

## Modern Slavery and Human Trafficking Statement: 2023-2024



### 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 and through the progress made in the last 12 months. 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 through 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 working as one, inclusive team – underpin these commitments. This is our ninth Modern Slavery Statement. We recognise it is imperative to remain vigilant to Modern Slavery risks and to challenge ourselves to apply greater rigour and accountability in our approach to how these are addressed. As a business, we continue to monitor developments in tackling Modern Slavery, both in the UK and on the international stage, and welcome the opportunity to learn from and champion these measures.



**Aedamar Comiskey**, Senior Partner and Chair, Linklaters LLP

In the past 12 months, our participation in the UN Global Compact’s Business and Human Rights Accelerator programme has been a particular highlight. We know there is always more to do and there is no better network to acquire greater expertise and insight than that convened by the UN. We graduate from that programme with new ideas, a new impetus and an action plan that commits us afresh. With our ESG practice continuing to advise clients on many related issues, I am confident that we are well-placed to make further meaningful progress across our own business in the year ahead.

I close by reiterating our commitment to further strengthening the systems and initiatives we have in place to prevent Modern Slavery from occurring within both our business and our supply chain and to ensuring that these processes have a real and measurable positive impact.



### 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 2023-30 April 2024) to ensure that slavery and human trafficking is not taking place in our supply chain 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 Sustainability Committee (a sub-committee of the firm’s Executive Committee) 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 31 offices in 21 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 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 key suppliers to foster greater transparency and collaboration. A “key supplier” is a supplier that has been categorised as high value and high risk for supplier management purposes. Key suppliers account for approximately 70% of our total supplier spend. The firm’s relationship with its suppliers across our Global Head Office and UK network is overseen by a dedicated Strategic Sourcing team. Our local suppliers are managed by colleagues based in the relevant office for service provision, such as facilities management, catering and travel services.



## 3. Our policies

Linklaters is a signatory to the United Nations Global Compact (“UNGC”) and we respond annually on our progress against the UNGC 10 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. Over the last year, our lawyers have continued to dedicate time to multiple pro bono projects in this space. For example, we have continued to work with our long-term partner, Lawyers Without Borders, on numerous matters globally, including the creation of an international human trafficking case compendium, to support improved quality and quantity of prosecutions of these offences and research to support a victim-centred procedure for witness testimony in human trafficking cases. Our lawyers in Hong Kong have also continued to support HELP for Domestic Workers, facilitating the mass-digitisation of HELP’s case record systems and working to flag indicators of human trafficking during individual case reviews.

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, partners, consultants, agency staff and contractors. The Modern Slavery Policy directs to guidance about what constitutes Modern Slavery and the 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 which share our strong and accountable commitment to respecting human rights. We expect our suppliers to operate fair and ethical workplaces, where workers are treated with dignity and respect, and where the highest standards of human rights are upheld. Our Supplier Code of Conduct and 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 template contracts with suppliers. Suppliers contracting with Linklaters are also expected to promote the principles of our Supplier Code of Conduct in their own supply chains.



## 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 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. This year we also joined the UNGC’s “Forward Faster” initiative, hosting a celebration event during the week of the annual UN General Assembly in New York and throughout the year by championing the Living Wage globally as a key lever of sustainable growth.

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”, which is run by an independent organisation. During the financial year ended 30 April 2024 and delivering on our commitment set out in our previous Modern Slavery Statement, we launched a pilot network of volunteer “Speak-Up Guardians” in our London, Colchester, Madrid and Lisbon offices. The “Speak-Up Guardians” are trained to help colleagues navigate the most appropriate route to raise or escalate work-related concerns, accurately and impartially. The training resources provided to the “Speak-Up Guardians” include guidance on how to escalate any concerns raised which relate to Modern Slavery.

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 2024.

**FY2025 Area of Focus:** We will continue to advocate for the Living Wage globally, including in collaboration with others as part of the UNGC’s Forward Faster initiative.

### Our supply chain

We view the risk of Modern Slavery existing within our supply chain as being greater than within our own business. Therefore, all of our suppliers have access to the independently operated whistleblowing hotline known as “SpeakUp”. Additionally, we have implemented a robust supplier governance model to ensure that Modern Slavery is not tolerated within our supply chain. Our Responsible Sourcing programme is managed by our Responsible Sourcing Manager, whose role is to continually develop our risk-based approach to responsible sourcing, including the refinement of our due diligence processes, and

building a robust framework to assess (and act on, where appropriate) supplier scorecards. For example, we have developed a Responsible Sourcing Supplier Onboarding Questionnaire which has been issued to 100% of new key suppliers onboarded by our Strategic Sourcing Team since the launch of the questionnaire in September 2023. The questionnaire covers our priority pillars, including Modern Slavery, and assesses the supplier’s performance against our Responsible Sourcing standards and requirements.

We factor in considerations such as location of manufacture, worker vulnerability and increased industry or sector-based risks when segmenting our supply chain and have implemented further due diligence processes in the supplier relationship management framework for our key suppliers. This includes incorporating responsible sourcing into the business review process, which typically take place quarterly, half-yearly or annually subject to broader impact/risk considerations. During these business review meetings, we can probe suppliers about their progress on the responsible sourcing agenda, including human rights, explore collaboration opportunities and, where necessary, develop a series of corrective actions or set medium-term goals to enhance supplier performance.

We seek to be proactive in how we manage the threat of Modern Slavery, particularly concerning the above considerations. For example, this year we enhanced our contract with a major UK operations supplier in a sector identified as higher risk for modern slavery by incorporating stringent service level agreements (SLAs). These SLAs require the supplier to provide Modern Slavery training during inductions as well as annual refreshers for all staff. We aim to extend similar practices to other key supplier contracts. For our key suppliers, our primary assessment tool is EcoVadis, a sustainability ratings platform, which provides us with greater transparency of the sustainability progress of our suppliers (including risks associated with Modern Slavery). As of April 2024, the firm tracked 120 of its key suppliers (up from 93 as at July 2023) accounting for 80% of our key supplier spend. We strive to embed a proactive and collaborative approach to managing the threat of Modern Slavery throughout our global supply chain, and our investment in tools such as the EcoVadis platform enables us to be more efficient and rigorous in our approach.

Through the EcoVadis platform we 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. Additionally, the platform’s media monitoring feature keeps us updated on supplier-related human rights news. Since our last statement, EcoVadis has introduced a Modern Slavery dashboard that assesses our suppliers’ management processes related to modern slavery and identifies high risk suppliers for further engagement. Data from our suppliers’ scorecards is fed directly into this dashboard, aggregating and prioritising improvement areas relevant to Modern Slavery.

The EcoVadis dashboard supplements our own deep dive processes that centre around the Linklaters Modern Slavery Supplier Questionnaire. A deep dive review is conducted annually in instances where the potential risk of Modern Slavery is considered to be higher across our supply chain – for example where a supplier is operating in a high-risk sector, where the EcoVadis scorecard on a particular supplier suggests an area of poor performance across the Labour and Human Rights theme or where there is general concern arising from media monitoring.

In these instances, we issue the Linklaters Modern Slavery Supplier Questionnaire as part of that further review, which allows us to understand in more detail the degree of Modern Slavery risk and further potential mitigation/ corrective actions required. The Questionnaire includes factors such as the origin of manufacture of goods, the supplier’s recruitment practices, and Modern Slavery measures and controls in place within the supplier. The Questionnaire responses are reviewed by our Responsible Sourcing Manager. Should additional information be required, it is requested directly from the supplier, and, where necessary, escalated in line with the steps outlined in this statement.

As at the date of this statement, no cases of Modern Slavery have been identified among this cohort of suppliers for whom we conducted a Modern Slavery deep dive review. As a firm, we will continue to monitor supplier responses to EcoVadis and to our Modern Slavery Supplier Questionnaire and take appropriate action where necessary.

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 and our contractual terms and conditions. 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.

Overall, no instances of Modern Slavery within our supply chain were identified during our financial year ended 30 April 2024.

### Case study: 20 Ropemaker – Linklaters’ new London premises

As detailed in our 2023 Modern Slavery Statement, the relocation to our new headquarters (20 Ropemaker Street, London) is a strategic project for the firm, and we acknowledge that successful delivery will involve collaborating with suppliers in various high-risk sectors associated with Modern Slavery, particularly construction fit-out.

Anticipated to be ready for occupancy in early 2026, we commenced fit-out works in Spring 2024 and, in line with our Responsible Sourcing practices, continue to implement project-specific measures. For example:

- > The firm has integrated project-specific responsible sourcing tender questions relating to Modern Slavery due diligence and transparent supply chain management, allowing the project team to make informed sourcing decisions that align with the firm’s human rights and ethics goals.
- > Where appropriate, suppliers are required to designate a sustainability lead and arrange a contract kick-off meeting focused on sustainability (including Modern Slavery) considerations.

- > The firm requests suppliers cascade Linklaters’ Supplier Code of Conduct and Modern Slavery contractual requirements down the project’s supply chain. For example, the project delivery partner requires subcontractors to certify compliance with a number of clauses associated with Modern Slavery, and conducts periodic spot checks and, where appropriate, third-party audits on their supply chain to ensure compliance.
- > We continue to seek opportunities to foster collaboration and innovation with project suppliers, going beyond contractual commitments and baseline requirements.



## 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 actively monitor developments in the market for external sustainability-driven ratings to ensure that we remain aware of developing standards and expectations in this space and strive to meet them. We use external indicators such as EcoVadis and identify focus areas for the year ahead (such as the planned continuation and development of our Supplier Summit initiative, 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).

This year we have expanded our set of labour and human rights datapoints, which indicate the proportion of our suppliers with the following relevant measures in place:

EcoVadis Metrics	2022	2023	2024
Suppliers with an active whistleblowing policy on Human Rights issues	82%	73%	74%
Suppliers reporting on labour and human rights issues	42%	42%	48%
Suppliers who audit or assess their supply chain on CSR issues	67%	67%	64%
Suppliers who are a UN Global Compact signatory	55%	55%	55%
Suppliers with measures relating to working conditions	-	-	99%
Suppliers with an active supplier CSR charter	-	-	75%

As our Responsible Sourcing programme develops, we are seeing an increase in the number of our suppliers which are monitored via the EcoVadis platform. The composition of our group of monitored suppliers is also changing accordingly; in particular, we continue to engage through EcoVadis with members of our supplier base which are smaller and/or at an earlier stage on their sustainability journey. We believe this is important progress, but recognise that the increasing representation of these suppliers within a larger, more diverse portfolio is also part of the driver for the year-on-year changes in the figures shown in the table above. Further detail on this is set out in Section 6 below. Ultimately, we want to continue engaging with all cohorts of our supply chain and recognise the role we can play as a vehicle for change. As a result, we expect our supplier compliance figures on the datapoints above to continue to develop over the coming years – and we will continue to monitor, expand and act on this data on an ongoing basis.

**FY2025 Area of Focus:** Based on the labour and human rights data monitored through EcoVadis, we will continue to develop targeted initiatives for the smaller/less advanced (on sustainability) participants in our supply chain, where we believe it would be beneficial and impactful to do so, to support them in bolstering measures against Modern Slavery.

Additionally, as we take forward the learnings from the UNGC Business and Human Rights Accelerator, detailed below, it is a timely opportunity to review the key performance indicators which we monitor internally to measure the effectiveness of the Programme. Over the next year, we will be expanding the list of indicators which we monitor and will be considering further indicators for inclusion in our disclosures.



## 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 we have added a Modern Slavery-specific scenario to the new joiner induction training, to showcase the different forms that Modern Slavery may take and the escalation routes that should be followed if any Modern Slavery concerns are detected.

This year an interactive, Modern Slavery-specific, training session was delivered to our HR function (in July 2024), fulfilling the commitment made in last year's Modern Slavery Statement. The session provided a reminder of what constitutes Modern Slavery, the potential indicators of Modern Slavery, and workshopped ways in which the firm and our people can continue to take active, practical steps to ensure Modern Slavery is not tolerated in our business or in our supply chains.

In November 2023, members of our Modern Slavery Working Group collaborated with a local NGO to conduct a training session on human rights and Modern Slavery for colleagues at our Luxembourg office. The session was designed to emphasise the importance of human rights at Linklaters and to equip

attendees with the knowledge and tools necessary to identify and report human rights abuses. The training has enhanced awareness among attendees, fostering a proactive approach to human rights advocacy.

As detailed in our FY23 statement, we held our inaugural Supplier Sustainability Summit in June 2023. We have committed to hosting this summit annually, with the next one planned for autumn 2024. We continue to include Modern Slavery as a key topic, aiming to enhance our understanding of the challenges faced by our suppliers in maintaining a transparent supply chain.

**FY2025 Area of Focus:** We will host another summit or sustainability-focused event with more targeted cohorts of our supply chain, such as small-business suppliers or suppliers from a specific category of spend, on an annual basis, and with a continuing focus on Modern Slavery.

In 2024, Linklaters participated in the UNGC's Business and Human Rights Accelerator: a six-month programme curated by the UNGC and external experts to support businesses evolve their human rights due diligence processes in alignment with international standards and conventions. The deep-dive sessions and extensive peer engagement provided valuable insights on upcoming regulation and emerging best practice, and we are in the process of developing an action plan to take forward the learnings.



## 7. Tracking our progress

FY2024 Areas of Focus	Status	Commentary
We aim to deliver plans to raise awareness of how to raise workplace-related concerns (including Modern Slavery); provide training to our partners and HR team on how to best handle any issues that are raised; and pilot a network of volunteer "Speak-Up Guardians" who will be trained to help colleagues navigate the most appropriate route to raise or escalate concerns.	<span style="color: green;">●</span>	See Section 4 of this statement for detail.
Based on the labour and human rights data monitored through EcoVadis, we will develop targeted initiatives for the smaller/less advanced (on sustainability) participants in our supply chain, where we believe it would be beneficial and impactful to do so, to support them in bolstering measures against Modern Slavery.	<span style="color: teal;">●</span>	Progress is being made in this area. See Sections 4 and 6 of this statement for detail.
We will host another summit or sustainability-focused event with more targeted cohorts of our supply chain, such as small-business suppliers or suppliers from a specific category of spend, on an annual basis, and with a continuing focus on Modern Slavery.	<span style="color: green;">●</span>	Scheduled for Autumn 2024. See Section 6 of this statement for detail.
We committed to further refine our approach to Responsible Sourcing, reaffirming our priority areas in relation to Modern Slavery, and focusing on the implementation of our refreshed Responsible Sourcing Policy, Supplier Code of Conduct and internal Responsible Sourcing playbooks.	<span style="color: teal;">●</span>	Launched in 2022, this commitment is ongoing. See Sections 4 and 5 of this statement for detail.
We stated our intention to work towards setting a minimum threshold for supplier Labour and Human Rights scores on the EcoVadis ratings platform.	<span style="color: teal;">●</span>	Since 2024, EcoVadis has awarded medals based on the percentile rank of a company, calculated at the time of scorecard publication. As a firm, we are exploring the feasibility of setting minimum thresholds based on the new percentile methodology.
We committed to monitor, expand and act on the set of labour and human rights datapoints from EcoVadis scorecards on an ongoing basis to ensure continuing improvement of anti-Modern Slavery Compliance.	<span style="color: teal;">●</span>	See Section 5 of this statement for detail.
We targeted preparation and roll-out of a Modern Slavery-specific training session to further key teams within Linklaters that engage with suppliers in areas where there could be a risk of Modern Slavery, including HR and Technology.	<span style="color: teal;">●</span>	Roll-out of this training began in 2023 and is ongoing. See Section 6 of this statement for detail.
<b>Key:</b> <span style="color: green;">●</span> Completed <span style="color: teal;">●</span> In progress <span style="color: purple;">●</span> Not met		



## 8. Board approvals

Linklaters' Sustainability Committee approved this statement on behalf of the members of Linklaters LLP on 23 September 2024.

The Directors of LBS approved this statement on behalf of LBS on 27 September 2024.

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

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