

# Linklaters



## 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. I am delighted that this is now reflected in our purpose: delivering legal certainty in a changing world. This focus and our refreshed values complement our alignment to the Sustainable Development Goals, reminding 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.”

**Charlie Jacobs**, Senior Partner

### 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.

Linklaters’ Modern Slavery Working Group, made up of representatives from risk, human resources, corporate responsibility and sourcing and supply, monitors and assesses the firm’s ongoing progress in ensuring that slavery and human trafficking are not occurring within its business or supply chain. The Working Group meets formally at least three times a year and is responsible for drafting this statement, which is 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.

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 encourage our people to feel empowered to call out any breaches of our policies (including any concerns related to Modern Slavery), and have introduced an externally provided Whistleblowing Hotline known as “**SpeakUp**” 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 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 comply with the principles contained in the Supplier Code of Conduct.

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 methodology to our UK supplier base and have now also begun to engage with our offices outside the UK to determine what steps they may also seek to implement to assess their local supply chains.

We have issued Modern Slavery questionnaires to existing UK suppliers 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. We are now embedding the ongoing assessment of those suppliers identified as higher risk within our supplier review process.

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 and training

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, and will be updated over the next twelve months.

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. We have recently refreshed and relaunched Our Ethical Code with a global communications campaign. A copy of Our Ethical Code is given to new joiners to the firm.

We have committed to including Modern Slavery, with a focus on its relevance to Linklaters and our business, in the induction training delivered to new joiners to the firm.

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 11 May 2018.

The Directors of LBS approved this statement on behalf of LBS on 3 July 2018.

## Key contacts



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