## **Modern Slavery Policy**

## 1.1.1 What is Modern Slavery?

(a) Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, human trafficking and committing an offence with intent to commit human trafficking (including aiding, abetting, counselling or procuring a human trafficking offence), 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.

## 1.1.2 Policy and Modern Slavery Statement

- (a) The firm has a zero-tolerance approach to modern slavery. It is our policy to be committed to:
  - (i) Ethical and integrity-driven business practices aiming to establish effective systems to prevent modern slavery within our own business or any supply chains.
  - (ii) Transparency aligning with the obligations under the Modern Slavery Act 2015.
  - (iii) High standards we expect the same standards from all our contractors, suppliers and other business partners.
  - (iv) Procurement processes we identify, assess and monitor risk within our supply chains and act to protect whistleblowers.
- (b) Our Modern Slavery Statement is shown on our website at the bottom of the home page and is available by request from the COLP.

## 1.1.3 Who must comply with this policy?

- (a) The policy applies to:
  - (i) All persons working for us including owners, managers, employees, consultants, agency workers, temporary workers and volunteers.
  - (ii) All persons working for or on behalf of DMA Law in any capacity; and

(iii) Those who supply goods and services to us as part of our supply chains.

## 1.1.4 Who is responsible for the policy?

- (b) The COLP has overall responsibility for
- (c) ensuring the policy complies with legal and ethical obligations, and that those under our control comply with it.
- (d) implementing the policy, monitoring its use and effectiveness, dealing with any queries about it
- (e) auditing internal control systems and procedures to ensure they are effective in countering modern slavery in any form, within our supply chains and our business.

# 1.1.5 Compliance and your responsibilities

- (a) In order to comply with the policy and for it to be effective you must:
  - (i) Avoid any activity which may lead to, or suggest, a breach of the policy.
  - (ii) Notify the COLP as soon as possible if you believe a conflict with the policy has, or may, occur.
  - (iii) Raise concerns with the COLP about any issue or suspicion of modern slavery in any parts of the business or supply chains.
  - (iv) Report any breaches (including possible future breaches) to the COLP in accordance with the Whistle Blowing Policy.
- (b) If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains, constitutes any of the various forms of modern slavery, please raise it with the COLP (or the MLCO if the COLP is not available).

#### 1.1.6 Protection

- (a) We are committed to ensuring that no one suffers any detrimental treatment as a result of such reporting, such as dismissal or threats.
- (b) The firm's *Whistle-Blowing Policy* also provides information regarding making a protected disclosure and who you can speak to should you have any concerns.

## 1.1.7 Training and Communication

- (a) Training on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided, as necessary, on an ongoing basis.
- (b) Our zero-tolerance approach to slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate after that.

#### 1.1.8 Breaches

- (a) Breach of the policy will lead to disciplinary action, which could result in dismissal for misconduct or gross misconduct in accordance with our Disciplinary Procedure.
- (b) We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

#### 1.1.9 Interaction with other Policies and Procedures

- (a) Whistleblowing Policy
- (b) Disciplinary and Grievance procedures
- (c) Induction procedures
- (d) Suppliers Approved Supplier List