

## **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 Dubai and affiliated offices in Paris.

### **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.

To assess the commitment of our supply chain with anti-modern slavery and human trafficking compliance, as part of our procurement process, we require all new vendors to confirm their commitment to anti-modern slavery and human trafficking and their compliance with relevant legislation. Failure to confirm will result in a vendor being deselected from our procurement process.

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:

- Undertaken a further review of our new vendor form. The form requires all vendors to confirm compliance with modern slavery and anti-human trafficking laws in the jurisdictions in which it operates and to provide copies of the relevant policy or, in the case of vendors supplying services to Bracewell (UK) LLP who are not required to comply with s.54 of the Modern Slavery Act, to positively confirm compliance with the Bracewell Supplier's Code on anti-

modern slavery.

- Delivered online training via VinciWorks: Modern Slavery: Preventing Exploitation, A Guide for Law Firms to partners and managers involved in procurement, who have joined the firm since the training was last delivered. The training provides an understanding of the Modern Slavery Act and ensures that staff are able to identify slavery in the supply chain.
- Circulated the Modern Slavery statement to all London Partners and employees as mandatory reading.

### **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, where relevant, 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 is approved on behalf of the Firm by the Managing Partner.

Signed:

Date:

  
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7/10/24  
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Jason Fox, London Managing Partner