

BRACEWELL

MODERN SLAVERY STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015.

Bracewell(UK) LLP (the "Firm") is committed to ensuring that we act ethically and with integrity in relation to combatting modern slavery and human trafficking in our business and supply chain.

Organisation structure

The Firm is a limited liability partnership registered under the laws of the State of New York, USA. The Firm 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. New vendors complete a "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.

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.

The Firm also has an Anti-Bribery and Corruption policy, Anti-Facilitation of Tax Evasion and Anti-Fraud Policy, Employee Handbook and Compliance Manual, which are all relevant to combatting slavery. These are all kept under regular review.

Supply chains

It is important for the Firm to have oversight of its supply chain, so that it can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

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.

We maintain records of direct suppliers, as described above, and where possible indirect suppliers (e.g. subcontractors). The Firm acknowledges that it is not always able to identify indirect suppliers.

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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.

Training and awareness raising

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 expects people to stay alert to slavery and trafficking indicators and to understand their obligation to report concerns and reassurance that they can do so with confidence.

Partners and staff involved in procurement are required to undertake training via the Firm's e-learning provider. The training provides an understanding of the Modern Slavery Act and ensures that staff are able to identify slavery in the supply chain. Partners, senior managers and any other staff involved with procurement are kept abreast of any developments or changes in the legislation.

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:

- Reviewed the UK Home Office Transparency in Supply Chains Statutory Guidance, published March 2025, and considered its application to the Firm's anti-slavery policy.
- Continued to keep procurement processes under review and engaged with new suppliers.
- Undertaken reviews of relevant policies and re-circulated the Anti-Bribery and Corruption Policy to partners and staff.
- Circulated the current Modern Slavery statement to all London Partners and employees as mandatory reading.

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 made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Firm's slavery and human trafficking statement for the current year. This statement is approved on behalf of the Firm by the Managing Partner.

Signed: 

Jason Fox, London Managing Partner

Date: 3/12/2025