Slavery and human trafficking statement

Introduction from Senior Partner
“Linklaters’ primary contribution to a prosperous and sustainable future is to uphold, protect and strengthen the rule of law so that everyone can benefit from the fairness and certainty which it brings. Our advice enables many of the world’s leading organisations to navigate opportunities and risks in an increasingly complex regulatory and ethical environment. 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.”

Robert Elliott, Senior Partner and Chairman

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, we commenced our own due diligence programme in October 2015, through a cross-functional working group, with a primary focus on operations managed from our UK Head Office. We intend to expand this due diligence to other jurisdictions in which we operate.

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”. 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.
We have launched a Modern Slavery policy in conjunction with this statement. This 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 has been launched in the UK and will be implemented globally in due course.
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. When responses are received, they 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 will track progress through the agreed deliverables of that action plan. Our Modern Slavery questionnaire will be issued to new suppliers of services assessed to be high risk during the on-boarding process.

In early 2016 we developed a Supplier Code of Conduct (the “Code”) which applies to all our suppliers, and those of their subsidiaries and subcontractors that provide goods or services to Linklaters. While Linklaters recognises that suppliers operate within different legal and cultural environments, our 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 contractual terms and conditions that we put in place with our suppliers globally have been updated to 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.

**Training available to staff**

We are currently focusing on raising internal awareness (to include communications via video and internal bulletins) to enable the relevant members of our business services team, and specifically our UK procurement, risk, corporate responsibility and human resources functions to understand the requirements of the Modern Slavery Act and to give them the tools to flag potential issues. We have also run outreach sessions with key suppliers.

Over time, we will seek to develop a Human Rights e-learning solution for all our staff, which will ensure that Modern Slavery is targeted more persistently, regardless of staff turnover or changes in the supply chain. A key focus for the next 12-18 months is engaging in more detail with our offices outside the UK, to ensure they review their supply chains and engage with the key suppliers as we have done for the UK.

We are committed to working with our suppliers to provide support and guidance when implementing anti-slavery policies, through the use of supplier workshops and fora.

**Board Approvals**

Linklaters’ Corporate Responsibility Committee approved this statement on behalf of the members of Linklaters LLP on 17 May 2016.

The Directors of LBS approved this statement on behalf of LBS on 26 May 2016.