

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

The Firm 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 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, the Firm’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

The Firm’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.

Risk Assessment

Although the Firm considers that the nature of its business means 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 the Firm’s operation and through the process suppliers are assessed by reference to the size of their contract and its importance to business operations.

Since its’ last statement, the Firm has:

- Carried out a review of all vendors. The review included an assessment of the location that the goods or services are provided from and whether they may pose a higher risk for modern slavery. It also included an assessment on the vendor’s publicly stated position with regard

to modern slavery to enable us to identify those giving rise to any concerns that need to be addressed.

- Updated our vendor questionnaire to require the vendor to confirm compliance with modern slavery and anti-human trafficking laws in the jurisdictions in which it operates
- Rolled out 'Eliminating Modern Slavery' e-learning to all partners and employees in the London office to raise awareness of this importance issue and better enable staff to spot warning signs.

Training

The Firm understand that training is an essential tool in combatting modern slavery and is committed to ensuring that all staff remain vigilant and that those with procurement roles fulfil them responsibly. The Firm expect people to stay alert to slavery and trafficking indicators and their obligation to report concerns and reassurance that they can do so with confidence.

New joiners to the Firm are required to undertake the e-learning module and senior managers and those involved with procurement are kept abreast of any developments or changes in the legislation.

Measuring effectiveness

As a result of taking the above steps the Firm is appropriately placed to identify and address potential risks in our supply chains and will continue to actively monitor the position. To date no breaches of the modern slavery legislation have been reported to the Firm or come to its' attention.

Approval

This statement was approved on behalf of the Firm by the Management Board on 16 August 2023.

Signed:

Date:


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Jason Fox, London Managing Partner