

# BRACEWELL

## **Modern Slavery Statement**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015.

## **Organisation structure**

Bracewell UK (LLP) – the “Firm” - is a limited liability partnership registered under the laws of the State of New York, USA and which is authorised and regulated by the Solicitors Regulation Authority of England and Wales (SRA ID:555941). It is affiliated to Bracewell LLP which is registered under the laws of the State of Texas, USA and is headquartered in Houston. Bracewell LLP operates internationally with offices across the US and in Dubai.

## **Policy**

Bracewell UK is known worldwide for its depth of legal knowledge about and experience with the sectors in which it operates and in which its clients are based. This meticulousness extends throughout its business operations and ensuring supply chains are neither knowingly or unknowingly complicit in activities that constitute modern slavery or human trafficking. This Statement describes out the steps the Firm is taking to assess and manage the risk within its business, to measure the effectiveness of those steps and to ensure that all relevant staff receive appropriate training.

In addition, Bracewell UK’s Whistleblowing policy encourages the internal reporting of any concerns that the Firm or a colleague, or a client or other third party, has failed to adhere to its professional, statutory, and other legal obligations or good business practice in some way. The Firm encourages openness and will support anyone raising a genuine concern. In the event that a person does not feel able to make an internal report we recommend that they seek guidance and support from Protect, the UK’s whistleblowing charity for wrongdoing in the workplace.

## **Supply chains**

Bracewell UK’s supply chains are typical of a professional services business and include procurement of office space, IT and technology, agency staff, cleaning, catering and security staff and the procurement of other professionals such as accountants, solicitors and barristers. Although the Firm considers that its operations represent a relatively low risk in relation to modern slavery or human trafficking the Firm also recognises that to play its part in the fight against slavery and trafficking it must be diligent in its relationships with the businesses in its supply chain and expect of them the exacting moral and ethical standards that it demands of itself.

## **Due diligence process**

Bracewell LLP’s procurement procedures apply to Bracewell UK’s operation and through the process suppliers are assessed by reference to the size of their contract and its importance to business operations. As a result, Bracewell UK has been able to identify its key suppliers and, where applicable, Modern Slavery Statements have been obtained from them. Where no statement exists, the Firm has requested the supplier to confirm its commitment to the principles of operating in a slavery and trafficking free way and to take action wherever there are contra indicators.

## **Risk Assessment**

Before the Firm’s next statement, it expects to complete an assessment of remaining contracts in relation to the location from which the service or goods are supplied and what is commonly known about the employment practices of those locations. It will enable the Firm to identify any slavery and

trafficking risks in its lower value contracts. Where risks or issues are found, if the Firm can positively influence the practices of that supplier it will do so, but any unwillingness to engage or improve practices will result in the termination of the Firm's relationship with it at the next available opportunity.

### **Training**

Introductory training on the requirement of the Modern Slavery Act and how its business operations may be affected has been delivered to the Bracewell UK and Bracewell LLP Senior Managers responsible for Recruitment, Operations and Accounting and they have been involved in the preparation of this statement. Before the next statement the Firm expect to deliver training on the Modern Slavery Act and how its business operations may be affected to all Bracewell UK staff and partners plus all other Bracewell LLP staff involved in procurement.

The training will reinforce the Firm's expectations that people stay alert to slavery and trafficking indicators and their obligation to report concerns and reassurance that they can do so with confidence. It will also request feedback and ideas on other ways to prevent its business operations becoming involved with slavery and trafficking.

### **Measuring effectiveness**

Before the next statement the Firm expects to be in a position to be able to assess the following key performance indicators to measure the effectiveness of its actions:

- The number of staff and partners trained and the suggestions received
- The number of Modern Slavery statements collected from key suppliers
- The amount of engagement entered into with suppliers who do not have a Modern Slavery statement

### **Approval**

This statement was approved on behalf of the LLP by the Management Board on 16 August 2022.

Signed:

Date:



Jennifer Weston, Management Board Member and Corporate Partner