MODERN SLAVERY ACT TRANSPARENCY STATEMENT

MODERN SLAVERY STATEMENT - 2019/20

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 11th March 2020 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 73 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

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, and 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 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 WORK TO DATE

Within the last 12 months:

- Those involved in procurement and human resources have been provided with training on modern slavery and human trafficking.
- We have implemented a process whereby we carry out due diligence on and risk assess all new suppliers. We are also carrying out an ongoing exercise to implement the same process for our historic suppliers.
- We now have a central database to collate and share information about suppliers across the business.
- All staff within procurement and human resources receive ongoing support and guidance from our General Counsel Partner and Counsel for Risk.

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 provide training and support to our employees involved in procurement in relation to the risk assessment and due diligence process they should follow.
- Continuing to risk assess prospective suppliers by requiring, at the outset of the
 procurement process, confirmation of the steps those suppliers have taken to reduce
 the risk of slavery and human trafficking in their supply chain.
- Requesting more detailed information from any suppliers identified as medium to high risk as to the steps they have taken to address slavery and human trafficking in the territories in which they operate, including the outcome of any due diligence carried out on their own business and high risk suppliers further down their supply chain.

Approved, and signed by

James.

Tamar Tammes

Managing Partner