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London Partner Lucy Blake Discusses UK Forced Labor Due Diligence Proposal in *Law360*, *POLITICO Pro*, and *Forward Law Review*

Publications

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London-based Partner Lucy Blake spoke with *Law360 UK*, *POLITICO Pro*, and *Forward Law Review* about the UK government's announcement that it will introduce mandatory human rights due diligence for large businesses, including a new power to remove goods made with forced labor from the market. The regime would apply to UK businesses with global turnover of more than £350 million and to non-UK businesses with more than £350 million in UK turnover.

Lucy emphasized that the compliance exposure extends beyond regulatory enforcement: "A due diligence statement is itself a record and can expose a company to litigation and media scrutiny."

Lucy noted that the proposal identifies no financial penalties, with the power to remove goods from the market as the sole enforcement mechanism, which she described as "a backstop, not a gate." She also observed that the UK threshold of £350 million is well below the revised threshold under the European Union's Corporate Sustainability Due Diligence Directive (CSDDD), meaning some businesses outside the EU regime may still be captured. For companies operating in both the United Kingdom and United States, she advised that due diligence statements must satisfy UK regulators, withstand scrutiny in UK courts, and avoid controversy in the current US political environment.

Lucy is a partner in the firm's Investigations, Compliance and Defense Practice and Co-Chair of the firm's Human Rights and Global Strategy Practice. She advises on ESG risks arising from human rights and climate impacts in companies' supply chains and on multijurisdictional issues involving conflicts of laws.

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