

## **Gowling WLG (UK) LLP**

### **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. [For more information on our legal structure, please click here.](#)

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 joined the UN Global Compact (UNGC) in 2020 and in doing so committed to support the Sustainable Development Goals, the Ten UNGC Principles and key themes of human rights, labour, environment and anti-corruption. We are active participants in the Business and Human Rights Accelerator which, spanning six months from February to July 2024, is a pivotal step toward translating our UNGC commitment into meaningful action.

We use the following annual activities to inform improvement and report progress on environmental, social and governance (ESG) topics including themes relating to modern slavery:

- [UNGC Communication on Progress \(CoP\) questionnaire introduced by the UN in 2023](#)
- Sustainability report (due Winter 2023/4)
- External ESG audit (currently carried out by EcoVadis)

For our most recent CoP, material human rights topics connected with operations and/or the value chain were identified: forced labour; non discrimination in respect of employment and occupation; working conditions (wages, working hours); digital security/privacy; and gender equality and women's rights. During this exercise, a Board level representative for human rights was agreed and further activity identified and added to the ESG Strategy activity plan.

New joiners to the firm are required to undertake e-learning to raise their awareness of modern slavery, risk areas and common signs, as part of their induction training. We encourage our suppliers to follow practices consistent with our values and responsible business aims, and regularly work with others to increase the positive impact we have. When possible, we invite our onsite suppliers to join us in our campaigns.

We have been certified as a [Living Wage Employer by the Living Wage Foundation](#). The new Living Wage rates for 2023/2024 will be announced on Tuesday 24 October 2023 with an implementation date within six months.

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 continue to review our entire procurement process to ensure consistency in our approach to engaging with suppliers and more transparency of their ways of working. We are constantly updating and improving our processes as part of our continuous improvement programme. As part of our ongoing work in this area, we:

- (a) **Are continuing to embed our Supplier Code of Conduct** in order to gain commitment from our suppliers to adhere to our standards, including in relation to compliance with the Modern Slavery Act 2015;
- (b) **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;
- (c) **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;
- (d) **Continue to ensure that our procurement team receive external training** and increased awareness, attending training, external seminars and conferences; and
- (e) **Are delivering** Modern Slavery e-learning to our employees and clearer direction on how to report any incidents.

We will continue to develop our approach to combating modern slavery and human trafficking, assess and manage any risks on an on-going basis and develop key performance indicators to measure the effectiveness of our ongoing work.

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 2022 and ending 30 April 2023.

The Gowling WLG (UK) LLP Executive Board approved this statement on 11<sup>th</sup> October 2023.

Signature:

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

Date signed: 11<sup>th</sup> October 2023