



# DLA Piper Australia – Modern Slavery Statement 2022

This statement is published on behalf of the DLA Piper Australia (National Partnership) (ABN 83 508 451 308) as the reporting entity pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) in respect of the financial year ended 30 April 2022.

Other entities that are associated with the reporting entity but do not pass the reporting threshold under the Act are DLA Piper Australia (Queensland Partnership) (ABN 63 446 756 774) and PF Lawyers Pty Ltd as trustee of the Australian Services Trust (ABN 22 612 749 221).

The DLA Piper National Partnership, the DLA Piper Queensland Partnership, PF Lawyers Pty Ltd and the Australian Services Trust are under common management, and operate the same policies, procedures and controls. The partnership does not own or control any other entities.

References to “DLA Piper Australia,” “we,” “us,” “our” or the “firm” are to these above-named entities. This statement identifies the steps that we have taken to mitigate the risk of modern slavery and human trafficking occurring within our operations or our supply chains. Where reference is made to “DLA Piper”, this refers to the part of the DLA Piper global law firm operating in Europe, the Middle East, Asia-Pacific and Africa.

## Introduction

DLA Piper Australia is committed to the highest standards of professionalism, ethical behaviour and integrity in everything we do and to contributing to the wellbeing of communities around the world, and has a zero-tolerance approach to all human rights abuses. In this we are committed to opposing modern slavery in all its forms, and we do not tolerate it either within our business itself or within our supply chain.

As a firm, we are committed to adhering to the following core values in all our dealings with our clients, our people, and our communities:

- Be supportive;
- Be collaborative;
- Be bold; and
- Be exceptional.

## Our organisation structure and supply chain

DLA Piper Australia is part of DLA Piper, a global law firm operating through a number of separately constituted and regulated legal entities which provide legal and other client services in accordance with the relevant laws of the jurisdictions in which they respectively operate. DLA Piper Australia is a professional services business which predominantly employs professionally qualified and highly skilled people. Further information about the DLA Piper global law firm, including information on the countries in which we operate, can be found on our website by [clicking here](#).

Our supply chain consists of goods and services procured to enable our people to deliver these services. Our relationships with sub-contractors, suppliers and their employees, business partners, agents and others working on their behalf (collectively “Third Parties”) principally include professional services and consultancy, property, facilities management, human resources, information technology and marketing.

Working in collaboration with DLA Piper, our anti modern slavery strategy and due diligence process is developed and reviewed by a cross-functional Sustainable Procurement Working Group, including representatives from our Procurement, Property and Workplace, Responsible Business, and Office of the General Counsel teams. The Working Group is sponsored by our Chief Operating Officer and is accountable to the firm’s Executive and Board. In the last 12 months the firm has commissioned a new Procurement Assurance Committee, a cross functional group

that meets monthly to review procurement and supplier related risks and reports to the Directors of Business & Service Delivery and Responsible Business. Both these groups will integrate with our firm-wide Enterprise Risk Management which is reviewing ESG-related risks.

There have been no material changes to our organisational structure or our supply chain during this reporting period.

## Our policies in relation to slavery and human trafficking

DLA Piper's policy framework includes a range of People and Procurement policies that outline our commitment to modern slavery and human trafficking risks in our business and supply chains. Relevant policies include:

- **Human Rights and Modern Slavery Policy:** makes explicit our commitment to the United Nations Guiding Principles on Business and Human Rights, endorsed by the International Bar Association. This Policy confirms our commitment to respect and support international human rights, and in particular to the International Bill of Rights and the International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work.
- **International Inclusion Guidelines:** encourages all our people to value diversity, actively promote inclusion, respect each person's individuality, and to ensure that no partner, employee, agency worker, contractor or self-employed consultant, receives less favourable treatment on the basis of colour, race, nationality, ethnic or national origins, sexuality or gender, disability, age or religion or belief. Our International Inclusion Guidelines are further supported by relevant country level policies.
- **Ethics Policy:** embodies the key ethical obligations of the firm and our people. It is pervasive in everything we do and in all our dealings, whether directly related to the provision of legal services or otherwise.
- **Whistleblowing Policy:** offers individuals a confidential mechanism for disclosing suspicions or knowledge of possible impropriety to protect the firm, its brand, people, and clients by delivering an early warning when something goes wrong. This includes matters pertaining to modern slavery.
- **Incident Reporting Policy:** offers individuals a mechanism for reporting breaches of firm policies and procedures, and errors, acts or omissions which result in breach of the legal or regulatory obligations of individuals or the firm. All our people have a personal obligation to report such incidents promptly and honestly when identified.

- **Anti-bribery and Corruption Policy:** sets out the firm's rules and what is expected of all our people. We expect the same standard of conduct from the firm's contractors and third-party service providers in all dealings on our behalf.
- **Anti-facilitation of tax evasion policy:** sets out the firm's commitment that it will not engage in tax evasion or the facilitation of tax evasion, and articulates the role and responsibility all our people have in preventing tax evasion and its facilitation. Where appropriate, suppliers are required to adopt the same standard of conduct when acting on the firm's behalf.
- **Sustainable Procurement Policy:** outlines the firm's approach to integrating the management of environmental, social and economic issues into our procurement management systems. The policy aligns with the Universal Declaration of Human Rights; UN Global Compact Ten Principles; UN Guiding Principles on Business and Human Rights and the Fundamental Conventions of the ILO. This policy has been updated to align more closely with ISO 20400 sustainable procurement standards and is published on our external website, [click here](#).
- **Supplier Code of Conduct:** sets out our expectations of third parties providing goods and services to DLA Piper. It is aligned with the Universal Declaration of Human Rights; UN Global Compact Ten Principles; UN Guiding Principles on Business and Human Rights and the Fundamental Conventions of the ILO. This policy is published on our external website, [click here](#).

All of these policies have been made available to all of our people on our Intranet pages.

We comply with all applicable employment laws relating to employee terms and conditions.

Led by the Health and Wellbeing Steering Committee, and operating under Executive sponsorship and supported by a network of Mental Health Wellbeing Champions, the firm has driven forward its health and wellbeing programme. The firm is committed to investing in and supporting efforts to improve the mental health and wellbeing of its people, and to the creation of an environment in which everyone is able to thrive. The MyCare Employee Assistance Programme, its online app, and SPEAK Ambassador programme, a network of colleagues who have been specially trained in how to have conversations about mental health, remain in place. The firm has reaffirmed its commitment to the Mindful Business Charter, has continued an awareness campaign – Strength in Sharing – and has partnered with a third-party provider to deliver training programmes designed to equip our people and teams with practical knowledge and tools to enhance psychological health and performance, and better manage the ups and downs of life.

DLA Piper Australia is also a founding member of the Corporate Mental Health Alliance Australia, an alliance of Australian businesses dedicated to providing mentally healthy workplaces for our people.

In the last year the firm has also introduced its “New Deal” offering our people more flexibility in how and where they work, meaningful recognition and feedback, and investment in careers and ambitions. This is being delivered under three principles: we trust you, we value you, and we invest in you.

## Strategy and supply chain due diligence

DLA Piper Australia expects our suppliers to adopt the same high standards that we adhere to and have fair employment practices. These standards are reflected in the policies we share with our suppliers and ask them to commit to as part of a tender process, in the case of significant suppliers to the business. They include our Human Rights and Modern Slavery Policy and Sustainable Procurement Policy and specifically deal with modern slavery by including, amongst other things, that our suppliers ensure that employment is freely chosen, child labour shall not be used, living wages are paid and working hours are not excessive.

In the last 12 months across DLA Piper (and involving DLA Piper Australia where relevant) we have:

- Embedded a new supplier segmentation tool and carried out risk and impact assessment to assess the criticality of our suppliers and the potential risks they pose to the firm, which includes consideration of environmental and social risks. This assessment is currently completed every 2 years but will be repeated annually moving forward or where significant change is identified once a supplier management platform is implemented. The output of this assessment informs the level of the Supplier Relationship Management Framework (Total SRM) that need to be adopted to manage and build relationships with our suppliers;
- Developed the Total SRM framework, which will be rolled out in the next few months. Total SRM will ensure an effective and efficient ongoing Supplier Management and Governance approach;
- Mandated International Procurement Policy, which clearly defines the procurement processes for purchasing goods and services depending on the risk and value. This includes completion of the due diligence questionnaire on all prospective suppliers with 5 or more employees which contain questions on modern slavery. Responses to this questionnaire are considered in decisions on whether or not to accept a supplier;
- Introduced supplier Performance Improvement Plans. Where a higher risk or concern relating to labour, human rights, or modern slavery, is identified in a supplier’s operation or supply chain, consideration is given to setting objectives for improvement which is then managed through Total SRM;
- Have gone through the sourcing process to procure Supplier Management Tool, which will enable us to roll out the Total SRM Framework effectively and efficiently to all suppliers we classify as Strategic, Critical, Leverage and Tactical:
  - for suppliers in these categories, or which score high for environmental and social risk, we will be putting in place climate action plans and/or social action plans as necessary which include consideration of Modern Slavery Risk;
- Implemented a Procurement Assurance Process, to ensure that the correct procurement process is followed, as well as developed the Total SRM Assurance which will be rolled out as part of the Total SRM Framework implementation;
- Commissioned a Procurement Assurance Committee to monitor any identified 3rd party risks, and regularly reviews supplier policies and processes to ensure they remain fit for purpose;
- Implemented standardised supplier contract templates, in which consideration of Modern Slavery risk and mitigations have been embedded;
- Updated and relaunched the firm’s Anti Bribery and Corruption policy and procedure, rolled out training which is mandatory for all our people, and implemented an on-line system for managing gifts and hospitality. This includes tools to mitigate bribery and corruption risk in our supply chains; and
- Implemented the update to firm’s whistleblowing policy, procedure, and processes, and launched the third party supported Whistleblowing portal. The portal is available to both internal and external stakeholders. Whistle-blowers using this service can choose to remain anonymous.

The objective is to equip the firm to mitigate potential risks throughout the supplier engagement lifecycle from on-boarding through to performance improvement. We continue to gain further visibility across our supply chain, regularly review our data sets and risk register and ensure the continuous improvement of our approach to supply chain and modern slavery risk management.

The Sustainable Procurement Working Group’s workplan for 2022/2023 will concentrate on further embedding modern slavery and human rights risk management into all procurement processes across the firm as part of the Total SRM framework. In the coming year a full Human Rights impact assessment will be launched. This will assess Human Rights risk in both

the firm's operations and its supply chain internationally, and feedback those risks identified into the relevant management systems. Modern Slavery risk is one clear and identified target for this assessment.

## Risk assessment and management

Our primary method of assessing and addressing the risk of modern slavery is through a supply chain ESG risk assessment. DLA Piper Australia has identified a higher risk of modern slavery in connection with suppliers delivering the following services: building repairs, cleaning, catering, consumables, couriers, office fit-out, security and taxis. We also assess and manage the risk of modern slavery pre-contract with each supplier, and on an ongoing basis during contract management and review:

- Pre-contract: our standard Request for Proposals template completed by significant suppliers includes specific questions designed to identify modern slavery risk and establish what measures potential mitigation suppliers have in place. This information and the output of our other due diligence is used to decide what mitigating measures are required.
- Contract management and review: Our standard contract terms contain a clause by which we ask suppliers to commit to respecting and supporting international human rights and undertake that they will comply with their obligations under the Modern Slavery Act or any other similar legislation as well as any of our policies that are shared with them. We also reserve the right to terminate agreements with immediate effect when the supplier commits a material breach.

In some of our contracts where the risk of modern slavery is heightened, we include requirements for our suppliers to have in place:

- a policy commitment prohibiting the use of modern slavery that is approved at board or senior-management level and which sets out its expectations on personnel and suppliers/subcontractors;
- risk screening and diligence procedures to identify and monitor the risk of modern slavery;
- corrective action plans to investigate, respond to and mitigate any identified risk of modern slavery;
- training on modern slavery risk identification and management; and
- a reporting and/or whistleblowing mechanism for personnel and third parties to report any actual or suspected risk of modern slavery.

Where relevant, we also require that some suppliers pass these commitments down to their own suppliers and subcontractors.

In relation to supplier engagement, the frequency of meetings is dictated by a number of factors, including consideration of the risks posed by involvement in modern slavery. Our contracts contain a contractual right to audit our suppliers. We also receive independent feedback on our performance from certain key clients who audit their relationship with us as their suppliers.

Through ongoing supplier management routines, supplier engagement, and at break points such as contract renewal, the effectiveness of the steps taken to mitigate risk are re-assessed, and changed or enhanced where necessary.

There have been no material changes to our principal third-party suppliers, who continue to be businesses which supply services related to the running of our premises (such as cleaners, caterers, and security) and supply of the stationery and consumables needed to deliver our legal services to clients.

We recognise that COVID-19 has and will continue to impact the risk of modern slavery across a range of sectors, as does the ongoing situation in Ukraine and the economic uncertainty and instability this has created. We have undertaken and will continue to update such assessments and steps as necessary to address these and other emerging risks.

## Monitoring and Performance indicators

The DLA Piper cross-functional Sustainable Procurement Working Group holds quarterly meetings to measure the effectiveness of our strategy and continuously review our priorities and performance. The following Key Performance Indicators are used to monitor the effectiveness of our risk management processes: the percentage of Strategic and Critical suppliers that have agreed to our Supplier Code of Conduct.

- the percentage of Strategic and Critical suppliers that have agreed to our Supplier Code of Conduct;
- the percentage of Strategic and Critical suppliers who have social or environmental objectives in place; and
- the percentage of our people with procurement responsibilities across all locations who have received training on the Modern Slavery Act/sustainable procurement.

These are annual targets reviewed at the end of each reporting period. Our target for these key performance indicators is 100%.

## Reporting concerns

Our values promote an open and collaborative culture in which people can speak up safely and in confidence. The firm encourages its people to report concerns to managers, supervisors, and to human resources, alongside which it has two more formal reporting mechanisms in place:

- Incident reporting: to report errors or omissions which result in failures to comply with the firm's policies and procedures, or which could result in a breach of legal or regulatory obligations; and
- Whistleblowing: a confidential mechanism for individuals to disclose suspicions of impropriety or wrongdoing.

Disclosures related to modern slavery can be made via any of the above mechanisms in confidence.

## Training

Since 2020 employees involved in procurement activity on behalf of DLA Piper Australia, within Australia and across DLA Piper, have received mandatory training on modern slavery and human trafficking. The training incorporates references to the Sustainable Procurement Policy, Total SRM, Supplier Code of Conduct and other enhancements to the firm's approach. The completion rate for this round of training was 100%.

In 2022 we have launched new and enhanced training for those involved in procurement activity. This new training has been targeted to a larger number of people (218 up from 128, 19 based in Australia), as at the date of this statement 59% of these had completed the enhanced training (58% in Australia). We are aiming for a 100% completion rate.

Recognising that other categories of people also contribute indirectly to procurement activity, and otherwise might have a role, we have created a second shorter training module which will be rolled out to everyone working in business services during 2023.

The topic of sustainable procurement has already been integrated into the firm's new starter induction presentation for staff involved in procurement. All of DLA Piper Australia's people are required to undertake mandatory training on policies relevant to their roles and responsibilities, and assurances on compliance is obtained via the firm's annual Compliance & Professional Indemnity Declaration.

## Responsible Business

At DLA Piper Australia, we believe great businesses can make a better world. That's why, every day, we help our clients to succeed, and be responsible, sustainable businesses. Our view is that, together, we can make business better.

We have a responsible ethos and care about our people, our communities and the environment, and uphold high governance and ethical standards. As a firm, we actively engage with our people, our clients and our communities to understand evolving expectations, and ensure we meet and exceed those expectations.

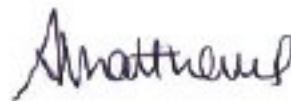
Our Responsible Business strategy encompasses our approach to our people, our communities and partners, and the environment. The Responsible Business team also ensures the firm has a joined-up approach to Sustainability and ESG work with our clients, supporting our service areas and lawyers with clarity on social and environmental risks and opportunities.

DLA Piper Australia is an executive member of the Australian Legal Sector Alliance, an industry-led association working collaboratively to promote best practice sustainability commitments and performance across the legal sector.

DLA Piper has been a signatory to the UN Global Compact (UNGC) 10 Principles since 2013. We have aligned our strategies and operations with the universal principles on human rights, labour, anti-corruption and the environment. We publish an annual Sustainability Report, to reaffirm our commitment to these principles and demonstrate our progress in working to achieve them. Since the Sustainable Development Goals (SDGs) were agreed in 2015, we also embraced them as a guiding framework for achieving positive impact. Our latest Sustainability Report is published on our website, [click here](#).

## Management approval

The Board of DLA Piper Australia approved this statement on behalf of the Partners on 22nd December 2022 and is signed by Amber Matthews, Managing Partner, Australia.



Amber Matthews, Managing Partner, DLA Piper Australia

