

# Anti-Slavery Policy

## Combatting Modern Slavery

2016

Modern slavery is a tragic global phenomenon that we all must work together to eradicate. It is contrary to good business and destroys lives and communities. Dentons is committed to managing this issue in our own business and supply chain to make a positive impact on the people and communities we serve.

### Policy

Modern slavery can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. We cannot tolerate modern slavery in any form and we are working to address this within our business or within our supply chain. We are committed to implementing and enforcing effective systems and controls to ensure this is the case. We comply in full with our obligations under the Modern Slavery Act 2015 to publish an annual statement on the steps we are taking to counter modern slavery in our business and our supply chain.

This policy applies to all persons working for us or on our behalf in any capacity, including partners, employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of

employment and we may amend it at any time.

### Responsibility for this policy

Our Chief Executive has overall responsibility for this policy.

Our General Counsel has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring their staff understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

### Compliance with this policy

All partners and employees must read, understand and comply with this policy. Everyone working for Dentons is responsible for preventing, detecting and

reporting modern slavery if it is encountered.

If anyone becomes aware of or suspects that modern slavery is taking place, they must immediately notify our General Counsel. This applies whether or not the suspected slavery involves Dentons or one of its third party suppliers.

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

### Communication and Awareness

The Firm will provide training on this policy as part of the induction process for all individuals who are involved in the appointment of suppliers. All staff will be notified of this policy on joining and receive training as appropriate from time to time.

We will also communicate this policy to all suppliers, contractors and business partners at the outset of our business relationship with them and ensure it is reflected in our contractual arrangements with suppliers.

### Breaches

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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