

Modern slavery and human trafficking statement – Dentons Europe LLP and its group entities

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 on behalf of Dentons Europe LLP (the “Firm”) and its group entities (the “Group”, or “we”). The Firm is the controlling party within the Group. The statement sets out the steps the Group is taking to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. The Firm's financial year end is 31 December and this constitutes our slavery and human trafficking statement for the 2020 financial year.

CEO's statement

We recognise the suffering which modern slavery and human trafficking causes. In an increasingly global marketplace, we recognise that all businesses have a responsibility to understand whether modern slavery and human trafficking is taking place within their supply chains and this is a responsibility we take seriously.

Our organisation

The Firm is an English limited liability partnership with registration number OC316822. The Firm also operates in the UK through its subsidiary, Dentons Europe (London) Limited, and overseas through its branches, subsidiaries and affiliates.

We provide a full range of legal services to corporate clients from many sectors, including but not limited to energy, financial institutions, franchise, global private services, hotels & leisure, insurance, life sciences and healthcare, manufacturing, private equity, retail, technology, media and telecommunications, transportation and infrastructure, venture technology and emerging growth.

We are a part of Dentons, a global legal practice providing client services worldwide through its member firms and affiliates.

We had an annual turnover in 2020 in excess of £36 million.

Our supply chains include leases for the properties we occupy, catering and cleaning services, some outsourced business process services, recruitment and employment agencies and the purchase of goods including office furniture and supplies and IT software and equipment.

As a law firm, we always work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. Corporate social responsibility is an intrinsic part of our culture and we aim to make a lasting and positive impact on the communities in which we live and work. We expect the same from our suppliers and business partners.

Our policies on slavery and human trafficking

The Group is committed to ensuring we are not supplied by anyone who engages in human trafficking and modern slavery.

Compliance with laws regarding eradication of human trafficking and slavery is embedded in the Dentons Global Code of Ethics and Conduct and Dentons' Commitment to Rule of Law and Human Rights.

Our Anti-Slavery Policy has been recommended by the Firm's Chief Executive Officer and approved by the Firm's Europe Board. The Firm's Chief Executive Officer is responsible for this Policy. A team led by the Firm's Deputy General Counsel implements the Policy, working closely with all relevant business support teams, including Human Resources, Finance, Risk, IT and Procurement. The Firm's Country and Office Managing Partners are responsible for ensuring compliance with the Anti-Slavery Policy locally.

Any situations that give rise to concern from a human rights or modern slavery perspective should be reported to the Firm's Office of the General Counsel.

In 2020, the Firm's Chief Executive Officer formed the Sustainability and Governance Committee, which focuses on issues of corporate social responsibility, including environmental issues and human rights.

We also have a Whistleblowing Policy, which is published on our intranet site. If employees have concerns about any wrongdoing or breaches of law, they can raise these concerns in confidence without fear of disciplinary action.

What we are doing

Our working practices respect and uphold human rights for our partners, employees and contractors. We became a signatory of the United Nations Global Compact to confirm our commitment to its ten principles, including among others elimination of all forms of forced and compulsory labour and effective abolition of child labour.

We take the following steps to identify risks of modern slavery and human trafficking within our business and our supply chain:

- We are improving our internal processes to identify risk related to human trafficking and forced labour associated with our supply base. We are planning to carry out due diligence on relevant and appropriate suppliers by asking for information on their policies on fair sourcing of goods and services, and employment practices.
- In 2021 we have adopted a Supplier Code of Ethical Business Practices. The Code sets out the standards we expect our suppliers to uphold at all times relating to various matters including anti-bribery and corruption, human trafficking, modern slavery and ethical behavior. We ask our key regional suppliers to comply with our Supplier Code of Ethical Business Practices and uphold its principles in their own supply chains. The right to audit our suppliers is included in our Supplier Code of Ethical Business Practices.
- We are working on a programme of training on combating modern slavery and human trafficking, which will be available to staff. It will be mandatory for relevant staff involved in human resources and procurement.
- We are in the process of reviewing our procurement guidelines to appropriately reflect our commitments to human rights, including eradication of modern slavery and human trafficking.
- We will periodically review the effectiveness of the implemented measures and make such changes as may be required for ensuring that slavery and human trafficking are not taking place in our supply chains or in any part of our business.

Approval

This statement has been approved by the members of Dentons Europe LLP.



Tomasz Dąbrowski

CEO of Dentons Europe LLP (designated member of Dentons Europe LLP)