

Modern Slavery Act 2015, annual transparency statement

Gowling WLG (UK) LLP is a limited liability partnership registered in England and Wales (registered number OC304378). We are a global provider of legal services and operate from offices in the UK, Belgium, China, France, Germany, and the U.A.E. Along with Gowling WLG (Canada) LLP we are members of Gowling WLG International Limited, a company limited by guarantee registered in England. However, Gowling WLG (Canada) LLP and Gowling (UK) LLP operate and carry on business as independent and autonomous entities and Gowling WLG International Limited does not provide legal or other services to clients. [See more information on our legal structure.](#)

As a provider of legal services we do not have a particularly long or complex supply chain - our main suppliers are providers of office supplies and support services (such as reprographics, transcription services, printing and scanning), IT services and equipment and facilities management. We are nevertheless committed to preventing acts of modern slavery and human trafficking from occurring within both our business and our supply chain. We expect all of our suppliers to conduct their business in a lawful and ethical manner, including adopting business practices that prevent or eliminate modern slavery and human trafficking from taking place.

We develop strong and deep relationships with our suppliers, and trust and transparency is embedded in everything we do. This is key to our approach to corporate responsibility, and in turn, combating modern slavery. We are in the process of preparing to become participants in the UN Global Compact and will be communicating our commitment to support the Ten Principles of the UN Global Compact on human rights, labour, environment and anti-corruption within the next year and thereafter we will be submitting our Communication on Progress on an annual basis. We have also become members of Social Enterprise UK and we marked Modern Slavery Day with firm-wide communications and an awareness day. We encourage our suppliers to follow practices consistent with our values and corporate responsibility aims and regularly work with others to increase the positive impact we have. Where ever possible, we invite our onsite suppliers to join us in our campaigns.

We are also accredited as a Living Wage Employer, and pay the Living Wage (which is above the government determined minimum wage) to our own people and our regular onsite UK contractors. By extending this commitment beyond our own employees we are helping to improve standards and working conditions within our supply chain.

We also require our suppliers, both current and prospective, to achieve certain standards in areas such as information risk, management of employees, legislative compliance, business continuity and environmental standards. If we identify a supplier or prospective supplier as being at risk of not achieving these standards (including in relation to compliance with the Modern Slavery Act 2015) then we work with them to address the risks. If we are not able to agree a resolution, this may lead to us ending our relationship with them.

We have reviewed our entire procurement process to ensure consistency in our approach to engaging with suppliers and more transparency of their ways of working. We place a greater emphasis on corporate responsibility, environmental and diversity requirements. These reviews are ongoing so that we can ensure continuous improvement. As part of our ongoing work in this area, we:

- a. **Continuously review our existing supply chain** to specifically assess potential modern slavery risks, this includes reviewing the nature of the work our suppliers do for us, whether that involves the provision of skilled or unskilled labour and also assessing individual suppliers based on an evaluation of their own practices and procedures;
- b. **Are continuing to map our supply chain, assessing risk** against geographical location and applying methods, such as the Corruption Perception Index, to help quantify risks existing in certain countries
- c. **Are continuing to embed our Supply Code of Conduct** which gains commitment from our suppliers to adhere to our standards, including in relation to compliance with the Modern Slavery Act 2015;
- d. **Include a "Responsible Business" evaluation as part of our sourcing process** to gain a level of knowledge of the businesses within our supply chain, better visibility of their processes and to help identify how we might be able to support each other;
- e. **Are continuing to embed a consistent approach throughout our organisation to ongoing supplier management** incorporating standard governance processes and templates to ensure that risks are monitored and improved
- f. **Have become members of Social Enterprise UK**, an organisation which has created the world's largest commitment to social procurement through the Buy Social Corporate Challenge;
- g. **Are in the process of** preparing to become participants in the UN Global Compact the UK network that aims to further the UN Global Compact's Ten Principles that cover human rights, labour, environment and anti-corruption and serves members through regular meetings to share best practice and working groups and
- h. **Continue to ensure that our procurement team receive external training** and increased awareness, attending training, external seminars and conferences.

Whilst we develop our approach to combating modern slavery and human trafficking we will continue to assess and manage any risks on an on-going basis. We will continue to apply the same high ethical standards to both our employees and suppliers with clear accountability for failing to meet them.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Gowling WLG (UK) LLP's modern slavery and human trafficking statement for the financial year commencing 1 May 2017 and ending 30 April 2018.

The Gowling WLG (UK) LLP Executive Board approved this statement on 16 October 2018.

Signature:



David Fennell
Chief Executive Officer and designated member
Gowling WLG (UK) LLP

Date signed: 16 October 2018