MODERN SLAVERY ACT TRANSPARENCY STATEMENT

September 2023

This statement is made on behalf of Addleshaw Goddard LLP and AG Service Company Limited pursuant to section 54(1) of the UK's Modern Slavery Act 2015 (MSA).

Addleshaw Goddard is an international legal practice carried on by Addleshaw Goddard LLP and its affiliated undertakings. Details of the Addleshaw Goddard affiliated undertakings which offer legal services and the jurisdictions in which they operate are available on the Addleshaw Goddard website.

This statement relates to actions and activities during the financial year 1 May 2022 to 30 April 2023 and was approved by the Addleshaw Goddard LLP Board on 28th September 2023.

OUR COMMITMENT

- We are committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as contemplated by the MSA (**Modern Slavery**) in any part of our business or in our supply chain.
- We are committed to an open and honest working culture and welcome the transparency encouraged by the MSA.
- This statement sets out for the public, and for our clients, suppliers and employees, the steps that Addleshaw Goddard is taking in this regard across the whole group worldwide.

OUR POLICIES AND PROCEDURES

- Our commitment to Business with Integrity, which is publicly available on our website, clearly sets out our commitment to acting ethically in all our business relationships and the standards of integrity, ethical supply and social and environmental responsibility which we expect of our suppliers.
- Our Procurement Policy and Supplier Code of Conduct, which is publicly available on our website, sets out in detail our expectations with regard to supplier commercial practices. The Supplier Code of Conduct requires compliance with legislation, codes of conduct, professional regulation and best practice appropriate to the supplier's business. The policy includes obligations on suppliers to enable Addleshaw Goddard to comply with its obligations under the MSA and to help Addleshaw Goddard achieve its own commitments with regard to Modern Slavery.
- Our HR processes and pre-employment screening make sure that all our personnel, across all the jurisdictions in which we operate, have the appropriate rights to work and are engaged in accordance with local employment legislation.
- Our employees are protected by our Whistleblowing Policy which provides a framework for all employees to be confident in the knowledge that, if they consider it appropriate to raise a concern about another employee's behaviour or practices, which they reasonably believe to be illegal, dangerous or unethical, they can report this without fear of retribution, victimisation or detriment.

RISK ASSESSMENT AND MANAGEMENT

- The Office of the General Counsel, together with the Procurement and HR teams, undertakes an annual assessment of the risks of Modern Slavery in our business and supply chain and actions are agreed to mitigate any identified risks.
- The previous year's record of risks is reviewed as part of the assessment and the effectiveness of mitigating actions is evaluated. Current policies and procedures are reviewed and updated accordingly.

SUPPLY CHAIN DUE DILIGENCE

- The due diligence that we carry out on our suppliers includes requesting data which may indicate a risk of Modern Slavery, and the assessment of the data received from our suppliers to evaluate that risk. Our current process involves:
  - asking more specific questions and engaging openly with both potential and incumbent suppliers about practices which may suggest Modern Slavery;
  - repeating due diligence annually where a particular supplier or supply chain is designated as high risk for Modern Slavery (for all other suppliers, due diligence is undertaken as part of the contract renewal process); and
  - escalating any concerns regarding Modern Slavery within our business.
- As part of a larger procurement strategy and processes project which is currently underway, we are introducing a new due diligence platform which will support the development and implementation of smart due diligence and supplier risk scoring. This is expected to make our supply chain management more effective at identifying and eradicating Modern Slavery.

SUPPLIER OBLIGATIONS

- We look to incorporate our Procurement Policy and Supplier Code of Conduct into our contracts and all other engagements with third party suppliers, creating a contractual obligation to comply with its provisions.
- We look to incorporate reporting obligations and rights of audit into our contracts to ensure that we can monitor the supplier's compliance with key elements of the contract.
- Through our ongoing supplier management activities, we continue to emphasise the importance of transparency and compliance with the MSA and our willingness to work with suppliers on any issues identified. We encourage suppliers to approach us and engage in a constructive dialogue as a means of resolving any issues.

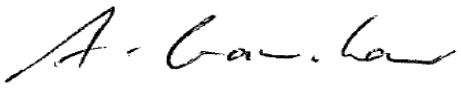
STAFF TRAINING

- Training on Modern Slavery is provided annually by the Office of the General Counsel to:
  - our Premises and Office Services Director for dissemination to our Office Managers in the non-UK offices;
  - the Procurement team for application to our supply chain management; and
  - the HR team for application to our recruitment processes and the handling of concerns raised by employees.
- Modern Slavery training is also included as part of induction training for new members of these teams.

REPORTING AND KEY PERFORMANCE INDICATORS

- Where instances or any potential risks of Modern Slavery are identified:
  - within our supply chain, this information would be escalated to the Head of Procurement; and
  - from within our employee / personnel pool, this information would be escalated to the Chief People Officer.
- To date, no instances of Modern Slavery have been identified within our business or supply chain.

SIGNED



ASTER CRAWSHAW
Senior Partner

PROBLEMS. POSSIBILITIES.
COMPLEXITY. CLARITY.
OBSTACLES. OPPORTUNITIES.
THE DIFFERENCE IS IMAGINATION.

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