

RESPONSIBLE BUSINESS

Modern Slavery statement 2024

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This statement is made pursuant to obligation under section 54 (1) of the Modern Slavery Act 2015 (the Act), for the financial year ending 30 April 2024.

Modern Slavery and Human Trafficking are human rights abuses and have no place in our business or in our supply chain. We are dedicated to running our business responsibly and committed to the highest standards of professionalism and integrity.

Introduction

This statement sets out the steps, risk management and mitigation measures, which Borges Salmon LLP, its subsidiaries and all affiliated entities (“we”, “us”, “our” or “the Firm”) have undertaken and will continue to take in our business and supply chains, in relation to the issue of slavery and human trafficking.

Our values and reputation are of huge importance to us. They are integral components of delivering exceptional service to our clients, as well as being an exceptional place to work for our people.

This is the ninth Borges Salmon Modern Slavery statement. We publish our statement on our company website: www.borges-salmon.com We file with the Government’s voluntary Modern Slavery Statement Registry: <https://modern-slavery-statement-registry.service.gov.uk/> and with The Transparency in Supply Chains Platform: <https://tiscreport.org/>.

Modern slavery and human trafficking occur for a variety of reasons, including poverty, lack of education, unstable social and political conditions and economic imbalances. The climate crisis and war are also exacerbating factors that can increase a person’s vulnerability to exploitation.

During recent years we have witnessed the continuing effects of the climate crisis, inflation, energy security issues and the pandemic, as well as people fleeing conflict and migrating for economic reasons. Consequently, there are

numerous risk factors relating to modern slavery and human trafficking.

In this context, we consider it vitally important to maintain high standards, engage with our suppliers, to be an active community partner, particularly in the areas of employability and inclusion and to progress our carbon targets.

Throughout 2024 we continued to progress our community outreach, with strands of work focused on inclusive employment and supporting refugees. We have a comprehensive community engagement programme encompassing 65 key partnerships with charities, Community Interest Companies and community-based organisations. Our community engagement portfolio provides support to address a range of issues including mental health and isolation, food security, homelessness, access to justice and climate action.

We continue to partner with anti-slavery and human trafficking charity Unseen, as we recognise the importance of addressing social and environmental issues that can lead to vulnerabilities and put people at risk of modern slavery and human trafficking. This year we have committed £3,000 to them in the Big Give Appeal to support the work they do assisting victims of modern slavery. In October Unseen hosted a firmwide Lunch & Learn session on modern slavery for our people.

In pursuit of inclusive employment, we work with a number of charities aligned to our priorities around social mobility, gender balance, LGBT+, race and disability inclusion. We work with these organisations to support disadvantaged groups and gain feedback to improve our employment practices.

During 2023 we gained Disability Confident Leader accreditation and in 2024 we retained the highest accreditation of 'Platinum' from Investors in People. Our award-winning Working with Schools Programme is focused around supporting disadvantaged and under-represented students.

We are active members of Business in the Community (BITC), with our Head of Responsible Business sitting on the South West Leadership Board. We collaborate with the Social Mobility Business Partnership (SMBP) and lead the South West Cluster of activity for this organisation. SMBP seeks to provide students from low-income backgrounds with better access to professional services' careers. These community and inclusion initiatives reflect our commitment to equality and opening up access to careers, which we believe in pursuing as one lever in the fight against modern slavery and human trafficking.

During the year, we maintained certification of ISO standards: ISO 9001 (quality management), ISO 14001 (environmental management), ISO 27001 (information security) and ISO 22301 (business continuity).

We participate in the EcoVadis sustainability assessment, and our 2023 submission scored 69% overall, with a 70% score in labour and human rights. This places us in the top 10% of companies assessed by EcoVadis, attaining their Silver Standard. The labour and human rights assessment through EcoVadis analyses our approach to policy, endorsements, measures, certification, coverage and reporting and we use the findings from this assessment each year to identify improvement areas and actions to take to further strengthen our approach.

We continue to advocate for the awareness and understanding of modern slavery within our Firm, our supply chain and the business sector.

As a supplier of professional legal services, we regularly disclose to our clients our position and practices addressing modern slavery and human trafficking.



Modern slavery and human trafficking

We understand modern slavery and human trafficking as defined in the Act, the UN Universal Declaration of Human Rights and the conventions of the International Labour Organization (ILO), particularly relating to forced or compulsory labour.

We recognise that forced labour is a form of slavery and includes debt bondage and the restriction of a person's freedom of movement, whether that be physical or non-physical.

According to the International Organization for Migration (IOM) Global Activity report 2022, new and ongoing conflicts, violence, persecution and human rights abuses have seen the number of people forcibly displaced reach over 120 million.

In September 2022 the ILO reported there are 50 million people in situations of modern slavery on any given day and an estimated 28 million are in forced labour, which includes over 16 million in the private sector including construction, manufacturing, mining, utilities, agriculture, forestry, fishing and domestic work.

In this context, we recognise that we, and other businesses, are exposed to the risk of modern slavery and human trafficking, in operations and supply chains.

Our business, organisational structure and supply chains

Burges Salmon is an ambitious, sustainable and inclusive firm that ensures its clients, people and wider communities flourish.

Our clients range from the largest private and public sector organisations and institutions, to entrepreneurial businesses and wealthy individuals and families.

Working from our offices in Bristol, London and Edinburgh, we have built a progressive service culture, based on collaboration and teamwork that is shaped around the needs of our clients. Operating in selected markets where our knowledge, experience and skills deliver highly effective solutions to our clients' complex needs, we aim to be a leader not a follower in these markets.

Burges Salmon works for clients in all three UK jurisdictions and across the globe, through an international network of leading independent law firms – our Preferred Firm Network. Our objective is to provide clients with excellent service and advice, working with these preferred firms around the world to meet clients' international needs, where relevant.

We have more than 1000 people, including in excess of 520 fee-earning lawyers and 110 partners (our most senior

lawyers who are owners of the Firm) who work in a hybrid way between our offices and their homes. The remainder of our people are business professionals who work in our operations, finance, people, marketing and client support teams. Burges Salmon has offices in Bristol, Edinburgh and London, as well as a presence in Dublin and Cardiff.

Burges Salmon LLP is a limited liability partnership. The Strategic Board is responsible for overall management of the Firm. Chaired by our Senior Partner, its primary responsibility is to set the strategic direction and ensure the effective governance of the Firm. It has oversight of a number of sub-committees, including the Executive Committee (ExeCom).

ExeCom is chaired by our Managing Partner and is responsible for the visible delivery of the Firm's strategy against agreed priorities. It has responsibility for overseeing the co-ordination and efficient operational delivery of the business services functions of the Firm, the effective delivery of projects and programme co-ordination, the effective management of operational business risks and, the operational delivery of the business services aspects of the Firm's policies.



Working from our offices in Bristol, London and Edinburgh, we have built a progressive service culture, based on collaboration and teamwork that is shaped around the needs of our clients.

In the operation of our business, we purchase a variety of goods and services, rent offices, purchase utilities and recruit people.

Our suppliers provide us with electronic equipment, office supplies, catering, security, information systems and computer applications, business travel and accommodation, banking services, telecommunications, professional services, cleaning services, document management, waste disposal, energy, office furniture and leased offices. We have received goods and services from 877 active suppliers during the past year.

As part of our people recruitment process, candidates are subject to pre-employment screening. This confirms their right to work, involves criminal background checks and verifies identity, experience and qualifications.

As a law firm, we conduct business under the strict governance of the **Solicitors Regulatory Authority** (SRA), the **Law Society of Scotland** and the **Law Society of Northern Ireland**. This requires that all our clients are subject to due diligence, to protect against money laundering, financing terrorism, bribery and corruption as well as conflicts of interest. During the year, we were instructed to advise on nearly 10,296 client matters and our client-base has 28 clients who are included in our Client Relationship Management programme and a further nine in our Key Account Programme.

Burges Salmon supply chain and business scope (FY 2023/24)

Supplies & inputs	Offices & people	Marketplace & community relationships
877 active suppliers	12,164 m² Bristol office	10,296 client matters
	870m² Edinburgh office	65+ key community collaborations
	1,084 m² London office	80+ jurisdictions in Preferred Firm Network
	220 new hires	98% Modern Slavery e-learning completion rate
	1,100 people	95% Suppliers paid within 60 days
	524 fee earners (excluding Partners)	
	110 Partners	

Policies and conduct

At Burges Salmon our **six core values** are: ambition, collaboration, commitment, fairness, quality and respect. They underpin everything we do.

As the Firm is regulated, our people are required to conduct themselves to specific standards including the **SRA Principles and Codes of Conduct** and under the regulatory regime of the **Law Society of Scotland**.

We pride ourselves on being a responsible business and are signatories to the **Ten Principles of the UN Global Compact** for responsible business. This requires us to report on our commitment and progress in the areas of human rights, labour practices, anti-bribery and corruption and, the environment.

Our **Human Rights Policy** aims to avoid causing or contributing to human rights impacts through our own activities, uphold the respect of human rights in direct relation to our operations and business relationships and, support the promotion of human rights within our operations and sphere of influence.

Our Human Rights Policy applies to all our people, including contractors and temporary workers. We expect our suppliers to respect and adhere to this policy as part of our **Purchase Terms and Conditions**, our contracting principles and our approach to supplier due diligence.

We have a number of other policies, which are relevant to the operation of our Firm and address modern slavery and human trafficking risks, which include:

- Anti-Bribery and Corruption Policy
- Responsible Procurement Policy
- Health and Safety Policy
- Whistleblowing Policy

Expectations for behaviour are communicated to our people as part of their induction to the Firm as well as through on-going training, via a compliance and e-learning management system.

Our **Risk and Best Practice** team supports the Firm's compliance with the governing regulatory authorities and conducts a range of internal audits, in the pursuit of risk mitigation and continuous improvement.

We have a **Whistleblowing Policy and a Grievance Procedure** to enable our people to report any issues which they may encounter at work.

We provide a confidential **Employee Assistance Programme**, administered through an external provider, enabling our people to speak to trained personnel about any concerns they may have. This is available to our people 24 hours a day, 365 days a year.

WE SUPPORT



We pride ourselves on being a responsible business and are signatories to the **Ten Principles of the UN Global Compact for responsible business.**

Due diligence and risk assessment

As a professional services firm which operates under strict governance criteria and regulation, the general assessment is that we are at low risk of slavery and human trafficking occurring within our own operations.

We recognise there are greater risks of slavery and human trafficking occurring within our supply chains. We understand there are more prominent risks of slavery where workers are in lower skilled employment, away from home and working in temporary positions. We further recognise there is greater risk in certain geographies and sectors.

In terms of **supply chain risk assessment** we have determined our key suppliers to be those businesses which supply us with goods and services that are significantly important to the delivery of our legal services. We have included additional suppliers that we have identified as higher risk based on our risk criteria. Our risk assessment includes considering information on the level of spend, whether the supplier has low skilled and / or low paid employees, whether the services or products provided are in an industry sector considered to be at a greater risk of modern slavery, purchase ratio of high volume to low-cost products, country risk for suppliers' operations and / or supply chain and any known modern slavery allegations or breaches.

In relation to modern slavery and human trafficking risks, we have primarily focused on those suppliers we have identified as **key and potentially higher-risk**, based on the criteria laid out above. 19 suppliers were identified of particular interest from a modern slavery due diligence perspective. Following identification we analysed and scored these suppliers based on responses to our Supplier Assurance questions on Modern Slavery. The result of this process is that all 19 suppliers are deemed to have sufficient approaches in place to mitigate modern slavery and human trafficking risk and so currently we can continue working with them.

We tend to foster long-term relationships with our key suppliers, ensuring they meet our supplier management practices. These include the expectation for our suppliers to implement due diligence procedures with their suppliers, sub-contractors and other participants in the supply chain. In 2025 it is our intention to issue a Supplier Code of Conduct to all new and existing suppliers to Burges Salmon which will include our expectation for suppliers to identify and mitigate any risks of human trafficking and modern slavery within their supply chain.

Our **supplier management practices** include a Responsible Procurement Policy; Standardised Purchase Terms and Conditions; Contracting Principles for our Suppliers; financial controls for invoice payment; New Approved Supplier form (requiring supplier alignment on the key issues of anti-bribery & corruption, modern slavery, confidentiality, data protections, information security and tax evasion); risk screening of business services suppliers; Business Services Supplier Log; supplier engagement events; a quarterly supplier performance review of key suppliers; standardised agenda for supplier meetings with supplier relationship managers; a targeted annual supplier assurance questionnaire; as well as regular meetings with key suppliers. Our supplier management practices are monitored and audited as part of our **Quality Management System**.

Our Knowledge and Information Services team use a **tracker service** to monitor news and potential allegations regarding our suppliers.



In terms of **supply chain risk assessment** we have determined our key suppliers to be those businesses which supply us with goods and services that are significantly important to the delivery of our legal services.

We engage with our suppliers to assert our expectations. We expect our suppliers to:

- Confirm their commitment to no slavery or human trafficking
- Apply corresponding values within their own organisation
- Demonstrate commitment to achieving responsible business practices

We monitor and review our suppliers and consider any issues arising in our supplier performance through our regular account meetings. Any supplier in our supply chain which is found to be non-compliant in terms of our standards will be reviewed and may be subject to a range of sanctions, including termination of contract.

We undertook a **desk-based human rights review** during 2019, following the UN Guiding Principles on Business and Human Rights, to help us assess our respect of human rights, in the context of the Firm's operations and in terms of the four stakeholder groups (our clients, people, suppliers and communities). We deemed this

important given the wider context of preventing modern slavery through the general respect of human rights.

In addition to the 'Right to be free from slavery and forced labour' we identified the following human rights as most pertinent to the Firm:

- Right to life (safeguarding health, wellbeing and the environment)
- Right to privacy (management of confidential and personal data)
- Right to non-discrimination (equal opportunities and fair treatment for all)
- Right to an adequate standard of living (living wage, Fair financial transactions and economic contributions) Right to education (no child labour, social mobility, training and development)

These are key considerations in the delivery of our commitments as a responsible business and as signatories to the UN Global Compact.



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Modern Slavery training and awareness

We recognise the need for everyone at the Firm to have a basic understanding and level of awareness of modern slavery. This year we refreshed our **Modern Slavery e-learning course** which is mandatory for everyone at the firm to complete. This is now provided to our people through supplier Learner Bubble in addition to our compliance module 'Preventing Exploitation'. We utilise our **internal communication channels** to give relevant updates on modern slavery and human trafficking and to maintain visibility of the issues, collaborating with the not-for-profit anti-slavery and human trafficking charity 'Unseen'. In October this year, in line with Anti-Slavery Day, Unseen hosted a firmwide **Lunch & Learn** session to raise awareness about the prevalence of modern slavery in the UK today. The session discussed the signs to recognise if someone is a victim of modern slavery and how people can report any incidents they may come across.

Given our understanding of risk we periodically provide more in-depth training for people in specific roles, including the people team, risk and best practice team, supplier relationship managers and procurement team. This training involves a combination of an **additional e-learning and compliance module** 'Practical Steps for Procurement' and a **facilitated workshop**. The workshop is designed to enable discussion, consideration of risk in the operational context of the Firm and to deepen understanding of how modern slavery manifests in the UK and global supply chains. Unseen provides this training in-house and 23 of our people attended training sessions in March 2023.



Our responsible business team

Members of our Responsible Business team maintain their knowledge of the issues and track latest developments through participation in relevant training, events and conferences.

Collaborations

Given the challenges of effectively addressing modern slavery and human trafficking issues, we recognise the importance of collaborating with other organisations to share and advocate good practice.



Unseen is a not-for-profit organisation working towards a world without slavery. They provide victim support and rehabilitation, a helpline, partnership resources, advocacy and awareness raising.

Since this collaboration was established in 2018, we have contributed to Unseen with financial donations and in-kind support and enabled the advocacy of their work with representatives from other businesses, civil society and the community. They deliver training to our people, support us with communication and awareness campaigns and gave feedback to our Board on our Modern Slavery statement 2018.



The Living Wage Foundation is a campaigning organisation in the UK, which aims to persuade employers to pay a Living Wage.

We are an accredited Living Wage Foundation employer. This means we are committed to paying all of our people at least the living wage. This includes people on temporary contracts and workers at our premises, who are contracted through our suppliers. This is particularly relevant in terms of security, catering and cleaning people.



Fairtrade is a global movement with a strong and active presence in the UK, represented by the Fairtrade Foundation. They work to connect disadvantaged farmers and workers with consumers, promote fairer trading conditions and empower farmers and workers to combat poverty and support sustainability.

We have been a supporter of the Fairtrade Network South West since 2011 to increase awareness of Fairtrade produce and merchandise. We mark the anniversary of Fairtrade Fortnight with awareness raising and internal events and work with our catering supplier to promote the take up of Fairtrade products.



The Prince's
Responsible
Business Network

Business in the Community is a membership organisation for businesses that have a commitment to responsible business and wish to be part of a network of like-minded organisations.

As a member of BITC, we participate in their Responsible Business Tracker benchmarking tool, which helps us to take a continuous improvement approach to all aspects of responsible business, including human rights and supply chain management.

We draw on BITC resources and insights from other businesses, as part of this responsible business network. We are members of the BITC South West Leadership Board.

Effectiveness and performance

We review our policies and procedures to ensure they remain effective and to identify opportunities to enhance and strengthen our approach. This includes discussion within our Risk Committee, ExeCom and the Strategic Board.

2023 Commitment	Progress
Review and enhance concern reporting processes and associated policies for example our Whistleblowing process.	In progress.
Participate in relevant benchmarks and assessments and action improvements highlighted, particularly in relation to supply chain management and labour practices.	Complete. Achieved through Ecovadis assessment including Supply Chain and Human Rights disclosures.
Drive engagement with Modern Slavery e-learning within the Firm, with internal communications and targeted reminders, to achieve above 95% completion rate.	Complete. Update and promotion of mandatory firmwide e-learning resulting in 98% completion rate.
Continue to support and advocate for the work of Unseen.	Complete. Donated £3,000 to Unseen through their Big Give Appeal and collaborated on a Modern Slavery Lunch & Learn rolled out firmwide.
Work with newly appointed Procurement Manager on ESG requirements and objectives related to modern slavery.	In progress.

Key performance indicator	FY2023/24	Comments
Modern Slavery e-learning completion rate	98%	Mandatory training for all of our people
EcoVadis Score for Labour Practices and Human Rights	70	Higher than the legal and accounting industry average score of 58
Suppliers paid within 60 days	95%	Achieved target to pay 95% of suppliers within 60 days by 2026

Commitments

During FY 2024/25, we plan to deliver upon the following commitments to continuous action and improvement:



Have our approach to modern slavery assessed by an independent third party specialist to ensure the firm continues to identify opportunities and any gaps to deliver and minimise risk



Achieve at least a 95% completion rate for Modern Slavery e-learning within the firm



Participate in relevant benchmarks and assessments and action improvements highlighted, particularly in relation to supply chain management and labour practices



Continue to raise awareness and advocate for the work on Unseen particularly noting the opportunity provided with the annual Anti-slavery day



The Prince's Responsible Business Network

Champion inclusive employment through key community partnerships and through our membership with Business in the Community



Approval

This statement has been approved by the Strategic Board of Burges Salmon LLP on 20 November 2024.

Roger Bull
Managing Partner

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We invest in people Platinum



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