Charles Russell Speechlys

Modern Slavery Statement for our financial year ending 30 April 2026

The United Kingdom Modern Slavery Act 2015 ("**MSA**") requires certain businesses to provide disclosure concerning their efforts to ensure there is no modern slavery or human trafficking in their organisation or supply chain.

The following is the statutory statement by Charles Russell Speechlys LLP made pursuant to section 54 of the MSA and constitutes our slavery and human trafficking statement for the financial year ending 30 April 2026.

This statement is published on behalf of Charles Russell Speechlys LLP. In this statement, references to "we", "us", "our" or the "firm" are references to Charles Russell Speechlys LLP and each of its subsidiaries.

This statement has been approved by the Operational Committee of the firm.

Statement

We are committed to running our business responsibly and work hard to generate value for our people and communities and to safeguard our natural environment.

We take seriously our legal and regulatory obligations in all our business conduct and strive to observe these fully in our recruitment policies, vendor selection and supply chain management. These include our duties under the MSA.

Our business

We are an international law firm that provides advice to a range of UK and international clients across a number of different specialisms.

We have offices in the UK (London, Guildford and Cheltenham), Europe (Paris, Luxembourg, Geneva, Zurich, Zug and Milan), the Middle East (Qatar, Dubai and Bahrain), Asia (Hong Kong and Singapore) and the US (Connecticut and New York). Further details on the Charles Russell Speechlys structure can be found on our website.

Together, our Procurement team, Human Resources team and General Counsel's Office, take responsibility for managing the risk of Modern Slavery in our operations and supply chain. Our objectives in this area are underpinned by our Responsible Business Strategy. Ultimately, it is the Operational Committee, chaired by our Managing Partner, that is accountable for senior level oversight of modern slavery risk.

Our supply chain

Our supply chain comprises the types of supplier to be expected for a professional services firm of our size and scale. Our suppliers are primarily providers of professional services, premises and related facilities management services, utilities, catering services and IT equipment and related IT services.

Our supply chain is reflective of our footprint with 77% of our expenditure concentrated with UK-based suppliers, reflecting the larger size of our UK office footprint and the location of business services functions there. The remainder of expenditure is with suppliers based in

Europe (13%), Asia Pacific (5%), the Middle East (3%) and North America (2%), broadly in line with our international footprint.

We engage in a range of supplier arrangements, structured as either short-term or longer-term agreements depending on operational requirements. These agreements are implemented by our centralised Procurement team and General Counsel's Office and are managed day-to-day by individuals within our Business Services Division.

Risk assessment

We have considered in detail the nature of our operations and supply chain. Given the nature of our business and the level of control we have over our operations, we consider that our material modern slavery risk exposure relates to our supply chain.

Our Procurement team carry out an overall assessment of our global supply chain on an annual basis. This is conducted by mapping the locations of our suppliers against the vulnerability score given by the Global Slavery Index. This assessment is used to assist prioritisation of risks with specific suppliers and supply chains.

Together with location risk, we have identified the highest risk areas of our supply chain as being the purchase of goods and services in sectors where a large proportion of workers is paid the minimum wage. These include services relating to facilities management, travel and hospitality, as well as the purchase of products such as branded clothing and stationery.

We seek to mitigate any enhanced risks of modern slavery in our supply chain based on location and/or sector by:

- Conducting a procurement process for key contracts with suppliers;
- Placing an emphasis on value rather than price alone in our procurement decisions; and
- Ensuring staff involved in the procurement of goods and services and the management of suppliers receive appropriate training about risks relating to modern slavery and human trafficking.

Risk Mitigation

Details of checks and due diligence conducted on members of the supply chain

We require suppliers to disclose information to us about their business practices, to assess whether there is a risk of modern slavery or human trafficking in their organisation or supply chain. Where requested, suppliers are required to disclose their anti-slavery policies and practices through part of a due diligence process via our firm's procurement portal. Where responses indicate a heightened risk has been identified this may disqualify a prospective supplier from being awarded contracts and in the case of incumbent suppliers may result in further review and audits.

We use a third-party risk intelligence tool to identify and monitor various risks including legal action related to modern slavery, human trafficking and bribery and corruption. This allows us to assess new suppliers and monitor existing suppliers on an on-going basis.

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Our standard supplier contract terms require suppliers to confirm that they comply with their obligations under the Modern Slavery Act 2015.

Employment

We are committed to ensuring that everyone working for us has freely chosen their employment and is treated with dignity. We pay all our UK staff the living wage, as a minimum, and ensure that interns receive fair compensation.

Training

We periodically make training on slavery and human trafficking available to staff. This is targeted primarily at our HR, procurement and facilities management teams who are at the greatest risk of encountering modern slavery or human trafficking in their day-to-day functions.

The level of training provided is proportionate to the role of the employee concerned and the likelihood of their becoming exposed to instances of modern slavery or human trafficking in carrying out their everyday duties.

Violations

Violations by suppliers

We take very seriously any instance of suppliers being involved directly or indirectly in modern slavery or human trafficking. Our response to any such discovery will depend upon a number of factors, including the number of victims involved, the gravity of the human rights violations concerned, whether the supplier was involved directly or indirectly, whether or not the supplier has previously been involved in such conduct and the potential impact to the victims of modern slavery or human trafficking.

Violations by employees

We maintain a zero-tolerance stance towards any involvement by our Partners or employees in modern slavery or human trafficking. Individuals found to be engaged in such activities will face serious disciplinary action in line with the firm's disciplinary policies and procedures.

Policies

We have a set of policies that clarify and communicate our approach to the identification of modern slavery risks and the steps that we take to prevent modern slavery and human trafficking in our operations and supply chain. These include:

- **Modern Slavery and Human Rights Policy:** which details our firm-wide approach to human rights and modern slavery and our responsibility to conduct our activities ethically and with integrity, and to ensure that we do not cause, contribute to, or become directly linked to adverse human rights impacts through our operations, our relationships, or our supply chain.
- **Supplier Code of Conduct:** Our suppliers must adhere to our Supplier Code of Conduct which includes requirements on Modern Slavery, Child Labour and Physical Abuse risks.

- **Procurement Policy:** which details our approach towards procuring goods and services and ensures that our Procurement team has visibility over procurement activities.
- **Whistleblowing Policy:** which details the procedure for staff raising concerns about wrongdoing in the workplace and provides a framework for dealing with those concerns. Concerns may include issues relating to compliance with our policies, practices within the business or our supply chain.
- **Diversity, Equity and Inclusion Policy:** which sets out the firm's commitment to fostering a diverse, equitable and inclusive workplace where everyone feels valued, respected and able to fulfil their potential. It explains our approach to equality of opportunity, inclusive culture and the behaviours we expect to support an environment of belonging and mutual respect.
- **Dignity at Work (Anti-Bullying and Harassment) Policy:** which sets out the standards of behaviour expected across the firm and the steps we take to maintain a working environment free from bullying, harassment and victimisation. It explains what constitutes unacceptable behaviour, how concerns can be raised and how complaints will be addressed.

These policies are published internally and also referenced in our internal modern slavery training. Policies applicable to suppliers are shared with them during the due diligence stage of our Procurement process.

Effectiveness of policies and processes

We keep our modern slavery and human trafficking policies and due diligence processes under regular review to ensure their effectiveness. We have not, to date, identified any instances or serious risks of modern slavery in our own operations, in connection with our direct suppliers, or in our wider supply chain. We continue to monitor this on an ongoing basis.

We review the following measures when assessing whether our policies and procedures are operating effectively:

- Whether we have received reports of suppliers being involved in modern slavery or human trafficking activity.
- Whether the assessment process has raised grounds for concern regarding modern slavery or human trafficking.
- Whether assessments have been completed on a significant proportion of our suppliers within the relevant financial year. We are currently working to increase this proportion.
- Whether relevant training has been delivered for all key procurement and supply management personnel.
- Whether there have been any reports or incidents of modern slavery in our own operations.

Continuous Improvement

In the past year we have:

- Continued our focus on Modern Slavery risk identification within our supply chain and conducted further targeted due diligence.
- Developed a specific policy that covers our approach and process to Human Rights and Modern Slavery.
- Embedded our approach to Modern Slavery within our Responsible Business Strategy.

Priorities for the year ahead

In the financial year ending 30 April 2027 our planned initiatives include:

- **Risk Assessment:** We will continue to assess and monitor modern slavery risks in our own operations and within our supply chain following a risk-based approach.
- **Targeted Due Diligence:** We will continue to conduct additional due diligence on those suppliers in locations with a heightened risk of modern slavery.
- **Training:** We will further roll out an eLearning module for relevant individuals to complete as necessary and proportionate based on their role.

SIGNED by SIMON RIDPATH for and on behalf of CHARLES RUSSELL SPEECHLYS LLP