

# Modern slavery and human trafficking statement

[Dentons UK and Middle East and all group companies policy](#)

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## Modern slavery and human trafficking statement – Dentons UK and Middle East LLP and all group companies

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 on behalf of Dentons UK and Middle East LLP (the Firm) and all group companies including but not limited to Dentons UK and Middle East Legal Services (the Group, or 'we'). The Firm is the controlling party within the Group. The statement sets out the steps the Group has taken 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 30 April and this constitutes our slavery and human trafficking statement for the 2018/19 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 OC322045. We have six offices in the UK, located in London, Watford, Milton Keynes, Aberdeen, Edinburgh and Glasgow. We provide a full range of legal services to corporate clients from many sectors, including telecommunications, energy, real estate, financial services and retail.

Dentons UK and Middle East Legal Services is an English unlimited company, registration number 2746217. The company is based in London although operates throughout all the Firm's offices in the UK. The principal activity of the company is to provide staff services to the Firm.

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 2018/19 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. Please see our Anti-Slavery Policy.

The Anti-Slavery Policy has been approved by our management, and ultimately the Chief Executive Officer, as a Board Member of both named entities, is responsible for this Policy. A team led by our General Counsel, working closely with all relevant divisions within the business, including Human Resources, Finance, Facilities, Compliance, IT and Procurement, implements the Policy.

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

- We assess risk related to human trafficking and forced labour associated with our supply base. Our preliminary assessments will be based upon geography, the product or services being purchased, supplier quality performance and the nature of the business transaction.
- We carry out due diligence on all relevant and appropriate suppliers by asking for information on their policies on fair sourcing of goods and services, and employment practices. In respect of certain suppliers, we seek the right to request and receive copies of their policies.

- We have a code of ethical business practices, which we expect all suppliers to adhere to. 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, slavery, and ethical behaviour.
- We are rolling out a programme of training on modern slavery and human trafficking that will be available to staff as part of our induction training. Training on modern slavery will be mandatory for those involved in human resources and procurement.
- We will seek to impose contractual terms on our suppliers asking them to warrant that they and their suppliers are in full compliance with our Anti-Slavery Policy. We will audit our suppliers where there is deemed to be considerable risk or we have concerns of non-compliance to ensure that this is the case. The right to audit is included in all suppliers' contracts, where relevant and appropriate.

## Approval

This statement has been approved for and on behalf of the members of Dentons UK and Middle East LLP and by the Board of Directors of Dentons UK and Middle East Legal Services.



Jeremy Cohen  
UKME Chief Executive Officer of Dentons UK and Middle East LLP  
Director of Dentons UK and Middle East Legal Services

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## Modern slavery and human trafficking statement – Dentons Europe LLP

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 all group companies (the Group, or “we”). The Firm is the controlling party within the Group. The statement sets out the steps the Group has taken 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 2019 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 operates overseas through its branches in Germany, Brussels and the Netherlands.

The Firm's subsidiary, Dentons Europe (London) Limited, is an English limited liability company with small operations in London.

The Firm's subsidiary, Dentons Europe (Central Asia) Limited, is an English limited liability company which acts as the holding company for the Firm's operations in Kazakhstan and Azerbaijan.

The Firm also operates through foreign subsidiaries and affiliates in Paris, Warsaw, Moscow, St. Petersburg, Budapest, Rome, Milan, Bucharest, Luxembourg, Tbilisi, Prague, Bratislava, Kiev and Istanbul.

We provide a full range of legal services to corporate clients from many sectors.

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 2019 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 our Chief Executive

Officer and approved by our Europe Board. Our Chief Executive Officer is responsible for this Policy. The Policy is implemented by our Deputy General Counsel, working closely with all relevant business support teams, including Human Resources, Finance, Facilities, Compliance, IT and Procurement.

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

- We assess risk related to human trafficking and forced labour associated with our supply base. Our preliminary assessments will be based upon geography, the product or services being purchased, supplier quality performance and the nature of the business transaction.
- We are in the process of implementing a Supplier Code of Conduct. 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 rights, forced and child labour, equal opportunities and non-discrimination.
- We are planning to roll out a programme of training on modern slavery and human trafficking which will be available to all staff. It will be mandatory for those involved in human resources and procurement.
- We will seek to impose contractual terms on our suppliers asking them to warrant that they and their suppliers are in full compliance with our Anti-Slavery Policy. We will audit our suppliers from time to time to ensure that this is the case. The right to audit is included in all supplier contracts, where relevant and appropriate.

## Approval

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



Tomasz Dąbrowski

