



Modern Slavery and Human Trafficking Statement 2025/2026

Dentons UK and Middle East LLP and all group companies

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 on behalf of Dentons UK and Middle East LLP (the Firm) and all group companies including but not limited to Dentons UK and Middle East Legal Services (the Group, or 'we'). The Firm is the controlling party within the Group. The statement sets out the steps the Group has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. The Firm's financial year end is 30 April and this constitutes our slavery and human trafficking statement for the 2025/2026 financial year.

1. CEO Statement

We recognise the suffering caused by modern slavery and human trafficking. In today's global marketplace, we recognise that all businesses have a responsibility to understand whether modern slavery and human trafficking is taking place within their supply chains and this is a responsibility we take seriously.

2. Our Organisation and Supply Chain Structure

Corporate Structure

The Firm is an English limited liability partnership with registration number OC322045. We provide legal services across the UK, Ireland and the Middle East (our 'Region'). We have four offices in the UK, located in London, Milton Keynes, Edinburgh and Glasgow. We provide a full range of legal services to clients from many sectors, including telecommunications, energy, real estate, financial services and retail. For the 2025/2026 financial year, our turnover was in excess of £36 million.

Dentons UK and Middle East Legal Services is an English private unlimited company with registration number 2746217. The company is based in London although operates throughout all the Firm's offices in the UK. The principal activity of the company is to provide staff services to the Firm.

We are a member of Dentons, a global legal practice providing client services worldwide through its member firms and affiliates. We do not have an overall parent company.

Our Supply Chain

As a law firm, we always work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. Corporate social responsibility is an intrinsic part of our culture, and we aim to make a lasting and positive impact on the communities in which we live and work. We expect the same from our suppliers and business partners.

Our supply chains include leases for the properties we occupy, catering services, office and facilities management services, recruitment and employment agencies, consultancy and professional services companies and the purchase of goods such as office furniture, supplies, and IT equipment and software. We have long-term partnerships with many of our suppliers across our offices. Most of our suppliers are based in the UK, US, EU and Canada. All suppliers are assessed as part of our procurement process, they are required to sign a certificate to confirm they will comply with the Firm's

policies (including the Anti-Slavery Policy detailed below) and complete a compliance questionnaire, which includes questions on modern slavery when the risk of exploitation of workers is heightened (for example, for catering or cleaning services). The Group is committed to ensuring we are not supplied by anyone who engages in human trafficking and modern slavery.

Recruitment Practices

We ensure compliance with all applicable laws during recruitment and onboarding, for example we ensure all workers have the right to work in the country they are working, this includes carrying out background searches, likeness checks against ID documents and using the Home Office search function for those employed in the UK.

All employees we recruit go through an interview process and appropriate background screening, which includes obtaining employment references. Relevant background checks are carried out according to local legal and regulatory requirements. Recruitment decisions are based on merit and capability, and recruitment is always carried out in accordance with our Diversity and Inclusion and Equal Opportunities policies.

We recruit employees and partners directly via referrals, job boards, direct approaches and inbound enquiries. We also use recruitment agencies for the recruitment of employees and temporary workers. We ensure all employees have the legal right to work in their respective jurisdictions, and we do not use brokers or labour market intermediaries.

3. Our Policies on Slavery and Human Trafficking

The Firm has a suite of policies and procedures which aim to mitigate the risk of slavery or human trafficking occurring in the Firm's business or supply chain. The policies listed below are reviewed on a regular basis, are available on the Firm intranet site and any changes to these policies are communicated through internal Firm-wide emails or alerts on our intranet site. The following Firm policies are directly relevant to slavery and human trafficking:

- **Our Anti-Slavery Policy** ([linked here](#)) applies to everyone working for us and on our behalf in any capacity. The Anti-Slavery Policy has been approved by the Firm's management, and a team led by our General Counsel, working closely with our Operations, Procurement, Information Security and Compliance functions implements the Policy. We explicitly mention in the policy that everyone working for the Firm is responsible for preventing, detecting and reporting modern slavery if it is encountered.
- **Our Speak Up Listen Up Policy (including Whistleblowing)** is published on our internal intranet site and included within our Employee Code of Conduct. This policy encourages everyone at the firm to report any wrongdoing or breaches of law or Firm policies, and concerns can be raised in confidence without fear of disciplinary action. We also provide access to a confidential external reporting service, which is managed by an independent third party and allows anonymous reporting. We have taken steps this past year to increase awareness of the

Speak Up reporting mechanisms available for employees and partners in our Region by adding posters in our UK office kitchens, including detail of the policy in regionwide newsletters and updates, providing officewide reminders ahead of our office parties and promoting the policy on laptop screensavers across the Region.

- **Our Procurement Policy** is published on our internal intranet site and applies to all purchases or procurement of goods and services made by, or for the benefit of, the Firm, and provides detail of the Firm Vendor Risk Assessment which includes modern slavery and corruption questions and is used to assess the level of risk posed by the potential supplier before they are engaged by the Firm. Risks associated with our suppliers are actively monitored throughout the supplier lifecycle via our Third-Party Risk Management and Continuous Monitoring Process, which is explained in further detail in section 4 below.
- **The Supplier Code of Ethical Business Practices** applies to all suppliers the Firm engages. It is issued to suppliers during the onboarding process, and we require all suppliers to sign a certificate confirming they will comply with the terms of this Code and our Anti-Bribery and Corruption Policy and Principles. The Code sets out the standards we expect our suppliers to uphold relating to various matters, including human rights, forced and child labour, equal opportunities and non-discrimination, and requires compliance with anti-slavery and human trafficking laws and regulations. We expect our suppliers to uphold these principles in their own supply chains and to work with their own vendors, subcontractors and suppliers to ensure these principles are followed.
- **Our Anti-Bribery and Corruption Policy** states that *"we do not tolerate bribery or corruption in any form"*. The policy extends to all our dealings in all countries in which we work. We require all of our partners, staff and third parties with whom we do business (including suppliers) to comply with this policy. As mentioned above, we require suppliers to sign a certificate confirming they will comply with this policy.
- **The Dentons Global Code of Ethics and Conduct** places an obligation and responsibility on all Dentons employees and partners globally to conduct all business legally and ethically and to report any concerns of misconduct.
- **Our Equal Opportunities Policy** sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.
- **Our Employee Code of Conduct** applies to everyone working for the Firm and aims to ensure that the Firm's values are demonstrated by our employees' conduct and behaviours, including requirements to act with integrity and respect in dealings with colleagues and third parties.

4. Assessing and Managing Risk

Our working practices respect and uphold human rights for our partners, employees, and contractors. We take the following steps to identify risks of modern slavery and human trafficking within our business and our supply chain:

- We assess risks related to human trafficking and forced labour associated with our supply chain. We have implemented an automated assessment for all suppliers as part of the onboarding process, this includes a statement to confirm that we have the right to audit any suppliers for any concerns or red flags of modern slavery. We use a risk matrix to help us understand and assess the risk level of potential suppliers.
- We carry out due diligence on all relevant and appropriate suppliers by asking for information on their policies on fair sourcing of goods and services and employment practices. In respect of certain suppliers, we seek the right to request and receive copies of their policies.
- We carry out enhanced due diligence when a supplier is identified as high-risk of modern slavery or human trafficking, further details of the enhanced due diligence are included in section 5 below.
- We impose contractual terms on relevant and appropriate suppliers asking them to ensure that they and their suppliers are in full compliance with our Anti-Slavery Policy and Code of Ethical Business Practices. We will seek to audit our suppliers where there is deemed to be considerable risk, or we have concerns about non-compliance, to ensure that this is followed.
- When signing and agreeing to our Supplier Code of Ethical Business Practices, all suppliers agree to (i) comply with our relevant policies; (ii) appoint a senior member of the business to promote compliance with our Code; (iii) set up a monitoring process to verify that the standards in our Code are being met and continually reviewed and improved to ensure compliance, with a process for corrective actions to be set up and followed through; (iv) notify the Firm if they are not currently complying with any of the requirements of the Code and present a business plan to ensure such compliance is achieved within a reasonable period of time; (v) ensure that their workforce (including those not directly employed e.g. agency staff, contractors and subcontractors) is aware of our Code and provide them with the appropriate training to comply with the Code; and (vi) where appropriate, seek to obtain from their own suppliers a commitment to comply with the Code.
- We use an automated vendor management system. This stores all vendor documentation and their responses to our Due Diligence Questionnaire. As part of the onboarding process, suppliers must confirm if they have a Code of Conduct for their own supply chain prohibiting child labour and modern slavery, and we ask whether they have a right to audit their own suppliers. We also ask for details and evidence of further measures they have implemented to eliminate modern slavery in their supply chain. If we identify any red flags in their responses, we will not onboard the supplier.

- We have recently introduced a Third-Party Risk Management and Continuing Monitoring process within our automated vendor management system. This enables the Firm to identify, assess and manage risks associated with external suppliers, including risks relating to modern slavery. Suppliers are categorised into risk tiers based on factors including business criticality and the volume and sensitivity of the data they handle. Suppliers assessed as presenting a higher level of risk are subject to a more detailed assessment, involving relevant internal specialists from functions including Information Security, Data Protection, Health & Safety, ESG and Legal. Risk assessments for active suppliers are repeated periodically, with the frequency determined by the supplier's assigned risk tier. The Continuous Monitoring module within our vendor management system automatically screens our supplier base against global watchlists and notifies us of any adverse findings, using risk intelligence supplied by a leading global data provider. This ongoing monitoring enables us to identify potential modern slavery risks or concerns requiring review at an early stage of the supplier lifecycle.
- Specific risks relating to modern slavery in our supply chain have been added to the Firm's Legal and Procurement Risk Registers to ensure these risks are reviewed by senior management for senior level oversight of the modern slavery risk in the Firm's business and supply chain.

5. Due Diligence in Relation to Modern Slavery

We conduct a due diligence assessment of all suppliers through several Questionnaires in the following areas:

- ESG and Conflicts Check
- Financial and Reputational (including external risk signals, such as sanctions, Politically Exposed Persons (PEP) exposure and adverse media)
- Information Security
- Business Continuity
- Data Privacy
- Contract Performance Capability
- Intellectual property
- Legal Compliance and Contract Review
- Health and Safety (when applicable)

If we identify a supplier as high-risk in relation to slavery or human trafficking, which can be due to the supplier's business sector, overseas production, product type, use of third-party supplier or geographical risks, we conduct enhanced due diligence during the onboarding risk assessment. This includes asking the following additional questions:

- Is the industry labour-intensive? (e.g. Construction, cleaning)
- Does the product have a short life-cycle due to changing seasons (e.g. fresh produce) or consumer demands (e.g. mobile phones)?

- Is the service undervalued in our society?
- Are any raw materials being used high-risk for modern slavery? (e.g. cotton, agriculture products) If so, where are they sourced?
- Are the products sourced from countries with any of the following:
 - Poor governance structures and a weak rule of law
 - Inadequate labour protection
 - Corruption or instability
- Do you supply goods and/or services directly or do you work with third party suppliers?
- Are you likely to use sub-contracting or labour-hire firms or otherwise outsource work?
- Do you have tight delivery timeframes that may place unreasonable pressure on suppliers?
- Are any services provided using contract workers?
- Are you aware of low-skilled migrant workers working in your organisation's supply chains?
- Are any workers forced to work "on call" (day or night)?

We also ask questions about the ownership and control of the supplier and will also assess their supply chain, if deemed necessary and relevant.

6. Training

Modern slavery and human trafficking training is mandatory for all staff as part of the Firm's induction training. We have a Firm-wide programme of refresher training for all staff within our Region to educate and remind them of their obligations under the Modern Slavery Act 2015, this was delivered in 2023, and we will keep under review when it is necessary to roll out further refresher training. The training raises awareness of the relevant legislation, includes examples of modern slavery in the UK, explains the different forms that modern slavery can take and how our staff members can help to identify risks of modern slavery when working with clients and suppliers, and take steps to prevent and eradicate such risks. The refresher training acts as an on-going reminder of the importance of our obligations in tackling modern slavery.

Our Office of the General Counsel team also provides regular Firm training on workplace culture and behaviours, which includes details on the 'speaking up' reporting mechanisms available to all staff at the Firm. We include reference to the Speak Up policy and reporting mechanisms available to employees and partners in all relevant training delivered across the Firm. Training requirements on modern slavery for staff members working in human resources and procurement are also kept under regular review.

7. Monitoring and Evaluation

Supplier Monitoring

The Firm does not engage suppliers identified as high risk in any one of the assessed areas, or suppliers who fail to pass the risk assessment. We take our responsibilities seriously in the markets and communities in which we operate and strive to ensure that our dealings with our suppliers are free from corruption and unfairness.

Our Procurement Policy encourages reporting of any reasonable suspicions or breaches of the Firm's Supplier Code of Ethical Business Practices or illegal activity of any suppliers to the Dentons UKIME Procurement Manager.

We use an AI-enabled automated procurement system, which provides an interactive platform for our Procurement Team to oversee and actively monitor the procurement process, including supplier policies and documents. This system alerts the Procurement Team when any supplier policy or document has expired or is outdated. We have also implemented the Third-Party Risk Management process within the procurement system, as detailed above. This automatically triggers a risk assessment when suppliers are onboarded, and notifies the Procurement Team when reassessments are due. In addition, the system's Continuous Monitoring module alerts the Procurement Team to new risk intelligence relating to our suppliers. Where potential risks are identified, these alerts prompt further investigation and, where appropriate, remedial or other risk-management action. Together, these processes support the Firm's ongoing identification, assessment and management of supplier risks, including those related to modern slavery.

Reporting Concerns

The Firm aims to promote an open and collaborative culture in which people feel comfortable reporting any concerns of non-compliance. We actively encourage and provide regular training on 'speaking up' and anyone within the Firm can report concerns to supervisors, partners, heads of department, the Office of the General Counsel and HR teams. We also provide access to an external confidential whistleblowing service, as detailed above in section 3. Any disclosures related to modern slavery can be made using any of our whistleblowing mechanisms, and we assure staff that no action will be taken against anyone who makes a disclosure in good faith, regardless of the outcome of any investigation.

Continuous Improvement

Over the next financial year, the Firm will ensure we continue to make progress in identifying, preventing and responding to modern slavery risks by:

- Continuing to raise awareness of modern slavery risks across all levels of the Firm.
- Delivering targeted training to teams who have more exposure to modern slavery issues.
- The Office of the General Counsel will continue to include reminders on the Speak Up policy and reporting mechanisms in all relevant training delivered across the Firm.
- Continuing to assess, develop and improve our supplier procurement and due diligence processes.
- Continuing to review the modern slavery risks in the Firm and our supply chain through review of the Firm's legal and procurement risk registers on a regular basis.
- On our procurement system, we will periodically generate summary reports to provide us with a consolidated view of our supplier risk landscape. This will identify high-risk suppliers (including those with identified anti-slavery risks), business critical suppliers, key risks identified across different assessment areas, and the status of any required mitigation

actions to ensure that we are continuously monitoring our supply chain and any associated risks of modern slavery.

Approval

This statement has been approved for and on behalf of the members of Dentons UK and Middle East LLP and by the Board of Directors of Dentons UK and Middle East Legal Services on 14 October 2026.

I declare that, to the best of my knowledge and belief, the information contained in this statement is accurate.



Paul Jarvis

UKIME Chief Executive Officer of Dentons UK and Middle East LLP

Authorised Representative of Dentons UK and Middle East Legal Services