professional behaviour expected of them, including treating everyone within and outside the firm with respect. A copy of Our Ethical Code is given to new joiners to the firm. Risk trainings offered this year to different teams within the firm discussed the importance of adhering to Our Ethical Code at all times.

Modern Slavery, with a focus on its relevance to Linklaters and our business, is included in the induction training delivered to new joiners to the firm.

We have also continued to run additional outreach sessions with key suppliers.

#### Board approvals

Linklaters' Corporate Responsibility Committee approved this statement on behalf of the members of Linklaters LLP on 11 June 2020.

The Directors of LBS approved this statement on behalf of LBS on 9 July 2020.

#### Signed by:

**Gideon Moore**

on behalf of Linklaters LBS:

## Key contacts



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<sup>Δ</sup> Office of Zamakhchary & Co. Linklaters in agreement with Zamakhchary & Co.

<sup>ΔΔ</sup> Linklaters Shanghai and Linklaters Zhao Sheng (joint operation office with Zhao Sheng Law Firm)