

## MODERN SLAVERY STATEMENT

Issue date: 22-12-2022 – Version 1.0

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### 1 BACKGROUND AND PURPOSE

De Brauw Blackstone Westbroek N.V. ("**De Brauw**") is a leading law firm providing a full and extensive range of legal services to its national and international clients. In adhering to the highest standards of professionalism, ethics and integrity in all of our work, we condemn slavery and human trafficking in any shape or form.

This statement is made on behalf of De Brauw pursuant to section 54(1) of the UK Modern Slavery Act 2015. It outlines the steps we have taken through 31 December 2022 to identify and reduce the risk of modern slavery in any of our supply chains or in our business. It also underlines our commitment to ensuring that all De Brauw staff are treated fairly and with the attention, courtesy, respect and consideration that every human being deserves.

### 2 OUR VALUES

We pursue excellence in every aspect of our business. By observing the highest ethical and professional standards, and acting with integrity in everything we do, we embody our core values of being courageous, curious and collective. These values describe our culture, the way we work, and what we stand for.

Slavery and human trafficking are serious human rights offences that De Brauw condemns in any form. We have zero tolerance for the presence of either within our business or supply chain.

As signatory to the United Nations Global Compact, and within our sphere of influence and in our role as professional advisers, we are committed to also supporting its principles in the areas of human rights, labour standards, the environment, and anti-corruption.

### 2 OUR ORGANISATION

De Brauw is a public limited liability company with its corporate seat in Amsterdam and with offices in the Netherlands, London, Brussels, Shanghai and Singapore. We provide our clients with legal expertise in accordance with the relevant laws of the jurisdictions in which they operate. Further information on our business model, including how we are regulated, can be found on the [Legal Information](#) section of our website, [www.debrauw.com](http://www.debrauw.com).

As a professional services firm, and because of the nature and work of our supply chains, we believe that the risk of modern slavery and human trafficking for us is relatively low. Even so,

De Brauw is alert to the pressures and risks that can take place, and we take all necessary steps to ensure that such conduct or activity does not occur anywhere in our business or supply chains.

Our compliance and procurement teams are aware of risks related to modern slavery and human trafficking and include their awareness in all activities related to the supply chains. This awareness will be improved by yearly training.

### **3 OUR SUPPLY CHAIN RELATIONSHIPS**

As a law firm, our basic supply chain model supports our core legal practice and maintains our offices and technology infrastructure. Our suppliers are those that provide:

- business services – products and services that help to maintain normal day-to-day service, including catering, cleaning, security, print and document services;
- professional services – includes external training, audit services and advisory services in regulation and insurance;
- real estate – all products, facilities and services connected with the premises from which we operate our business; and
- technology – the systems, software, equipment needed to maintain the international delivery of legal services.

Most of our key suppliers are based in the Netherlands and are protected by national employment protection legislation, including protection against human rights violations. Our supply chains are often short, and we have long-term relationships with our suppliers to ensure that they share our values. This also helps us optimise our ability to conduct effective due diligence when assessing whether to form, continue, or renew our relationship(s) with them.

Our procurement team – along with our finance department - manages the procurement of high-value and/or high-risk goods and services in accordance with our Sustainable Procurement Policy and our Code of Business Conduct. We expect all our suppliers to have fair employment practices and require them to sign our Code of Business Conduct to verify their ability and commitment to follow its terms and any requirements of our Sustainable Procurement Policy.

### **4 POLICIES**

#### **Code of Business Conduct**

The following policies, frameworks and procedures are directly relevant to the issues discussed in this statement and are available to all employees on the intranet:

- **Code of Business Conduct**

Our commitment to observing fair employment practices in relation to our own employees is embodied in our Code of Business Conduct. This provides information about how we approach our day-to-day activities, and the principles in it are covered in our onboarding introductory sessions for new employees and reinforced in ongoing training sessions. The Code of Business Conduct also reiterates our zero-tolerance approach to child labour, forced labour, modern slavery and human trafficking.

- **Sustainable Procurement Policy**

This policy includes specific procedures relating to how the presence of slavery and human trafficking risks are identified and assessed through our procurement processes.

- **Act Responsibility Framework** (to include our Whistleblowing Policy; Speak Up Policy; and Harassment Policy and Complaints Procedure)

This framework sets out De Brauw's approach to preventing any discrimination, harassment, bullying or victimisation from occurring in the workplace. There are internal and external confidential advisers to whom employees can reach out in confidence for advice on such issues, and a works council which represents and seeks to represent and safeguard the rights and interests of all employees;

- **Inclusion and Diversity Statement;**

- **Recruitment Procedure; and**

- **Labour Policy.**

As an equal opportunity employer, we are committed to creating a non-discriminatory and respectful working environment for all employees. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work, feel safe, and are equipped to thrive. Our dedicated Human Resources department deals with employment and welfare issues, and works closely with heads of departments/team leaders to ensure that staff issues are identified quickly and addressed appropriately. We run several internal programmes to invest in and promote the health and wellbeing of our employees, employ an internal well-being coach, and have an in-house director of culture and inclusion.

## 5 OUR CLIENTS AND OUR PRO BONO PRACTICE

In addition to De Brauw's own values, processes and safeguards operating internally and across our supply chains, through our [pro bono practice](#), we also provide support to human rights charities and non-government organisations combatting human trafficking. One example is our partnership with UNICEF.

Our Business and Human Rights Litigation practice also works with our clients advising them on how to detect modern slavery and human trafficking.

## **6 UNITED NATIONS GLOBAL COMPACT**

We continually refine and align our strategy so that it incorporates sustainability in the broadest sense, across all aspects of our business. We are committed to playing our part in achieving the United Nations' Sustainable Development Goals.

De Brauw became a signatory to the United Nations Global Compact in 2021. This commitment includes our support of the Ten Principles of the United Nations' Global Compact on human rights, labour, the environment and anti-corruption, and our commitment to:

- make the United Nations Global Compact and its principles part of our strategy, culture and day-to-day operations;
- engage in collaborative projects which advance the broader development goals of the UN, (particularly the Sustainable Development Goals), and
- measure and report on the outcomes and our progress.

As a signatory to the United Nations Global Compact, we follow the Ten Principles in how we work with suppliers, our engagement with clients, our culture and how we support employees, as well as meet our carbon reduction ambitions, the pro bono work we do and our community involvement. Our supplier engagement, ethics and culture of integrity are central to ensuring that slavery and human trafficking do not take place in the firm's supply chains.

This policy was approved by De Brauw's management board on 22 December 2022.