

Modern Slavery and Human Trafficking Statement: 2021-2022



Introduction from Senior Partner and Chair

Linklaters is committed to ensuring that modern slavery, human trafficking and, indeed, any abuse of human rights have no place in our organisation or in our supply chain. I am pleased that we are reinforcing that commitment through this statement.

Responsibility is at the heart of how we operate as a leading global law firm. We address and champion human rights extensively through our advice to our clients and our pro bono programme. We also have an equivalent commitment to running our own operations to the highest standards. Our values – which include mutual respect, acting with integrity and considering ourselves a single, inclusive team – underpin these commitments.

This is our seventh modern slavery statement. However, we recognise it is imperative to remain vigilant to modern slavery risks and challenge ourselves to apply greater rigour and accountability to our approach to addressing those risks. We are pleased to report on the renewed emphasis we have placed on responsible sourcing in particular this year, including the implementation of a new platform which allows us to capture and act on concrete supplier performance data. We are committed to further strengthening the systems and initiatives we have in place to prevent modern slavery from occurring within our business and our supply chain and to ensure that these processes have a real and measurable positive impact. Through our [annual reporting to the UN Global Compact](#) and this statement, we ensure that we are transparent on these commitments and that we hold ourselves to account on our year-on-year progress in combatting modern slavery in all its forms.



A handwritten signature in black ink, reading 'Aedamar Comiskey'. The signature is fluid and cursive, with a large, stylized 'A' and 'C'.

Aedamar Comiskey, Senior Partner and Chair, Linklaters LLP



1. Background to this statement

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 (the “**Act**”). It sets out the steps taken during our last financial year (1 May 2021 – 30 April 2022) to ensure that slavery and human trafficking is not taking place in any of our supply chains or in our own business. It is published on behalf of Linklaters LLP and its wholly owned subsidiary, Linklaters Business Services (“**LBS**”), and references to “we”, “us”, “our”, “Linklaters” or “the firm” are to both.

This statement has been approved by the firm’s Corporate Responsibility Committee (a delegated sub-committee of our Partnership Board) and signed by our Senior Partner and Chair and Firmwide Managing Partner.

Our previous Modern Slavery and Human Trafficking Statements can be viewed [here](#).

The Act defines modern slavery as “slavery, servitude, and forced or compulsory labour” as well as “human trafficking”, which are collectively referred to as “**Modern Slavery**” in this statement.



2. Our structure and supply chains

Linklaters is an integrated global law firm, established and operating as a limited liability partnership under English law with branches and related local entities across the world. Our lawyers advise on multi-jurisdictional projects and transactions from 30 offices in 20 countries. The firm is owned by our partners, with a global management team who ensure that all our offices, and practices work together effectively to achieve our goals.

As a firm we engage suppliers for a wide range of goods and services. Our largest supplier categories, typically accounting for over 70% of our total influenceable supplier spend, include Facilities (including catering, cleaning security and maintenance), Human Resources (including recruitment and training) and Technology (including the provision of equipment to our people and systems/software for our operations). We segment our supply base and deploy a supplier relationship management framework across our top-tier suppliers to foster greater transparency and collaboration. The firm’s relationship with its suppliers across our global network is overseen by a dedicated Strategic Sourcing and Supplier Management team.



3. Our policies

Linklaters is a signatory to the United Nations Global Compact (“**UNGC**”) and responds annually on our progress against the UNGC ten principles. Principle one is “the protection of internationally proclaimed human rights”, and principle four is “the elimination of all forms of forced and compulsory labour”. Our [statement of intent on human rights](#) also makes explicit our commitment and clarifies our ambition. The statement endorses the United Nations Guiding Principles on Business and Human Rights and supports the principles contained within the International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

We are committed to championing these principles, and one of the key ways in which we do so is by channelling the legal skills and expertise of our people to those organisations and individuals in need of help. Last year we continued work on the first phase of a multi-year and multi-region project for Hagar International, an NGO working to support those who have escaped human trafficking.

Our collaboration has seen lawyers from seven jurisdictions partner with Microsoft’s in-house team to review domestic cybersex trafficking legislation, as Hagar fights the recent alarming rise in cybersex trafficking of young people globally. Our senior litigation lawyers also trained prosecutors and judges in Liberia as part of courses offered by our long-term partner Lawyers Without Borders on forced labour and human trafficking. In the United States we continued to act for individual survivors of trafficking through our partnership with Sanctuary for Families and provided governance support to a small New York-based organisation focused on championing the welfare of migrant workers.

Within the firm, our Modern Slavery Policy also sets out our commitment to advancing human rights principles and standards, upholding the rule of law and preventing human rights abuses, including Modern Slavery. It applies globally to all staff working for the firm including employees, consultants, agency staff and contractors. The Modern Slavery Policy directs to guidance about what constitutes Modern Slavery and potential indicators of Modern Slavery. It reminds all of our people of their responsibility to prevent, detect and report any concerns they may have in relation to Modern Slavery within our business or supply chain at the earliest possible stage, highlighting the practical steps that our staff can take if they are concerned about the existence of any such type of behaviour. Our Modern Slavery Policy sits alongside our [Ethical Code](#) – which sets out our global ethical standards and compliance responsibilities and how they are supported by our purpose, culture, values and behaviours – our global Regulatory Reporting Policy and our Global Whistleblowing Policy.

We partner with suppliers who share our strong and accountable commitments to respecting human rights. We expect our suppliers to operate fair and ethical workplaces, where workers are treated with dignity and respect, and the highest standards of human rights are upheld. Our Supplier Code of Conduct and our recently-refreshed Responsible Sourcing Policy, both of which we make publicly available on our [website](#), set out our approach to ensuring Modern Slavery is not tolerated in our supply chain. Both documents outline the basic ethical requirements to which our suppliers must adhere, including affording employees the freedom to choose employment and not using any form of Modern Slavery. We require our suppliers to comply with the principles contained in the Supplier Code of Conduct, as well as the specific obligations on Modern Slavery contained within our supplier contracts. Suppliers contracting with Linklaters are also expected to promote the principles of our Supplier Code of Conduct in their own supply chains.

As a firm we recognise the importance of continually improving our processes and ways of working to ensure that they are efficient and reflective of the latest industry thinking. In the next twelve months we will be further refining our approach to responsible sourcing. We will reaffirm our priority areas in relation to sustainability within our supply chain, including Modern Slavery. Our refreshed approach will focus on implementation of our recently-updated Responsible Sourcing Policy, Supplier Code of Conduct and internal responsible sourcing playbooks, aiming to ensure that responsible sourcing as an ethos is fully embedded into our end-to-end sourcing process, including how we contract, collaborate with and monitor our supply chain.



4. Risk Assessment and Due Diligence Processes

Within our business

As a professional services organisation which is regulated in the various jurisdictions in which we operate and which primarily employs lawyers and business professionals, we consider the overall risk of Modern Slavery existing within our own business to be low. We have an internal, cross-functional Modern Slavery working group that keeps this assessment and the related preventative measures detailed below under ongoing review.

We deploy a number of due diligence measures throughout our recruitment and employment processes in particular to ensure that we remain diligent and proactive in ensuring there is no Modern Slavery occurring within our business. We comply with all applicable employment legislation relating to employee terms and conditions, including pay, and we invest heavily in supporting the health and wellbeing of our staff. Within the UK, everyone who works in our offices – whether directly employed or not – earns at least the “Real Living Wage” set by the Living Wage Foundation, and we are proud to be Principal Partners of the Living Wage Foundation, encouraging others to adopt this important commitment to fair pay. We are now also supporting equivalent initiatives in Ireland, Hong Kong and the US. We are also signatories to the Fair Hiring Pledge, an initiative which aims to ensure the fair treatment of domestic workers in Hong Kong.

We foster a working environment where all voices are heard and encourage our people to feel empowered to call out any breaches of our policies (including any concerns related to Modern Slavery). As outlined in Section 3 above, as well as our internal Modern Slavery Policy we have a global Regulatory Reporting Policy and Whistleblowing Policy. The latter is supplemented by an external whistleblowing hotline known as “SpeakUp” run by an independent organisation. The firm also has a Global Grievance and Complaints process which provides a consistent approach to raising concerns within the firm (including in relation to the working environment).

No instances of Modern Slavery within our business were identified during our financial year ended 30 April 2022.

Our supply chain

We view the risk of Modern Slavery existing within our supply chain as being greater than within our own business. Accordingly, we have put in place a robust supplier governance model to address this risk and ensure Modern Slavery is not tolerated within our supply chain.

Linklaters takes a risk-based approach to assessing the likelihood of the existence of Modern Slavery within our supply chain. This assessment, which is based on a scoring methodology (the results of which are noted and monitored through our supplier risk register), features within our end-to-end sourcing cycle, from supplier pre-contract due diligence to the onboarding process and ongoing contract management. It includes factors such as origin of manufacture of goods, the nature of services being supplied and location from which such goods/services are provided. This enables us to categorise suppliers and identify potential high risk areas to assess in further detail for Modern Slavery. The standard form contractual terms and conditions that we put in place with suppliers forbid any form of forced, bonded or involuntary labour. Additionally, in instances where our assessment of the goods/services provided implies an increased risk of Modern Slavery, we issue the relevant supplier with our Modern Slavery questionnaire to understand in more detail the degree of risk and further potential mitigation / corrective actions required. Where corrective actions are identified as being required, we work with the supplier to implement those within an agreed timeframe; failure by a supplier to do so would ultimately result in termination of the relationship (as further outlined below).

This year we recruited our first dedicated Responsible Sourcing Consultant whose role is to further develop this risk-based approach to responsible sourcing, including refinement of our due diligence processes and implementation of key performance indicators.

We also recognise the important role data plays in achieving transparent and ethical supply chains. This year another important milestone – fulfilling the commitment made in our last Modern Slavery statement – was our entry into a partnership with EcoVadis, a sustainability ratings platform, to provide us with greater transparency of the sustainability progress and gaps within our supply chain (including risks associated with Modern Slavery). During our financial year ended 30 April 2022, we focused on mobilising the EcoVadis platform and building a robust framework to assess (and act on, where appropriate) supplier scorecards. Where the EcoVadis scorecard on a particular supplier suggests an area of poor performance or of general concern, we use our own risk registers and supplier questionnaires to conduct a further deep-dive review on the supplier in question. Our intention is to ultimately set a minimum threshold for supplier Labour and Human Rights scores on the EcoVadis ratings platform. Through the EcoVadis platform we are also able to review key supplier policies, actions and results in directly relevant areas such as working conditions, child labour, forced labour, human trafficking, and supplier social practices. In addition we use the platform’s media monitoring functionality to keep up-to-date with all supplier news relating to human rights. We strive to embed a pro-active and collaborative approach to managing the threat of Modern Slavery throughout our global supply chain and our ongoing investment in tools and technologies such as the EcoVadis platform enables us to be more efficient and rigorous in our approach.

In the event that we become aware of a case of Modern Slavery actually occurring within our supply chain, we will work with the supplier to implement remedial actions. In all cases, consideration will be given to the approach that produces the safest outcome for potential victims of Modern Slavery. We expect our suppliers to engage with us constructively and responsibly and to demonstrate their willingness to remedy issues in a timely manner, and this is made clear in our Supplier Code of Conduct. Linklaters reserves the right to refuse to partner with, and ultimately to terminate any existing relationship with, suppliers that do not achieve or are unable to demonstrate progress towards the eradication of Modern Slavery within their organisations and supply chains.

This year we also remained alive to the challenges raised by the Covid-19 pandemic, energy crisis and other macro-economic and geopolitical events, and the potential impact such challenges may have on the risk and prevalence of Modern Slavery in global supply chains. We have not identified any such direct impact within our own supply chain, and no instances of Modern Slavery within our supply chain were identified during our financial year ended 30 April 2022.



5. Measuring effectiveness

Measuring effectiveness to us means critically assessing whether the measures we deploy to counter Modern Slavery are having practical and positive impacts, and using this to inform our future planning. We do this both through external indicators such as our own Gold EcoVadis rating and by setting internal key performance indicators and targets for the year ahead (such as the roll-out of our Modern Slavery-specific internal training, as outlined in Section 6 below).

The EcoVadis platform and supplier scorecards also help us to measure our effectiveness in combatting Modern Slavery in our supply chain. The EcoVadis methodology is built up using indicators including policies, endorsements, reporting, certifications and media coverage. The indicators provide a range of datapoints that we as a firm use to track, influence and continuously improve our effectiveness in monitoring and eradicating Modern Slavery within our supply chain (and further, which we use to inform our approach within our own business and ensure we are setting a high standard). Our current set of labour and human rights datapoints¹ indicate that the proportion of our suppliers with the following relevant measures in place are as follows:

Suppliers with an active whistleblowing policy on Human Rights issues	82%
Suppliers reporting on labour and human rights issues	42%
Suppliers who audit or assess their supply chain on CSR issues	67%
Suppliers who are a UN Global Compact signatory	55%

We will continue to monitor, expand and act on this data on an ongoing basis to ensure continuing improvement of anti-Modern Slavery compliance measures being integrated within our supply chain.

¹ Based on EcoVadis scorecards.



6. Awareness raising, training and capacity building

Our **Ethical Code**, which sets out the global ethical standards we expect everyone working for Linklaters to meet, makes clear our commitment to our role in building a fairer society. It also provides clear guidance to everyone at Linklaters regarding the high standards of professional behaviour expected of them, including treating everyone within and outside the firm with respect and being uncompromising in our integrity. A copy of our Ethical Code is given to all new joiners to the firm. Risk training offered this year to different teams within the firm discussed the importance of adhering to our Ethical Code at all times.

All new joiners to the firm also receive induction training on their compliance responsibilities, which signposts them to our key policies including our Modern Slavery Policy, Regulatory Reporting Policy and Whistleblowing Policy.

This year an interactive, Modern Slavery-specific training session was delivered to our Supplier Management team. The training provided a refresher of the requirements of the Act and the firm's approach and processes for countering the risk of Modern Slavery.

We have a number of specific plans and targets for awareness raising and training around Modern Slavery for our next financial year (1 May 2022 – 30 April 2023). We are preparing to roll out our Modern Slavery-specific training session to other key teams within Linklaters that engage with suppliers in areas where there could be a risk of Modern Slavery, including to colleagues in our HR and Technology teams.

We also have a significant program of work planned in partnership with key suppliers over the next financial year, building on the framework we have already put in place to further mitigate against the risk of Modern Slavery occurring within our supply chain. Across our Responsible Sourcing priority areas, including Human Rights and Modern Slavery, our aim is to have a greater advocacy role within the supply chain. Following the launch of our Responsible Sourcing programme, we intend to host a supplier forum focusing on cultivating a responsible supply chain. During this event we will reinforce our role in eradicating Modern Slavery and we plan to host an interactive session on the topic. Through this forum and more generally as part of our Responsible Sourcing programme, our goal is to pro-actively encourage discussion and collaboration opportunities to ensure our supply chain is a reflection of our own ethos and commitment to preventing and combatting Modern Slavery.



7. Board approvals

Linklaters' Corporate Responsibility Committee approved this statement on behalf of the members of Linklaters LLP on 20th September 2022.

The Directors of LBS approved this statement on behalf of LBS on 22nd September 2022.

Signed by:

Aedamar Comiskey

on behalf of, and as a Designated Member of, Linklaters LLP

Signed by:

Paul Lewis

on behalf of Linklaters Business Services

[linklaters.com](https://www.linklaters.com)