

Anti-slavery and human trafficking policy and statement

Womble Bond Dickinson (UK) LLP and Womble Bond Dickinson Wealth Limited (together referred to as “we”, “us” or” our”) are committed to acting ethically and with integrity in all our business relationships and take a zero tolerance approach to slavery and human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which deprive a person’s liberty and exploit them for personal or commercial gain.

We comply with the Modern Slavery Act 2015 (MSA) and expect our suppliers, and their supply chains, to take all reasonable and practical steps to comply with the MSA. We also expect our suppliers, and their supply chains, to engage in good employment practices and to comply with all relevant legislation and regulations in the countries in which they operate.

Our business structure

Womble Bond Dickinson (UK) LLP is a leading UK law firm providing a comprehensive legal service across a wide range of business sectors from our offices in the UK.

Womble Bond Dickinson Wealth Limited is a wholly owned subsidiary of Womble Bond Dickinson LLP, providing regulated financial advice and services from our offices in the UK.

Womble Bond Dickinson (UK) LLP is a member of Womble Bond Dickinson (International) Limited, an international network of firms. Each member operates as a separate legal entity. This policy and statement relates solely to Womble Bond Dickinson (UK) LLP, its structure and supply chain.

We do not have intricate supply

chains. Our suppliers are primarily providers of goods, services or works to support day to day management of our offices and operations (Operational Procurement), and providers of services on behalf of clients, for example expert witnesses or counsel (Legal Service Providers).

Our policies and procedures

We use these policies and procedures to help monitor and reduce the risk of modern slavery occurring within our business or our supply chains:

- this Anti-slavery Policy and Statement;
- Procurement Policy;
- responsible business policies and procedures; and
- Reporting Breaches and Whistleblowing Policy and Procedure.

Steps for the prevention of modern slavery

Operational Procurement

In our efforts to monitor and reduce the risk of modern slavery occurring within our business and its supply chains, we have carried out:

- a firm risk assessment to determine the level of risk of modern slavery posed to our business; and
- a supplier risk assessment to identify if any parts of our business or our suppliers are at risk of modern slavery so that efforts can be focused on those areas.

For those Operational Procurement suppliers with an annual spend of over £25,000 (a reduction from £50,000 last year and £100,000 in the preceding year), we have mapped the suppliers according to location, size,

reputation and industry. This mapping shows that:

- all our major suppliers are located within the UK, US or other low risk countries;
- all our major suppliers based in the UK which meet the financial threshold have published MSA transparency statements;
- all our major suppliers based in the US have published Supplier Code of Conducts which cover working conditions within their supply chains; and
- the vast majority of suppliers are within low risk industries.

In light of these assessments we have concluded that the risk of modern slavery occurring within our business and its supply chains is low.

Legal Services Providers

We have procedures in place governing how we procure services for clients. We expect high standards of integrity and professionalism from our service providers, and expect them to comply with all applicable statutory requirements, and share our commitment to ethical considerations.

Employment practices

We adopt robust recruitment processes. All our employees have the necessary documentation to legally work in the UK, are paid at least the Minimum Living Wage, and have reached school leaving age.

Further Actions

Our Procurement Policy is designed to ensure that we engage a supply base who also align to our ethical standards.

Our major suppliers are required to meet our minimum supplier standards; this includes confirmation that they will address the issue of modern slavery within their business and supply chains in accordance with the MSA and engage in good employment practices. Where our operational

suppliers are not legally required to produce and publish a MSA transparency statement, we ask them to tell us if they do so voluntarily, and to share their statement with us.

Over the next 12 months, we will be carrying out a more in-depth review of the steps being taken to ensure that modern slavery does not exist within their supply chains by asking questions of our suppliers who are currently not required to produce and publish a MSA transparency statement. The suppliers selected for the review will include those with a substantial turnover approaching the MSA threshold and who have not produced a voluntary transparency statement and some smaller suppliers in certain sectors that we consider merit further review.

We will also be preparing to comply with the changes to the current transparency requirements under the MSA to which the Government committed in their recent response¹ to the “Transparency in supply chains” consultation published in 2019.

We will assess any instances of non-compliance with our minimum supplier standards on a case-by-case basis and will tailor remedial action appropriately. This remedial action may result in us deciding not to establish a relationship with a new supplier or the termination of our relationship with an existing supplier.

Training, responsibility for and compliance with this policy

Support teams involved in procurement have been trained to enable them to identify the risks of modern slavery and to report concerns. Training has also been provided to legal teams who might come across modern slavery in client supply chains.

We use our induction programme for new staff and annual refresher information for existing staff to raise and maintain awareness of the risks

of modern slavery in our business and supply chains and the importance of reporting any concerns.

The Board of Womble Bond Dickinson (UK) LLP has overall responsibility for ensuring that this policy complies with our legal and ethical obligations. Our General Counsel has day to day responsibility for implementing and monitoring the effectiveness of this policy and will review it annually.

We encourage all staff working for and with us (including employees, consultants, contractors and agency workers) to report any concerns about modern slavery in any part of our business or in our supply chains in accordance with our Reporting Breaches and Whistleblowing Policy and Procedure.

This policy does not form part of any employee’s contract of employment so may be amended from time to time.

Statement

This policy sets out the steps which we have taken and are continuing to take to ensure that slavery and human trafficking is not taking place in any part of our UK business or supply chains. This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Womble Bond Dickinson (UK) LLP (and its wholly owned subsidiary, Womble Bond Dickinson Wealth Limited) for the financial year ending 30 April 2020.

This policy and statement was approved by the Board of Womble Bond Dickinson LLP on behalf of its members on 7 October 2020. A copy of this statement was signed by Jonathan Blair, Managing Partner, on behalf of the Board and published on our website at www.womblebonddickinson.com/modern-slavery

¹ [Government response to transparency in supply chains consultation 21 09 20](https://www.gov.uk/government/consultations/transparency-in-supply-chains)

This policy and statement was signed by:



Jonathan Blair Managing Partner

