

Slavery and Human Trafficking Statement October 2020

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

- [Slavery and Human Trafficking Statement – October 2016](#)
- [Slavery and Human Trafficking Statement – October 2017](#)
- [Slavery and Human Trafficking Statement – October 2018](#)
- [Slavery and Human Trafficking Statement - October 2019](#)

DAC Beachcroft is a leading international legal 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 industry sectors and are market-leaders in the insurance, health and real estate industries. For more information about the services we offer, 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 larger group structure, please click [here](#).

Our Approach

As a group we comply with all laws, rules and regulations relevant to our business, in all countries where we operate. 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 own business or in any of our supply chains.

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 within which our offices are based. For information about our Responsible Business Strategy, please click [here](#).

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. Relevant policies 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. This policy makes colleagues aware of their responsibility to report any suspected slavery incidents and confirms how they should do this (via our Whistleblowing policy, or alternatively via our 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

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Wage Employer and none of our colleagues are paid less than the current UK National Living Wage.

Our Practice Governance & Risk Group works in conjunction with both our HR and Procurement function 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 Consulting Services, Site Services and Maintenance, and Travel and Conferencing. Each of these categories support the business operations for our Firm 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 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 their entire supply chain; and
- has systems in place to ensure compliance with the Modern Slavery Act 2015.

All suppliers (including their sub-contractors/supply chain) are also 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.

The responses to our due diligence questionnaire allow us to assess the risk of modern slavery and human trafficking in the supplier's business and their supply chains, 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.

The steps we have taken to date to help mitigate the risk of slavery and human trafficking in our supply chain include:

- Obtaining contractual warranties that no slavery is used anywhere in the supplier's business or by any of the suppliers in 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;
- Obtaining a contractual right to request compliance-related information from suppliers as well as a contractual right to audit suppliers at our discretion. Our internal supplier audit programme is being developed and will include an assessment of compliance with our Supplier Operating Principles; 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

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

Our clients

As a group, we are required by applicable legislation and regulations to identify our client and the nature of their instructions. Building up a client profile by carrying out thorough client due diligence allows us to identify any specific risks related to our clients and helps us to ensure that we do not act for clients in circumstances where it is illegal or inappropriate to do so. All staff are required to report any breaches of our policies, law or regulation to our Practice Governance & Risk Team.

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. During 2019/20 we developed a new modern slavery and human trafficking e-learning module ensuring the training provided to staff continues to be relevant and interactive. This year we are updating our training further, referencing learnings taken from the recent National Crime Agency guidance for the legal sector.

It is compulsory for those who need to be the most vigilant to ensure that slavery or human trafficking are not taking place within our organisation or our supply chain including the Practice Governance & Risk group, HR and Procurement functions.

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

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.

Approvals

This statement was approved by members of the DAC Beachcroft LLP Group Board on 29 September 2020 and signed by our Designated Member and Senior Partner.



Virginia Clegg
Designated Member
DAC Beachcroft LLP
2 October 2020