

## Slavery and Human Trafficking Statement

October 2022

This statement is made by DAC Beachcroft LLP on behalf of itself and its wholly owned subsidiaries, DAC Beachcroft Claims Limited and DAC Beachcroft Services Limited, which operate as part of the DAC Beachcroft group. This annual statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement.

### Our Business and Structure

DAC Beachcroft is a leading international legal services business with more than 2,500 people across the UK, Europe, Asia-Pacific and Latin America. Our international and UK teams of lawyers and advisors work with clients across a range of industries and are market-leaders in the insurance, health and real estate sectors. For more information about our services, please click [here](#).

DAC Beachcroft LLP is a limited liability partnership registered in England and Wales (registered number OC317852) and is the parent undertaking within the DAC Beachcroft group. The DAC Beachcroft group is made up of separately constituted and regulated legal entities, providing legal services in their respective jurisdictions.

DAC Beachcroft Claims Limited is a limited company registered in England and Wales (registered number 04218278).

DAC Beachcroft Services Limited is a limited company registered in England and Wales (registered number **05560211**).

For further information on our group structure, please click [here](#).

### Our Approach

We have a zero-tolerance approach to modern slavery and human trafficking and we are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or within our supply chain.

Prior to entering into business relationships with clients, we undertake due diligence in order to identify any potential legal, regulatory and/or reputational risks. We proactively monitor and manage these relationships to understand the risks faced by our clients and our ability to support them. Third party services and goods procured are the result of transparent, objective, risk-based decision making processes that are compliant with all applicable laws and regulations. Being a responsible business is fundamental to the way we behave, and we have developed a cohesive and interconnected Environmental Social & Governance (ESG) strategy to help us deliver on our purpose and our commitments. For information about our approach to ESG, please click [here](#).

Our Procurement function continues to adopt the CIPS Corporate Code of Ethics and retains a Corporate Ethical Procurement and Supply accreditation. This ensures that our business is not, directly or indirectly, adversely affecting the environment or otherwise putting itself at risk in terms of its supply chain. A number of our procurement colleagues hold CIPS qualifications and we are actively supporting others who are working towards this.

## **Our Policies**

We are committed to ensuring that there is no modern slavery or human trafficking within our supply chains and expect the same high standards from those with whom we work. We have a number of policies in place to support our approach which include:

- Our anti-slavery policy which affirms our zero-tolerance approach to modern slavery and human trafficking, together with our commitment to being an ethical, sustainable and responsible business. Colleagues are reminded of their responsibility to report any concerns or suspicions via our whistleblowing policy.
- Our procurement policy which governs the way in which we engage and work with our suppliers and applies to everyone in our business regardless of the jurisdiction. It demonstrates our ongoing commitment to sourcing goods and services from ethical and diverse enterprises.
- Our recruitment and pre-employment screening policies which affirm our use of vetted and approved recruitment agencies only. Colleagues at all levels (who are engaged under a contract of employment) undergo pre-employment screening. We are an accredited Living Wage Employer and none of our colleagues are paid less than the current UK National Living Wage.
- A dedicated wellbeing programme where colleagues have access to a wide range of support tools. We have a network of trained mental health champions across our offices to further support our colleagues.

Policies are reviewed annually (or sooner in response to legislative or regulatory change) and are available to all colleagues on our intranet.

## **Our Suppliers and Due Diligence**

Our supply chain encompasses four core categories covering: information and communications technology; professional and consultancy services; site and maintenance services; and travel and conferencing. Since our last statement, there have been no material changes to our principal third-party suppliers.

Suppliers are required to agree our minimum commercial terms. These include:

- Warranties that no slavery is used anywhere in the supplier's business or its supply chain and that all necessary processes and policies are in place to ensure that this remains the case; and
- Indemnity provisions and rights to terminate for breach of our anti-slavery requirements.

All suppliers (including their sub-contractors) are expected to adhere to our supplier operating principles, some of which are set out below. They must:

- have management systems in place for delivering and monitoring contractual compliance in line with the due diligence responses for their own operations and those of their sub-contractors.
- comply with all relevant legislation in the countries in which they operate and all relevant International Labour Organisation conventions.
- communicate their expectations for compliance on all the issues raised within the due diligence responses to all of their relevant employees and sub-contractors/supply chain.

Due diligence responses allow us to assess the risk of modern slavery and human trafficking in the supplier's business and their supply chain. We use heat/risk maps to define the level of risk by considering probability and business impact. Should suppliers fail to meet our standards or be unwilling to make any changes, we will cease to engage with them.

Further steps we have taken to help mitigate the risk of slavery and human trafficking in our supply chain, include:

- ensuring risk areas are documented, monitored and taken into consideration in any future contract renewals;
- ongoing monitoring of suppliers, having regard to their risk categorisation (critical, key or operational), during the lifecycle of our business relationship; and
- ensuring local legislation is considered prior to procuring services for our international offices.

### **Our Risk Assessment**

Our business-wide risk assessment reflects the policies, controls and procedures we have in place to mitigate modern slavery risks. This is reviewed and, where appropriate, updated annually or more frequently in the event of a significant structural change, the introduction of a significant new work stream, the opening of an office in a new jurisdiction, a change to the legal framework or any other major change that could influence the risk to our business. The risk of modern slavery and human trafficking occurring within our business and supply chain remains low and we have adequate controls in place to manage, monitor and mitigate such risks.

### **Training and Awareness**

We are committed to ensuring that our colleagues understand what modern slavery and human trafficking is, are able to identify associated red flags and are aware of the actions they must take should they have any concerns. In addition to the policies set out above, we have a modern slavery and human trafficking e-learning module which can be accessed by all colleagues at any time.

In response to guidance issued by the National Crime Agency, modern slavery training is compulsory for our Employment and Real Estate legal teams, along with our HR, Finance, Procurement and Practice Governance and Risk functions. Training completion rates are actively monitored to ensure compliance.

Each year, a business-wide communication is published reminding colleagues of our zero-tolerance approach to modern slavery and human trafficking and highlighting our policies and procedures.

### **Measuring Effectiveness**

Over the last 12 months,

- our procurement colleagues have successfully completed their modern slavery and human trafficking e-learning course;
- new trade suppliers to our business have followed the applicable procurement process including the completion of due diligence questionnaires; and

- a risk mapping exercise of each tier of our supply chain was completed in order to assess whether the tier assigned remained appropriate.

Looking to the year ahead, we are committed to:

- building on the risk mapping exercise in preparation for the implementation of a vendor risk management tool. This tool will enable us to streamline our supplier on-boarding process; apply risk scoring (taking into account a number of factors e.g. location, length of business relationship, financial data, company structure, and adverse media, etc.); and enable us to effectively manage our supply chain on a continual basis;
- carrying out on-site or remote audits of critical suppliers, where applicable, to re-verify their due diligence responses (including responses relating to compliance with modern slavery legislation); and
- further developing our ESG strategy keeping in focus the wellbeing of our colleagues and those we do business with to ensure we continue to have a positive impact on the societies and the economies of the regions in which we operate.

### **Ongoing Commitment**

We will continually review our systems to ensure we have robust policies and processes in place to mitigate the risk of modern slavery and human trafficking within our business and our supply chain.

Copies of our previous statements can be found by clicking on the links below:

- [Slavery and Human Trafficking Statement – October 2020](#)
- [Slavery and Human Trafficking Statement – October 2021](#)

### **Approvals**

This statement was approved by the DAC Beachcroft LLP Group Board on 6 October 2022 and signed by our Designated Member and Senior Partner.



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**Virginia Clegg**  
**Designated Member**  
**DAC Beachcroft LLP**  
**11 October 2022**