Bristows

Slavery and Human Trafficking Statement

1. About Bristows LLP

- 1.1. Bristows LLP is a limited liability partnership registered in England under registration number: OC358808 and is authorised and regulated by the Solicitors Regulation Authority.
- 1.2. We provide legal services to international and UK clients. We have offices in London, Brussels and Dublin, but almost all of our personnel are based in the UK.

2. Risk Assessment

- 2.1. As a regulated firm that provides professional services, we consider that we are at low risk of slavery or human trafficking occurring within our own business.
- 2.2. However, we are committed to taking steps to ensure that it does not occur in any of our supply chains. Our key suppliers that are most likely to present a risk include those that provide support in delivering office-based business services, generally related to facilities management.

3. Slavery and Human Trafficking Policy

- 3.1. Our Slavery and Human Trafficking Policy is published on our intranet and applies to everyone who works for us.
- 3.2. Our Whistleblowing Policy is published on our intranet and ensures that anyone who works for us can raise any concerns about conduct or compliance confidentially (including concerns in relation to slavery and human trafficking) and be assured that these concerns will be dealt with appropriately.

4. Our Supply Chains

- 4.1. Our Slavery and Human Trafficking Policy sets out how we manage our supply chains and includes the requirements set out below.
- 4.2. As part of our processes for contracting with new suppliers and renewing contracts with existing suppliers, we must, where reasonably practicable and appropriate: i) include specific prohibitions in our contracts with our suppliers against slavery and human trafficking, including a right for us to terminate the arrangement if the supplier breaches its obligations under the Modern Slavery Act 2015; and ii) check that the supplier has an appropriate slavery and human trafficking policy in place and/or has published a current slavery and human trafficking statement if the supplier is required to do so by the Modern Slavery Act 2015.
- 4.3. We must terminate our relationship with a supplier if they or their contractors and suppliers tolerate slavery or human trafficking in any part of their business or supply chains.
- 4.4. The heads of our business services operations must be trained on our Slavery and Human Trafficking Policy and all of our personnel must be made aware of our Slavery and Human Trafficking Policy.
- 4.5. Our Head of Risk and Compliance must be consulted on certain supply chain contracts in accordance with our procurement policy.

5. Summary of Steps Undertaken During the Previous Year

- 5.1. Members of our Slavery and Human Trafficking Committee, which includes the heads of our business services operations, have considered the steps we have taken in the previous year and we have updated our Slavery and Human Trafficking Statement accordingly.
- 5.2. Our Slavery and Human Trafficking Policy is available to all of our personnel and our Slavery and Human Trafficking Committee has continued to monitor indicators of slavery or human trafficking in our supply chains.

Bristows

- 5.3. We have continued to make it compulsory for a targeted cross-section of our personnel to carry out training on slavery and human trafficking, including all of our personnel in teams who have responsibility for liaising with recruitment agencies and procuring goods and services.
- 5.4. We have introduced a new procurement workflow, which requires sign off from our Head of Risk and Compliance of certain supply chain contracts. We have submitted our Slavery and Human Trafficking Statements for publication on the UK government's Modern Slavery Registry.
- 5.5. We have endeavoured to incorporate contractual protections against slavery and human trafficking into any new contracts with existing and new suppliers, where reasonably practicable and are working towards a formal supplier code of conduct.
- 5.6. We have assessed the risk of encountering slavery and human trafficking when engaging new suppliers (and continued to monitor existing suppliers across our business) to identify those suppliers we considered to be most likely of being at risk of having slavery or human trafficking in their businesses or supply chains, and we have updated our Slavery and Human Trafficking Risk List accordingly.

6. Next Steps

- 6.1. The Slavery and Human Trafficking Committee will continue to monitor our supply chains to identify any risk of slavery and human trafficking and will review and update our Slavery and Human Trafficking Risk List.
- 6.2. Where we identify new suppliers as being at risk and such suppliers do not have slavery and human trafficking statements, we will continue to seek appropriate assurances from those suppliers that: i) there is no slavery or human trafficking in any part of their business; and ii) they are taking active steps to ensure that there is no slavery or human trafficking in any part of their supply chains.
- 6.3. We will continue to submit our Slavery and Human Trafficking Statements to the government's Modern Slavery Registry.
- 6.4. We will continue to endeavour to include contractual protections against slavery and human trafficking in any new contracts with existing and new suppliers.
- 6.5. We will continue to provide compulsory training to a targeted cross-section of our personnel on slavery and human trafficking, including all of our personnel in teams who have responsibility for liaising with recruitment agencies and procuring goods and services.
- 6.6. We will provide a notification to all of our personnel that we have updated our Slavery and Human Trafficking Statement, which will contain a reminder of where they can access our Slavery and Human Trafficking Policy.
- 6.7. We will continue to monitor government guidance and reports regarding the Modern Slavery Act 2015, particularly in relation to amendments to applicable legislation and additional government guidance, and consider updates to our internal procedures in the light of such amendments and information.

This is Bristows LLP's Slavery and Human Trafficking Statement for the financial year 2023/2024 and it was approved by the membership of Bristows LLP on 17 October 2024.

-Adf

Joint Managing Partner Bristows LLP 17 October 2024