

Transparency in Supply Chains - Slavery and Human Trafficking Statement

October 2024

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") 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 ("DAC Beachcroft"). It sets out the steps we have taken throughout our global business to identify and mitigate the risk of modern slavery occurring within our business or supply chain for the financial year ending 30 April 2024.

1. Our Business

DAC Beachcroft is a leading international legal services business with more than 350 Partners and 2,600 colleagues within the [UK, Europe, Asia-Pacific and Latin America](#) across a range of separately constituted and regulated legal entities, providing legal services in their respective jurisdictions. For further information on our group structure, 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.
- 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).

On average we advise more than 3000 clients across over 115,000 matters annually, our international and UK teams of lawyers and advisors are focussed on providing [services across six core Sectors](#):

- Financial Services
- Health and Social Care
- Insurance
- Real Estate
- Technology
- Industry

DAC Beachcroft is recognised in legal rankings for our work with clients across a range of industries and as market-leaders in the insurance, health and real estate sectors.

2. Our Supply Chain

As a legal services provider DAC Beachcroft predominantly employs qualified lawyers who are assisted by colleagues providing administrative, business services and facilities support.

Suppliers of goods and services, used to enable us to deliver our services are procured in accordance with our Procurement Policy, with most sourced from, and within, the UK. Where this is not possible, our policies and procedures require that appropriate consideration is given to identifying a suitable supplier who aligns with, and can deliver our requirements.

Most suppliers fall within the scope of:

- **Professional services** such as experts, Counsel, foreign lawyers, business advisors such as tax, and training providers.
- **Support services** such as cleaners, maintenance workers, caterers, security and IT support.
- **Vendors** of goods such as office supplies, venues and branded merchandise.
- **Technology** such as hardware, software including cloud, SAAS and telecommunications providers, and subscriptions.

Since our last statement there have been no substantial changes to our principle suppliers.

3. Our Policies and Procedures

As a law firm we have a zero-tolerance approach to modern slavery, forced or bonded labour, servitude or human trafficking ("modern slavery") within our business and our supply chains.

This is affirmed in our Anti-Slavery policy and reflected in our commitment to being a [Responsible Business](#), operating in a clear and transparent manner, as underpinned by our [Purpose, Vision and Cultural Principles](#). We have developed a cohesive and interconnected [Environmental Social & Governance \(ESG\) strategy](#) to help us deliver on our purpose and our commitments to colleagues, clients, suppliers, local communities and the environment.

Given the nature of our business, we believe our exposure to modern slavery risks is low. However we are committed to implementing, reviewing the effectiveness of, and enforcing systems and controls to ensure modern slavery is not taking place anywhere in our business or within our supply chain.

To ensure that we remain alive to combatting the risks of modern slavery, and engage with those aligned with this, we ensure that our systems and processes consider and mitigate such risks through:

Recruitment

- recruiting and developing colleagues based on business need, merit and competency.
- complying with all legal obligations when recruiting, including confirming right to work.
- undertaking due diligence of prospective employees, through a careful recruitment and interview process and candidate background checks (including employment references and verification of qualifications).

Continuing employment

- requiring colleagues to provide annual declarations in relation to key risk topics.
- maintaining policies and procedures which comply with all legal and regulatory requirements including those dealing with Equity, Diversity & Inclusion, Whistleblowing, Bullying & Harassment.
- introducing work focussed programs in line with our cultural principles, including [FlexForward](#) and [Reconnect](#).

- monitoring and discussing colleague performance, agreeing development plans and recognising and rewarding behaviours in line with our culture and strategy.
- maintaining core training requirements for all colleagues with tailored training dependent on role and business function.
- ensuring that none of our UK colleagues are paid less than the current UK National Living Wage.

Client relationships

- setting and maintaining a strategy aligned with our core objective to be the law firm of choice for our clients.
- prior to entering into business relationships with clients, undertaking due diligence in order to identify any potential legal, regulatory and/or reputational risks.
- agreeing competitive, pragmatic terms to ensure appropriate and mutually acceptable terms.
- monitoring, understanding and responding to client requirements.

Procurement

- maintaining a dedicated Procurement function.
- ensuring that we regularly review our Procurement Policy and strategy.
- supporting our Procurement function to act ethically by adopting the CIPS Corporate Code of Ethics.
- retaining a Corporate Ethical Procurement and Supply accreditation which 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.
- supporting the training and development of our Procurement colleagues to work towards, and where appropriate, hold CIPS qualifications.

Supplier Engagement

- ensuring that suppliers are identified and sourced in accordance with the Procurement Policy on a transparent and objective basis.
- requiring suppliers to confirm that they agree to our minimum standard terms aligned with our business policies and procedures.
- undertaking robust due diligence to ensure adequate and appropriate arrangements are in place and the suppliers can demonstrate their compliance with our requirements at the outset of, and during, our relationship with them.
- managing our relationships with suppliers through regular engagement.
- ensuring that clear, contractual arrangements are in place reflecting respective roles and responsibilities.

Office of the General Counsel

- maintaining a central team of lawyers, governance professionals and applicable subject matter experts to ensure that the business is aware of, and complies with, its legal and regulatory obligations.
- engaging with, and supporting, the business in delivering its strategic goals in accordance with agreed risk appetites.
- reviewing no less than annually, assessing and challenging the suitability of governance processes together with our policies and procedures to ensure continued alignment with relevant legislation.

4. Due Diligence

Prior to, and during, our relationship with suppliers they are subject to appropriate and proportionate due diligence.

This ensures that those we do business with satisfy legal and regulatory requirements and align with our Cultural Principles and Purpose.

At the outset of our relationship, suppliers are required to agree our minimum commercial terms and specifically:

- warrant that that no slavery is used in their business or supply chain with processes and policies in place to safeguard against such risk.
- agree indemnity provisions and rights to terminate for breach of our anti-slavery requirements.

In addition they must adhere to our supplier operating principles, which include:

- management systems to deliver and monitor contractual compliance reflecting agreements with DAC Beachcroft and their supply chain.
- compliance with all relevant legislation and [ILO](#) conventions.
- systems and processes to communicate their compliance expectations to all of their relevant employees and sub-contractors/supply chain.
- comply with Environmental, Social and Governance requirements and co-operate with our reasonable requests for additional information.

Due diligence responses, and confirmation that our requirements will be complied with, are reflected in our written terms with suppliers. These terms include the ability to terminate the agreement for non-compliance with our requirements.

To ensure that suppliers continue to comply with their obligations they are subject to regular relationship management activities together with periodic revalidation. The scope and frequency of such activities is dependent on the nature and extent of the services being provided.

Any instance of non-compliance identified is escalated and addressed promptly by Procurement working with members of our Office of the General Counsel.

5. Risk Assessment and Management

As a business we remain alive to the direct and indirect risks arising from modern slavery.

Whilst we view the risk as low and believe we have adequate controls in place to manage, monitor and mitigate such risks, [modern slavery can occur in many different ways](#) and [case law continues to identify emerging areas of potential risk](#).

Our business-wide risk assessment reflects the policies, controls and procedures we have in place to mitigate modern slavery risks. This is reviewed and updated annually or more frequently in the

event of a significant structural change, the introduction of a significant new work stream, the opening of an office in a new jurisdiction, a change to the legal framework or any other major change that could influence the risk to our business.

To ensure continual consideration of modern slavery risks across all areas of our business we:

- set and direct our approach to modern slavery at Board level, delegating responsibility to the Senior Partner who is supported by the Office of the General Counsel.
- periodically remind all colleagues of their obligations in relation to modern slavery.
- ensure that applicable colleagues undertake required training (no less than annually).
- review and maintain applicable policies and procedures to identify areas of potential legal or regulatory risk with escalation processes clearly outlined.
- support visibility of new and emerging risks via horizon scanning.
- actively monitor and respond to our commitments to avoiding instances of modern slavery within our supply chain by:
 - using heat/risk mapping to document and monitor risks, ensuring these are reflected in future contract renewals.
 - actively monitoring and engaging with suppliers (by risk categorisation of critical, key or operational) during the lifecycle of the business relationship.
 - considering local legislation and sensitivities prior to procuring services for our international offices.
- collaborate between the Office of the General Counsel, Procurement, HR and Responsible Business functions to ensure expectations are clearly set and managed.

6. Training and Awareness

Ensuring that our colleagues understand what modern slavery is, are able to identify associated red flags and are aware of what to do if any concerns are identified, are critical to managing modern slavery risk.

In accordance with National Crime Agency guidance, the training is mandatory for members of our Employment and Real Estate legal teams. Colleagues in our HR, Finance, Procurement and Office of the General Counsel functions also receive training.

The scope and content of the training is subject to periodic review to ensure it reflects current legal and business requirements. Completion rates are actively monitored to ensure completion and compliance.

Awareness of our wider policy and process framework forms part of our induction programme, with key modules required to be undertaken at specified intervals. Whilst our modern slavery and human trafficking e-learning module is not mandatory for all colleagues it can be accessed and completed at any time to support wider awareness and continuing professional competency.

Awareness is further supported through business-wide communications, which:

- highlight our policies and procedures.
- remind colleagues of our zero-tolerance approach to modern slavery and human trafficking.
- identify and signpost to applicable due diligence requirements.

7. Key Performance Indicators

Over the last 12 months:

- no instances, or concerns, of modern slavery have been identified within our business or supply chain.
- members of the Office of the General Counsel, Procurement and Responsible Business teams have met to discuss actions underway in their respective areas in relation to modern slavery risks.
- we have continued to focus on steps to mitigate the risk of modern slavery within our supply chain by ensuring that:
 - our Procurement colleagues have successfully completed their modern slavery training and achieved or maintained applicable CIPS certifications.
 - new suppliers provide adequate and appropriate due diligence responses which are subject to periodic review and revalidation.
 - our vendor risk management tool is utilised and operating effectively, identifying and implementing improvements where required.
 - relationships are effectively managed, services delivered in compliance with applicable laws and onerous or unnecessary requirements avoided.
- focus has continued on the tone and content of training available to colleagues to ensure awareness and insight into modern slavery risks.
- commenced a review and refresh of our modern slavery training to ensure it remains relevant, appropriate and fit for purpose.
- reviewed our approach to our modern slavery statement, its content and actions arising from our modern slavery statement commitments.

Within the next year, we are committed to:

- implementing our updated modern slavery training and encouraging completion by colleagues beyond the mandatory groups.
- undertaking a review of the alignment of our modern slavery process(es) with our Responsible Business strategy to ensure that they continue to align and effectively support the fight against modern slavery. Such actions will include:
 - consideration of if we become formal signatories to the UN Global Compact.
 - if an ethics committee/steering group should be formed to inform our Responsible Business and wider strategies.
 - deciding if we should produce and provide modern slavery specific toolkits to better inform colleagues of the underlying risks.
- review the scope and use of our vendor risk management tool to determine:
 - if it continues to meet our business requirements.
 - what alternative options are available.
 - how we can best use the vendor risk management tool to manage risks within our supply chain.
- monitoring the effectiveness of our systems, policies and processes to ensure that the risk of modern slavery within our business and supply chain remains low.
- agreeing and enforcing appropriate accountability and governance mechanisms to support our continued efforts to manage modern slavery risks through both Responsible Business and Procurement activities.

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

[Slavery and Human Trafficking Statement – October 2021](#)

[Slavery and Human Trafficking Statement – October 2022](#)

[Slavery and Human Trafficking Statement – October 2023](#)

Approvals

This statement was approved by the DAC Beachcroft LLP Group Board on 26 September 2024 and signed by our Designated Member and Senior Partner.



Virginia Clegg
Designated Member
DAC Beachcroft LLP
9 October 2024