

Slavery and Human Trafficking Statement October 2021

This statement is made by DAC Beachcroft LLP on behalf of itself and its wholly owned subsidiaries, DAC Beachcroft Claims Limited and DAC Beachcroft Services Limited, which operate as part of the DAC Beachcroft group. This annual statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement.

Our Business and Structure

DAC Beachcroft is a leading international legal services business with more than 2,500 people across the UK, Europe, Asia-Pacific and Latin America. Our international and UK teams of lawyers and advisors work with clients across a range of industries and are market-leaders in the insurance, health and real estate sectors. For more information about our services, please click [here](#).

DAC Beachcroft LLP is a limited liability partnership registered in England and Wales (registered number OC317852) and is the parent undertaking within the DAC Beachcroft group. The DAC Beachcroft group is made up of separately constituted and regulated legal entities, providing legal services in their respective jurisdictions.

DAC Beachcroft Claims Limited is a limited company registered in England and Wales (registered number 04218278).

DAC Beachcroft Services Limited is a limited company registered in England and Wales (registered number 05560211).

For further information on our group structure, please click [here](#).

Our Approach

We have a zero-tolerance approach to modern slavery and human trafficking and we are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or within our supply chain. Services and goods procured on behalf of our business are the result of transparent, objective, risk-based decision making processes which are compliant with all applicable laws and regulations.

Our Head of Responsible Business works with leadership teams across our network to improve the impact of our business on the societies and the economies of the regions in which we operate. For information about our Responsible Business Strategy, please click [here](#).

Our Procurement function has adopted the CIPS Corporate Code of Ethics and this year achieved an accreditation for Corporate Ethical Procurement and Supply. This ensures that our business is not, directly or indirectly, adversely affecting the environment or otherwise putting itself at risk in terms of its supply chain.

Our Policies

We expect the same high standards from those we work with and are committed to ensuring that there is no modern slavery or human trafficking within our supply chains.

We have a number of policies in place to mitigate the risk of modern slavery and human trafficking which include:

- Our Anti-Slavery policy which affirms our zero-tolerance approach to modern slavery and human trafficking, together with our commitment to being an ethical, sustainable and responsible business. Colleagues are reminded of their responsibility to report any concerns or suspicions via our Whistleblowing policy or Incident Reporting policy.
- Our Procurement policy which demonstrates our ongoing commitment to sourcing goods and services from ethical and diverse enterprises, as well as setting out the structure for our Procurement and Purchasing processes and sourcing strategies.
- Our Recruitment and Pre-Employment Screening policies which affirm our use of vetted and approved recruitment agencies only. Employees at all levels (who are engaged under a contract of employment) undergo pre-employment screening. We are an accredited Living Wage Employer and none of our colleagues are paid less than the current UK National Living Wage.
- A dedicated Wellbeing programme where colleagues have access to an Employee Assistance Programme and a wide range of other wellbeing and mental health tools so that they have the appropriate resources and support should they need it.

Our Practice Governance & Risk Group works in conjunction with both our HR and Procurement functions to ensure ongoing compliance with our policies and to manage any concerns or incidents.

Policies are reviewed annually and are available to all colleagues on our intranet.

Our Suppliers and Due Diligence

Our supply chain encompasses four core categories covering: Information and Communications Technology; Professional and Consultancy Services; Site and Maintenance Services; and Travel and Conferencing. Each of these categories support our business operations and that of our clients. Due to the nature of our business, around 60% of our supply chain relates to Professional and Consultancy Services.

As part of our procurement process, new suppliers are provided with our Minimum Commercial Terms which state that any contract we enter into with them will require certain terms to be agreed, including a warranty that no slavery is used in their business or by suppliers within their supply chain. They are also required to complete a detailed due diligence questionnaire.

Our due diligence questionnaire seeks to assess whether the supplier:

- has policies, processes and procedures in place relating to anti-slavery and unfair practices;
- operates using fair employment practices such as offering overtime on a voluntary basis;
- has taken steps to ensure that slavery and trafficking does not exist anywhere in their supply chain; and
- has systems in place to ensure compliance with the Modern Slavery Act 2015.

All suppliers (including their sub-contractors) are expected to adhere to our Supplier Operating Principles, some of which are set out below:

- Suppliers are expected to have management systems in place for delivering and monitoring contractual compliance in line with the due diligence responses for their own operations and those of their sub-contractors.
- Suppliers should comply with all relevant legislation in the countries in which they operate and all relevant International Labour Organisation conventions.
- Suppliers are expected to communicate their expectations for compliance on all the issues raised within the due diligence responses to all of their relevant employees and sub-contractors / supply chain.

Due diligence responses allow us to assess the risk of modern slavery and human trafficking in the supplier's business and their supply chain, regardless of expenditure. We use heat/risk maps to define the level of risk by considering probability and business impact. Should suppliers fail to meet our standards or be unwilling to make any changes, we will cease to engage with them.

We continue to take steps to help mitigate the risk of slavery and human trafficking in our supply chain, including:

- Obtaining contractual warranties that no slavery is used anywhere in the supplier's business or its supply chain and that all necessary processes and policies have been put into place to ensure that this remains the case;
- Adding indemnity provisions and rights to terminate for breach of our Anti-Slavery policy into our contracts;
- Ensuring risk areas are documented, monitored and taken into consideration in any future contract renewals;
- Reviewing and developing our internal supplier audit programme to introduce new categorisations for our suppliers (Critical, Key or Operational). All Critical suppliers will be required to undergo annual re-verification of their due diligence questionnaire and audit; and
- Extending risk mapping to include location, the length of the relationship and any other existing information to enable us to rate suppliers.

Our Risk Assessment

The risk of modern slavery and human trafficking occurring within our business and supply chain remains low and we have adequate controls in place to manage, monitor and mitigate such risks. Our business-wide risk assessment is reviewed periodically and updated to ensure that our controls remain appropriate and robust.

Training and Awareness

We are committed to ensuring that our staff understand what modern slavery and human trafficking is, are able to identify associated red flags and are aware of the actions they must take should they have any concerns. In addition to the policies set out above, we have a modern slavery and human trafficking e-learning module which can be accessed by all staff at any time.

Guidance issued by the National Crime Agency in 2020 highlighted that those working on immigration and conveyancing matters are likely to have higher visibility of modern slavery victims/offenders. As a

result, we introduced compulsory training to our Employment and Real Estate legal teams in addition to our HR, Finance, Procurement and Practice Governance and Risk functions.

Each year, a business-wide communication is published informing all colleagues of our modern slavery and human trafficking policy and procedures.

Measuring Effectiveness

In order to assess the appropriateness of actions taken to date and the effectiveness of our modern slavery controls, we will measure our performance as follows:

- 100% of our Procurement function to have undertaken the modern slavery and human trafficking e-learning module (by October 2022);
- 100% of our new suppliers to follow our procurement process and complete the necessary due diligence questionnaire before a contractual commitment for goods or services is entered into (by October 2022); and
- A mapping exercise of each tier of our supply chain is to be undertaken to review whether the assigned tier remains appropriate and consistent with our risk assessment of the supplier (by October 2022).

Ongoing Commitment

We will continually review our systems to ensure we have robust policies and processes in place to mitigate the risk of modern slavery and human trafficking within our business and our supply chain.

Copies of our previous statements can be found by clicking on the links below:

- [Slavery and Human Trafficking Statement – October 2019](#)
- [Slavery and Human Trafficking Statement – October 2020](#)

Approvals

This statement was approved by the DAC Beachcroft LLP Group Board on 30 September 2021 and signed by our Designated Member and Senior Partner.



Virginia Clegg
Designated Member
DAC Beachcroft LLP
25 October 2021