

## Modern Slavery and Human Trafficking Statement: 2022-2023



### Introduction from Senior Partner and Chair

Linklaters is committed to ensuring that Modern Slavery, human trafficking and, indeed, any abuse of human rights have no place in our organisation or in our supply chain. I am pleased that we are reinforcing that commitment through this statement and through the progress made in the last 12 months. Responsibility is at the heart of how we operate as a leading global law firm. We address and champion human rights extensively through our advice to our clients and through our pro bono programme. We also have an equivalent commitment to running our own operations to the highest standards. Our values – which include mutual respect, acting with integrity and working as one, inclusive team – underpin these commitments. This is our eighth Modern Slavery Statement. We recognise it is imperative to remain vigilant to Modern Slavery risks, and challenge ourselves to apply greater rigour and accountability in our approach to how these are addressed. As a business, we continue to monitor existing and upcoming measures to tackle Modern Slavery, both in the UK and on the international stage, and welcome the opportunity to learn from and champion these measures wherever we can.



A handwritten signature in black ink, reading 'Aedamar Comiskey'.

**Aedamar Comiskey**, Senior Partner and Chair, Linklaters LLP

We are particularly conscious that, as a global law firm, our supply chain is an aspect of our business with potential for exposure to Modern Slavery. I am pleased by how much our refreshed Responsible Sourcing programme has achieved since its launch in 2022 and we are committed to maintaining that pace of progress, including in respect of the sourcing of construction, fit-out and furnishing services as part of the move to our new head office, 20 Ropemaker, in London. We see too how other parts of our business inform our work on Modern Slavery, not least our ESG Practice, which advises clients on related issues and broadens our understanding of how we can best address Modern Slavery as an organisation.

I close by reiterating our commitment to further strengthening the systems and initiatives we have in place to prevent Modern Slavery from occurring within both our business and our supply chain and to ensuring that these processes have a real and measurable positive impact.



### 1. Background to this statement

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 (the “**Act**”). It sets out the steps taken during our last financial year (1 May 2022 – 30 April 2023) to ensure that slavery and human trafficking is not taking place in our supply chain or in our own business. It is published on behalf of Linklaters LLP and its wholly-owned subsidiary, Linklaters Business Services (“**LBS**”), and references to “we”, “us”, “our”, “Linklaters” or “the firm” are to both.

This statement has been approved by the firm’s Corporate Responsibility Committee (a delegated sub-committee of our Partnership Board) and signed by our Senior Partner and Chair, and Firmwide Managing Partner.

Our previous Modern Slavery and Human Trafficking Statements can be viewed [here](#).

The Act defines Modern Slavery as “slavery, servitude, and forced or compulsory labour” as well as “human trafficking”, which are collectively referred to as “**Modern Slavery**” in this statement.



## 2. Our structure and supply chains

Linklaters is 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. Our lawyers advise on multi-jurisdictional projects and transactions from 31 offices in 21 countries. The firm is owned by our partners, with a global management team who ensure that all our offices and practices work together effectively to achieve our goals.

As a firm we engage suppliers for a wide range of goods and services. Our largest supplier categories, typically accounting for over 70% of our total influenceable supplier spend, include Facilities (including catering, cleaning, security and

maintenance), Human Resources (including recruitment and training) and Technology (including the provision of equipment to our people and systems/software for our operations). We segment our supply base and deploy a supplier relationship management framework across our key suppliers to foster greater transparency and collaboration. The firm's relationship with its suppliers across our Global Head Office and UK network is overseen by a dedicated Strategic Sourcing and Supplier Management team. Our local suppliers are managed by colleagues based in the relevant office for service provision, such as facilities management, catering and travel services.



## 3. Our policies

Linklaters is a signatory to the United Nations Global Compact ("UNGC") and we respond annually on our progress against the UNGC 10 principles. Principle one is "the protection of internationally proclaimed human rights", and principle four is "the elimination of all forms of forced and compulsory labour". Our [statement of intent on human rights](#) also 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 Organization's Declaration on Fundamental Principles and Rights at Work.

We are committed to championing these principles, and one of the key ways in which we do so is by channelling the legal skills and expertise of our people to those organisations and individuals in need of help. Over the last year our lawyers have continued to dedicate time to multiple pro bono projects in this space. We collaborated with our long-term partner, Lawyers Without Borders, on numerous matters globally, including the creation of interactive training and resource materials for Liberian labour inspectors tasked with ensuring compliance with new domestic labour and anti-trafficking laws. Our lawyers in Hong Kong have continued to support HELP for Domestic Workers, facilitating the mass-digitisation of HELP's case record systems and working to flag indicators of human trafficking during individual case reviews. In the United States we continued to act for individual survivors of trafficking through our partnership with Sanctuary for Families, and our lawyers in Bangkok provided employment law support to the Global Alliance Against Traffic in Women.

Within the firm, our Modern Slavery Policy also sets out our commitment to advancing human rights principles and standards, upholding the rule of law and preventing human rights abuses, including Modern Slavery. It applies globally to all staff working for the firm, including employees, partners, consultants, agency staff and contractors. The Modern Slavery Policy directs to guidance about what constitutes Modern Slavery and potential indicators of Modern Slavery. It reminds all of our people of their responsibility to prevent, detect and

report any concerns they may have in relation to Modern Slavery within our business or supply chain at the earliest possible stage, highlighting the practical steps that our staff can take if they are concerned about the existence of any such type of behaviour. Our Modern Slavery Policy sits alongside our [Ethical Code](#) (which sets out our global ethical standards and compliance responsibilities and how they are supported by our purpose, culture, values and behaviours), our global Regulatory Reporting Policy and our Global Whistleblowing Policy.

We partner with suppliers which share our strong and accountable commitments to respecting human rights. We expect our suppliers to operate fair and ethical workplaces, where workers are treated with dignity and respect, and where the highest standards of human rights are upheld. Our Supplier Code of Conduct and Responsible Sourcing Policy, both of which we make publicly available on our [website](#), set out our approach to ensuring Modern Slavery is not tolerated in our supply chain. Both documents outline the basic ethical requirements to which our suppliers must adhere, including affording employees the freedom to choose employment and not using any form of Modern Slavery. We require our suppliers to comply with the principles contained in the Supplier Code of Conduct, as well as the specific obligations on Modern Slavery contained within our supplier contracts. Suppliers contracting with Linklaters are also expected to promote the principles of our Supplier Code of Conduct in their own supply chains.

As a firm we recognise the importance of continually improving our processes and ways of working to ensure that they are efficient and reflective of the latest industry thinking. Over the past 12 months we have refined our Responsible Sourcing programme by reaffirming our priority areas in relation to supply chain sustainability, including Modern Slavery. Our approach focuses on the implementation of our Responsible Sourcing Policy, Supplier Code of Conduct and internal Responsible Sourcing playbook. Our aim is to ensure that responsible sourcing is fully embedded into our end-to-end sourcing process, including how we contract, collaborate with and monitor our supply chain.



## 4. Risk Assessment and Due Diligence Processes

### Within our business

As a professional services organisation which is regulated in the various jurisdictions in which we operate and which primarily employs lawyers and business professionals, we consider the overall risk of Modern Slavery existing within our own business to be low. We have an internal, cross-functional Modern Slavery working group that keeps this assessment and the related preventative measures detailed below under ongoing review. We deploy a number of due diligence measures throughout our recruitment and employment processes to ensure that we remain diligent and proactive in ensuring there is no Modern Slavery occurring within our business. 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, everyone who works in our offices – whether directly employed or not – earns at least the “Real Living Wage” set by the Living Wage Foundation, 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 now also supporting equivalent initiatives in Ireland, Hong Kong and the US. 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 foster a working environment where all voices are heard and encourage our people to feel empowered to call out any breaches of our policies (including any concerns related to Modern Slavery). As outlined in Section 3 above, as well as our internal Modern Slavery Policy we have a global Regulatory Reporting Policy and Whistleblowing Policy. The latter is supplemented by an external whistleblowing hotline known as “SpeakUp”, run by an independent organisation. This year the firm has run an internal communications campaign to showcase the availability of the “SpeakUp” hotline. The firm also has a Global Grievance and Complaints process, which provides a consistent approach to raising concerns within the firm (including in relation to the working environment). No instances of Modern Slavery within our business were identified during our financial year ended 30 April 2023.

**FY2024 Area of Focus:** We aim to deliver plans to raise awareness of how to raise workplace-related concerns (including Modern Slavery); provide training to our partners and HR team on how to best handle any issues that are raised; and pilot a network of volunteer “Speak-Up Guardians” who will be trained to help colleagues navigate the most appropriate route to raise or escalate concerns.

### Our supply chain

We view the risk of Modern Slavery existing within our supply chain as being greater than within our own business. Accordingly, we have put in place a robust supplier governance model to address this and ensure Modern Slavery is not tolerated within our supply chain. Our Responsible Sourcing programme is managed by our Responsible Sourcing Lead, whose role is to continually develop our risk-based approach to responsible sourcing, including refinement of our due diligence processes, and building a robust framework to assess (and act on, where appropriate) supplier scorecards. For example, we have developed a Responsible Sourcing Supplier Onboarding Questionnaire which is issued to all new suppliers onboarded

by our Strategic Sourcing Team. The questionnaire covers our priority pillars, including Modern Slavery, and assesses the supplier’s performance against our Responsible Sourcing standards and requirements.

We take a risk-based approach to segmenting our supply chain and have implemented further due diligence processes in the supplier relationship management framework for our key suppliers and for those suppliers where the potential risk of Modern Slavery is considered to be higher.

For our key suppliers, our primary assessment tool is EcoVadis, a sustainability ratings platform, which provides us with greater transparency of the sustainability progress of our suppliers (including risks associated with Modern Slavery). We are currently monitoring a portfolio of 93 suppliers on EcoVadis, who account for over 80% of our strategic supply chain spend. We strive to embed a pro-active and collaborative approach to managing the threat of Modern Slavery throughout our global supply chain, and our investment in tools such as the EcoVadis platform enables us to be more efficient and rigorous in our approach.

Through the EcoVadis platform we are also able to review key supplier policies, actions and results in directly relevant areas such as working conditions, child labour, forced labour, human trafficking, and supplier social practices. In addition, we use the platform’s media monitoring functionality to keep up to date with supplier news relating to human rights.

For suppliers where the potential risk of Modern Slavery is considered to be higher – for example where the EcoVadis scorecard on a particular supplier suggests an area of poor performance or of general concern, or where a supplier is operating in a high-risk category – we conduct a further deep-dive review on the supplier in question. During our financial year ended 30 April 2023, 21 suppliers were issued with the Linklaters Modern Slavery Supplier Questionnaire as part of that further review. This allows us to understand in more detail the degree of Modern Slavery risk and further potential mitigation/corrective actions required. The Questionnaire includes factors such as origin of manufacture of goods, the supplier’s recruitment practices, and Modern Slavery measures and controls in place within the supplier.

As at the date of this statement, no cases of Modern Slavery had been identified across this cohort of suppliers. As a firm we will continue to monitor supplier responses to EcoVadis and to our questionnaire and take appropriate action where necessary.

In the event that we become aware of a case of Modern Slavery actually occurring within our supply chain, we will work with the supplier to implement remedial actions. 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, and this is made clear in our Supplier Code of Conduct and our contractual terms and conditions. Linklaters reserves the right to refuse to partner with, and ultimately to terminate any existing relationship with, suppliers that do not achieve or are unable to demonstrate progress towards the eradication of Modern Slavery within their organisations and supply chains.

Overall, no instances of Modern Slavery within our supply chain were identified during our financial year ended 30 April 2023.

## Case study: 20 Ropemaker – Linklaters' new London premises

Our new London headquarters will be located on 20 Ropemaker Street, London. Anticipated to be ready for occupancy in early 2026, the building design aligns with our sustainability, inclusivity and wellbeing aspirations, reflecting the values important to both our people and our firm. We are targeting the highest possible BREEAM sustainability and WELL occupant health and wellbeing rating.

We will take up our lease and commence fit-out works in Spring 2024. The relocation to our new headquarters is a strategic project for the firm, and we acknowledge that successful delivery will involve collaborating with suppliers in various high-risk sectors associated with Modern Slavery, particularly construction fit-out. In line with our Responsible Sourcing practices, we have implemented project-specific measures including:

- > Initiating early engagement with specialist designers and advisors to foster a sustainable design specification and to minimise any known risks associated with selected materials and their supply chains.
- > Integrating project-specific responsible sourcing tender questions relating to Modern Slavery due diligence and transparent supply chain management – allowing the project team to make informed sourcing decisions that align with the firm's human rights and ethics goals.
- > Cascading Linklaters' Supplier Code of Conduct and Modern Slavery contractual requirements down the project's supply chain. This includes the project delivery partner conducting periodic spot checks and, where appropriate, third-party audits on their supply chain.
- > Where appropriate, requiring suppliers to designate a sustainability lead and arrange a contract kick-off meeting focused on sustainability (including Modern Slavery) considerations.
- > Seeking opportunities to foster collaboration and innovation with project suppliers, going beyond contractual commitments and baseline requirements.



## 5. Measuring effectiveness

Measuring effectiveness to us means critically assessing whether the measures we deploy to counter Modern Slavery are having practical and positive impacts and using this to inform our future planning. We actively monitor developments in the market for external sustainability-driven ratings, to ensure that we remain aware of developing standards and expectations in this space and strive to meet those. We use external indicators such as our own Silver EcoVadis rating and identify focus areas for the year ahead (such as the planned continuation and development of our Supplier Summit initiative, as outlined in Section 6 below).

The EcoVadis platform and supplier scorecards also help us to measure our effectiveness in combatting Modern Slavery in our supply chain. The EcoVadis methodology is built up using indicators including policies, endorsements, reporting, certifications and media coverage. The indicators provide a range of datapoints that we as a firm use to track, influence and continuously improve our effectiveness in monitoring and eradicating Modern Slavery within our supply chain (and further, which we use to inform our approach within our own business and ensure we are setting a high standard). Our current set of labour and human rights datapoints indicates the proportion of our suppliers with the following relevant measures in place:

As our Responsible Sourcing programme develops, we are seeing an increase in the number of our suppliers which are monitored via the EcoVadis platform. The composition of our group of monitored suppliers is also changing accordingly; in particular, we are now engaging through EcoVadis with members of our supplier base which are smaller and/or at an earlier stage on their sustainability journey. We believe this is important progress, but recognise that the increasing representation of these suppliers within a larger, more diverse portfolio is also part of the driver for the year-on-year changes and reductions in the figures shown in the table. Further detail on this is set out in Section 6 below.

Ultimately, we want to engage with all cohorts of our supply chain and recognise the role we can play as a vehicle for change. As a result, we expect our supplier compliance figures on the datapoints above to continue to develop over the coming years – and we will continue to monitor, expand and act on this data on an ongoing basis.

**FY2024 Area of Focus:** Based on the labour and human rights data monitored through EcoVadis, we will develop targeted initiatives for the smaller/less advanced (on sustainability) participants in our supply chain, where we believe it would be beneficial and impactful to do so, to support them in bolstering measures against Modern Slavery.

	2022*	2023**
Suppliers with an active whistleblowing policy on Human Rights issues	82%	73%
Suppliers reporting on labour and human rights issues	42%	42%
Suppliers who audit or assess their supply chain on CSR issues	67%	63%
Suppliers who are a UN Global Compact signatory	55%	55%

\* 2022: Based on available data from across 80 EcoVadis scorecards.

\*\* 2023: Based on available data from across 93 EcoVadis scorecards.





## 6. Awareness raising, training and capacity building

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 and being uncompromising in our integrity. A copy of our Ethical Code is given to all new joiners to the firm. Risk training offered this year to different teams within the firm discussed the importance of adhering to our Ethical Code at all times.

All new joiners to the firm also receive induction training on their compliance responsibilities, which signposts them to our key policies, including our Modern Slavery Policy, Regulatory Reporting Policy and Whistleblowing Policy.

This year an interactive, Modern Slavery-specific, training session was delivered to our Technology team, fulfilling the commitment made in last year's Modern Slavery statement.

The session provided a reminder of what constitutes Modern Slavery, potential indicators of Modern Slavery, and workshopped ways in which the firm and our people can continue to take active, practical steps to ensure Modern Slavery is not tolerated in our business or in our supply chains. Recognising that through the design and fit-out of our new London HQ, 20 Ropemaker, we would be engaging suppliers in several higher-risk sectors, and the pivotal role that our Operations team will play in identifying and managing potential Modern Slavery risk throughout the project, we adjusted our training schedule and delivered a similar interactive Modern Slavery-specific training session for our Operations team this year. Further training for our HR function was therefore rescheduled and is now expected to take place later in 2023.

Fulfilling the aim set out in our previous Modern Slavery statement, we also held our inaugural Supplier Sustainability Summit in June 2023. A selection of our key suppliers, all of varying sizes and categories of spend, attended this in-person event. Our goal was to enable discussion and collaboration opportunities to ensure our supply chain is a reflection of our own ethos and commitment to preventing and combatting Modern Slavery. The Summit included panel discussions around our Responsible Sourcing priority pillars (Environment, Human Rights, DE&I and Source+) and concluded with three roundtable sessions – one of which focused specifically on Human Rights (Modern Slavery), exploring how to increase supply chain transparency and accountability in relation to Modern Slavery and to better understand our suppliers' experience and challenges of cascading Modern Slavery requirements down their own supply chains. The insights gained from the Summit, including some of the challenges experienced by the smaller/less advanced (on sustainability) participants in our supply chain, have fed directly into our medium-term Responsible Sourcing roadmap.

**FY2024 Area of Focus:** We will host another summit or sustainability-focused event with more targeted cohorts of our supply chain, such as small-business suppliers or suppliers from a specific category of spend, on an annual basis, and with a continuing focus on Modern Slavery.



## 7. Tracking our progress

FY2023 Areas of Focus	Status	Commentary
We committed to further refining our approach to Responsible Sourcing, reaffirming our priority areas in relation to Modern Slavery, and focusing on the implementation of our refreshed Responsible Sourcing Policy, Supplier Code of Conduct and internal Responsible Sourcing playbooks.	In progress	This commitment is ongoing. See Sections 4 and 5 of this statement for detail.
We stated our intention to work towards setting a minimum threshold for supplier Labour and Human Rights scores on the EcoVadis ratings platform.	In progress	Progress is being made in this area. See Section 5 of this statement for detail.
We committed to monitor, expand and act on the set of labour and human rights datapoints from EcoVadis scorecards on an ongoing basis to ensure continuing improvement of anti-Modern Slavery Compliance.	In progress	See Section 5 of this statement for detail.
We targeted the preparation and roll-out of a Modern Slavery-specific training session to further key teams within Linklaters that engage with suppliers in areas where there could be a risk of Modern Slavery, including HR and Technology.	In progress	Roll-out of this training is ongoing. See Section 6 of this statement for detail.
We stated our aim to have a greater advocacy role within our supply chain, to proactively encourage discussion and collaboration opportunities to ensure our supply chain is a reflection of our commitment to preventing and combatting Modern Slavery, and to host a supplier forum focusing on cultivating a responsible supply chain.	In progress	We successfully delivered our inaugural Supplier Sustainability Summit in June 2023. See Section 6 of this statement for detail.

Key:



Completed



In progress



Not met



## 8. Board approvals

Linklaters' Corporate Responsibility Committee approved this statement on behalf of the members of Linklaters LLP on 22 September 2023.

Signed by:

**Aedamar Comiskey**

on behalf of, and as a Designated Member of, Linklaters LLP

The Directors of LBS approved this statement on behalf of LBS on 29 September 2023.

Signed by:

**Paul Lewis**

on behalf of Linklaters Business Services

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