

MODERN SLAVERY STATEMENT – 2022/2023

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 7 December 2022 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. We genuinely care about who we work with and want to understand our suppliers’ values, including in relation to modern slavery.

OUR APPROACH

Burness Paull is a limited liability partnership registered in Scotland (SO300380) with 86 partners and 548 employees. We provide corporate legal services globally and are regulated by the Law Society of Scotland and the Solicitors Regulation Authority. 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 and human trafficking and reviewed our business policies and procedures to ensure that the preventive measures we take are appropriate and proportionate to our level of risk. In line with our commitment to the UN Global Compact goals we have zero tolerance in respect of violations of labour law or human rights.

We are confident in our internal policies; 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. Burness Paull is an accredited living wage employer and we are committed to fair reward through our policies on salary, bonus and benefits scheme.

OUR SUPPLY CHAIN

The United Kingdom has developed a culture of ethical business practice and strong labour regulation. Our suppliers are mainly based within the UK. As a law firm, we have a relatively simple supply chain, the purpose of which is to support our legal practice and internal office, including our technology functions. We have assessed the overall risk for Burness Paull contracting with organisations that engage in slavery or human trafficking as being relatively low.

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

- **Business Services:** including catering, cleaning, 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 WORK TO DATE

Within the last 12 months we have:

- Strengthened our internal operations by appointing a Contracts Manager, fully dedicated to our supply chain process.
- Reviewed our modern slavery risk mapping across our supply chain, ensuring that any suppliers or supply chains which are assessed as being potentially higher risk for Modern Slavery are identified.
- Engaged with our suppliers to get them to sign up to our Supplier Code of Business or provide evidence of an equivalent standard of compliance in their own codes and policies. Our Supplier Code of Business is available on our website and is a statement of the values and principals which are important to us and with which we expect our suppliers to comply. It covers matters including anti-bribery and corruption, human trafficking, slavery and ethical behaviour.
- Carried our additional due diligence on suppliers that we have identified as being potentially higher risk for Modern Slavery and we have gathered further data on their wider ESG commitments.
- Imposed contractual terms on relevant suppliers, as appropriate, asking them to warrant that they and their suppliers are in full compliance with our Supplier Code of Business and all applicable modern slavery, anti-human trafficking and labour laws.
- Rolled out further internal ESG training, to continue to raise employee awareness on modern slavery and human trafficking. Training on modern slavery is mandatory for those involved in the procurement of goods and services across the firm.

OUR FUTURE IMPROVEMENTS

In the next 12 months, in order to further reduce the risk of modern slavery and human trafficking in our supply chain, we are committed to

- Continuing to engage with suppliers at the point of onboarding/contract renewal to ensure that, where appropriate, contractual terms are in place providing a warranty that both they and

their suppliers are in full compliance with our Supplier Code of Business and all applicable modern slavery, anti-human trafficking and labour laws.

- Carrying out a full review of the enhanced risk assessment approach we currently apply to top-spend suppliers and extending this to other categories of suppliers regardless of their spend.
- Including modern slavery risks as part of our comprehensive Sustainable Procurement training for colleagues who deal with procurement, in line with our ESG commitments. This will include tailored guidance to help identify the potential risk areas for modern slavery and will provide information on the appropriate controls which can be used to mitigate the risk in our supply chain. It will also re-emphasise the importance of escalating any concerns around modern slavery.
- Continuing to demonstrate through strong leadership, training and ongoing communications our commitment to operating a responsible business which acts ethically and with integrity, which includes taking a zero-tolerance approach to modern slavery.

Approved, and signed by



Tamar Tammes
Managing Partner