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. By solving their most complex and important legal issues, our advice enables many of the world’s leading organisations to achieve their objectives. We are committed to using our professional expertise with integrity and to sharing it pro bono to advance broader social issues. Our positive contribution to the work of our clients is matched by our commitment to running our own operations responsibly. We are committed to ensuring that slavery, human trafficking, child labour—indeed, any abuse of human rights—have no place in or around our organisation and are pleased to reinforce that commitment through this statement.”

Charlie Jacobs, Senior Partner

Background

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.

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”).

As a professional services organisation, we consider the risk of Modern Slavery existing within our business to be low. However, as described in our July 2016 Slavery and Human Trafficking Statement, we carried out a due diligence programme with a primary focus on operations managed from our UK Head Office. In the last twelve months, we have expanded this due diligence to other jurisdictions in which we operate.

We have not identified any examples of Modern Slavery within our business or supply chain in this period.

Within Linklaters

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.

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 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. This policy was launched in the UK in 2016 and was implemented globally in May 2017.

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 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.
Our supply chain
We seek to partner with suppliers that adopt the same strict standards that we ourselves adhere to. 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.

Linklaters has developed a risk-based approach to assess 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, and location from which, services are provided. This enables us to categorise suppliers and identify potential areas to assess for Modern Slavery. We have applied this risk assessment method to our UK supplier base.

We have issued Modern Slavery questionnaires to those of our existing suppliers we identified as high risk to assess their current anti-Modern Slavery policies and controls. Responses are evaluated and the risk assessment of the supplier is updated accordingly. Where appropriate, suppliers are required to develop an action plan to satisfy any identified gaps. We track progress through the agreed deliverables of that action plan. Our Modern Slavery questionnaire is issued to new suppliers of services assessed to be high risk during the on-boarding process.

Since July 2016, our Sourcing and Supply team has been engaging with our offices outside London with the aim of applying a similar risk based approach to identify whether any of their suppliers should be similarly assessed. Our Supplier Code of Conduct (the “Code”) applies to all our suppliers, and those of their subsidiaries and subcontractors that provide goods or services to Linklaters. The Code outlines the basic ethical requirements that suppliers must adhere to in order 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 confirm that their operations comply with the principles contained in the Code.

The standard form contractual terms and conditions that we put in place with suppliers globally include clauses that forbid the use of slavery and human trafficking.

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
We have produced for our staff (and made available publicly on our website), an interactive PDF which illustrates the issues surrounding Modern Slavery and its impact on human rights. It also includes examples of the risk, governance and compliance work we have undertaken for clients through our Operational Intelligence Group including how to comply with obligations under the Act and associated legislation. We have also run outreach sessions with key suppliers.

Board Approvals
Linklaters’ Corporate Responsibility Committee approved this statement on behalf of the members of Linklaters LLP on 18 May 2017. The Directors of LBS approved this statement on behalf of LBS on 6 July 2017.

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