

# Anti-slavery and human trafficking policy and statement

**Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.**

Womble Bond Dickinson (UK) LLP and Womble Bond Dickinson Wealth Limited (together referred to as **we, us or our**) are committed to acting ethically and with integrity in all our business relationships and take a zero tolerance approach to slavery and human trafficking. We aim to comply with the Modern Slavery Act 2015 (**MSA**) and expect our suppliers, and their supply chains, to take all reasonable and practical steps to comply with the MSA. We also expect our suppliers, and their supply chains, to engage in good employment practices and to comply with all relevant legislation and regulations in the countries in which they operate. This statement and policy covers services provided from our offices in the UK.

## **Our organisation**

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

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

We do not have intricate supply chains. Our suppliers are primarily providers of equipment and maintenance and support services for our offices.

## **Our policies**

The following policies are relevant to monitor and reduce the risk of modern slavery occurring within our business or its supply chains:

- this Anti-slavery Policy and Statement;
- Procurement Policy;
- corporate social responsibility policies and procedures; and
- Reporting Breaches and Whistleblowing Policy and Procedure.

## **Steps for the prevention of modern slavery**

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

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

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

### Further actions

Our Procurement Policy sets out minimum standards (**Minimum Standards**) which require suppliers to confirm that they are taking all reasonable and practical steps to comply with the MSA in their own supply chains.

We continue to monitor and reduce the risk of modern slavery occurring in our business and supply chains by:

- requiring all new major suppliers to confirm compliance with our Minimum Standards;
- requiring all existing major suppliers to confirm compliance with our Minimum Standards on an annual basis; and
- implementing training for support teams involved in procurement.

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

### Training, responsibility for and compliance with this policy

Support teams involved in procurement have been trained to enable them to identify the risks of modern slavery and to respond appropriately.

We raise awareness amongst all our staff of the risks of modern slavery in our business and supply chains as part of our induction process for new joiners and by way of annual reminders to existing staff.

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

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

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

### Statement

This policy sets out the steps which we have taken and are continuing to take to ensure that slavery and human trafficking is not taking place in any part of our UK business or supply chains. This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Womble Bond Dickinson (UK) LLP (and its wholly owned subsidiary, Womble Bond Dickinson Wealth Limited) for the financial year ending 30 April 2017. This policy and statement was approved by the Board of Bond Dickinson LLP on behalf of its members on 11 October 2017. On 1 November 2017 Bond Dickinson LLP changed its name to Womble Bond Dickinson (UK) LLP and Bond Dickinson Wealth Limited changed to Womble Bond Dickinson Wealth Limited.

**This policy and statement was signed by:**



**Jonathan Blair** Managing Partner

