

## MODERN SLAVERY STATEMENT – 2018/19

This statement is made on behalf of Burness Paull LLP (“**Burness Paull**”) pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “**Act**”). It has been approved by the Operations Board on 31 March and is signed by our Managing Partner, Tamar Tammes.

The purpose of this statement is to set out the steps that we as a firm have taken to ensure that slavery and human trafficking are not occurring in our business or in our supply chain. In accordance with our culture of continuous improvement and development, we also set out the steps that we plan to take in the forthcoming financial year to improve upon and enhance our policies and procedures in this area.

### OUR APPROACH

Burness Paull is a limited liability partnership registered in Scotland (SO300380) with 68 partners and over 530 employees. It provides corporate legal services globally and is regulated by the Law Society of Scotland. Adhering to the highest ethical and professional standards is one of our guiding principles. We are committed to preventing slavery or human trafficking in any aspect of our business or supply chain. We have undertaken an assessment of the risks of slavery or human trafficking and reviewed our existing business policies and procedures to ensure that the preventive measures are appropriate and proportionate to the level of risk.

### OUR SUPPLY CHAIN

As a law firm, we have a relatively simple supply chain, the purpose of which is to support our legal practice and internal office and technology functions.

Our supply chain can broadly be broken into the following key categories:

- **Business Services:** including catering, cleaning and travel services and outsourced document production and business process services.
- **Professional Services:** including services provided by auditors, advisors (for example in relation to tax and insurance), consultants and other specialists.
- **Real Estate:** including leases for our offices, services provided by security providers and contractors engaged in relation to fit-out works etc. and the purchase of office furniture and equipment.
- **Human Resources:** including services in relation to recruitment and payroll.
- **Technology:** including services provided in relation to our technology, software and equipment.

### OUR POLICIES

#### Relating to our staff

- **Recruitment & Selection Policy:** We apply the highest possible standards in the recruitment and employment of our people. We conduct due diligence on our prospective employees prior

to them joining Burness Paull. When recruiting, we comply with all employment legislation and any applicable regulations.

All of our staff are expected to comply with relevant laws and professional codes of conduct, as well as Burness Paull's internal policies and procedures.

- **Health & Safety Policy:** Burness Paull is dedicated to providing a healthy and safe working environment for all of its partners, employees and contractors working on site, as more fully detailed in our Health & Safety Policy.
- **Respect & Dignity and Diversity & Inclusion Policies:** Burness Paull takes a rigorous approach to preventing the occurrence of discrimination, harassment, bullying or victimisation at work and actively.
- **Fair Reward Policies:** Burness Paull is an accredited living wage employer and is committed to fair reward through its policies on salary, bonus and benefits schemes.

#### **Relating to our supply chain:**

- **Risk assess:** We assess risk related to human trafficking and forced labour associated with our suppliers. This assessment is based upon geography, the product or services being purchased, supplier quality performance and the nature of the business transaction.
- **Due diligence:** We carry out due diligence on all relevant and appropriate suppliers, and where appropriate, ask for information on their policies on fair sourcing of goods and services, and employment practices.
- **Code of Business:** We follow a Code of Business and expect all of our key business partners and suppliers to adhere to similar commitments and to maintain the highest standards of professionalism, ethics and integrity. This relates to various matters including human trafficking, slavery, ethical behaviour, anti-bribery and corruption.

#### **OUR FUTURE IMPROVEMENTS**

- **Training:** We are rolling out a programme of training on modern slavery and human trafficking which will be available to all staff. It will be mandatory for those involved in human resources and procurement.
- **Supplier contracts:** We will seek to impose contractual terms on all our suppliers asking them to:
  - (i) warrant that they and their suppliers comply with all applicable laws, statutes, regulations and codes relating to labour, anti-slavery and human trafficking laws, including but not limited to the Act; and
  - (ii) ensure that any person associated with the supplier in performing the goods or services in connection with the agreement, does so only the basis of a written contract which imposes on the third party the obligations to comply anti-slavery and human trafficking laws.

The right to audit will also be included in all supplier contracts, where relevant and appropriate. We will audit our suppliers from time to time to ensure that this is the case.

- **Engagement with third party professionals:** We are improving our pro-forma letters of engagement for instructing a third party professional, such as an expert or a foreign lawyer. In these letters, we will ask the third party professional to warrant that they comply with labour, anti-slavery and human trafficking laws, including but not limited to the UK Modern Slavery Act 2015, and that any subcontractor used by the third party professional in relation to the engagement does likewise.

Approved, and signed by



Tamar Tammes

Managing Partner