

Modern Slavery Statement

2025/2026

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”).

OUR FIRM

Burness Paull is a limited liability partnership registered in Scotland (SO300380) with 95 partners and over 602 employees, spread across our three offices in Edinburgh, Glasgow and Aberdeen. We are a full-service, independent law firm working with leading organisations across the UK and internationally. We are regulated by the Law Society of Scotland and the Solicitors Regulation Authority in England and Wales. As a law firm, we always work to the highest professional standards and ensure compliance with the laws, regulations and best practice relevant to our business.

OUR APPROACH

We are committed to ensuring that modern slavery or any abuse of human rights has no place in our firm or supply chain. The purpose of this statement is to reinforce our commitment to the protection of human rights within our operations during the latest reporting period. From the period 2023-24, our financial year end has changed from 31 July to 31 March in keeping with standard practice for the legal services industry. This resulted in a shortened eight-month reporting period for 2023-24, notwithstanding which we entered the 2024-25 period having remained on course for the implementation of planned actions for the previous year. This statement sets out the steps we have taken during the period 2024-25 as well as our plans for the coming months to effectively manage the risk of slavery and human trafficking in our business and supply chain.

We believe in the importance of developing a culture of zero tolerance of forced labour, human trafficking, or any human rights abuse. We do so through our good business practices and policies, including being a [Living Wage Employer](#).

We have chosen to be a member of and endorse the [UN Global Compact](#) and be an advocate of its goals as the focus of our ESG strategy and commitments. This includes governance related goals where the UN focus is on anti-corruption, peace and the rule of law. This has provided us with a meaningful focus and framework to bring together many of our existing initiatives and it has also given us an opportunity and the ability to consider areas for improvement. ESG considerations are central to decision-making across the business.

OUR SUPPLY CHAIN

As a law firm, we have a relatively simple supply chain, which supports our legal practice and internal operations. As our primary operations are in the United Kingdom, we are compliant with the higher standard of ethical business practice and strong labour regulation within the country. Our suppliers are also mainly based within the UK. The firm's relationship with its suppliers is now overseen by our newly appointed Chief Operating Officer, Noel Jordan, (who commenced this role on 9 June 2025) and our Operations Board. Noel is the firm's first COO and will have overall responsibility for our business services and legal operations functions, including supply chain management. We also have a team that supports management of our supply chain on an operational level, including our Head of Sustainability and a dedicated Information Security Manager. They work closely with those in the business that are responsible for procurement.

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

- **Business Services:** including catering, cleaning, travel services and 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.
- **Facilities:** 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, training, payroll and employee benefits and insurances.
- **Technology:** including services provided in relation to our systems, software, and equipment.

Based on the type of supplier and the nature of the goods and services we purchase, together with our supplier due diligence processes and reviews, we have assessed the overall risk for Burness Paull contracting with organisations that engage in slavery, forced labour or human trafficking, and consider this to be relatively low.

OUR POLICIES AND DUE DILIGENCE PROCESS

As a signatory to the United Nations Global Compact, we are strongly committed to preventing slavery or human trafficking in any aspect of our business or supply chain. We are confident in our internal policies; we apply the highest possible standards in the recruitment and employment of our people. We also 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, bonuses, and benefits scheme. This contributes to our assessment of the overall risk of Modern Slavery existing within our own business being low.

In relation to our supply chain, we undertake a regular review of our business policies and procedures to ensure that the preventive measures we take are appropriate and proportionate to the level of risk our suppliers may pose for our organisation.

For the current reporting period, our main activities in relation to our supplier chain were largely in line with our commitments last year and involved:

- Engaging with suppliers at the point of onboarding/contract renewal to ensure that appropriate terms are in place to cover compliance with all applicable modern slavery, anti-human trafficking and labour laws. We continue to request that new and existing suppliers sign up to our [Supplier Code of Business](#) or have in place their own materially equivalent code that mirrors the same minimum level of compliance.
- Trialling a new tool for enterprise risk and supplier management with a view to improving upon our processes via automation and contributing to our ESG compliance programme. Whilst we ultimately opted not to proceed with a roll out of the tool on various operational grounds, the exercise prompted a full review and update of our enterprise risk management recording. We have also reviewed and upgraded our supplier onboarding and management processes.
- Continuing our annual training programme for colleagues who deal with procurement, focusing on raising awareness around sustainable procurement practices which are also in

line with our compliance responsibilities and reiterating our zero-tolerance approach to modern slavery.

OUR FUTURE PRIORITIES

Over the next reporting period, in order to further reduce the risk of modern slavery and human trafficking in our supply chain, we are committed to:

- Building on our training programme for colleagues who deal with procurement, focusing on raising awareness around sustainable procurement practices, with an emphasis on the importance of escalating any concerns around modern slavery for further investigation.
- Developing our existing supplier ESG risk rating system to include specific modern slavery indicators to classify suppliers by risk level.
- Using the above-mentioned risk-based supplier assessment framework to conduct targeted audits of higher-risk suppliers to ensure ongoing compliance with our Supplier Code of Conduct.

BOARD APPROVAL

This Modern Slavery Statement has been approved by the Operations Board on 1 August 2025 and is signed by our Managing Partner, Mark Ellis.

A handwritten signature in black ink, appearing to read 'Mark Ellis'.

Mark Ellis

Managing Partner

Our previous Modern Slavery Statements can be viewed [here](#).