

## MODERN SLAVERY

This statement is made by Bryan Cave Leighton Paisner LLP, a law firm and limited liability partnership registered in England and Wales and authorised and regulated by the Solicitors Regulation Authority (England and Wales) (“**BCLP UK**”). BCLP UK is required to publish a statement pursuant to section 54(1) of the Modern Slavery Act 2015 (“**MSA**”), and this is its statement for the financial year ending 31 December 2023. It sets out the overall commitment and steps taken to ensure that slavery and human trafficking are not present in BCLP UK’s business or direct supply chain.

### BCLP GROUP STRUCTURE

The Bryan Cave Leighton Paisner Group (“**BCLP Group**”) has 32 offices in nine countries and provides legal and related services to corporates and individuals. A list of the BCLP Group entities (“**BCLP Firms**”) and legal and regulatory information regarding them (including corporate registration details, contact details, a list of Partners and information about the way the BCLP Firms and their lawyers are regulated and insured, as appropriate) is contained in the legal notices section of our [website](#).

### OUR APPROACH

The BCLP Group is committed to carrying on its business in a responsible and ethical manner that respects the environment, as well as the rights and dignity of individuals and the communities where it operates and provides its services. This commitment is detailed in our Ethical Business Principles, which expressly addresses our approach and on-going risk management processes to slavery and human trafficking. Our Ethical Business Principles aim to ensure that the BCLP Group holds itself to the same high standards in the conduct of its business relationships and the provision of its services as is expected by its clients, and as it expects of its own suppliers and business partners. As part of BCLP UK’s ongoing commitment to take steps towards ensuring there is no risk of modern slavery and human trafficking in its business and its operations and supply chain, we continue to progressively and systematically review our operational profile, our internal controls and our external relationships.

As a regulated business, BCLP UK has a zero tolerance approach to modern slavery and human trafficking, and expects the same high standards and commitment from those with whom it does business. We have comprehensive employment policies and practices (including diversity and inclusivity, equal opportunities and non-discrimination, flexible working and anti-harassment) to

support this. We are committed to assessing any situations of concern regarding modern slavery and human trafficking on a case-by-case basis. The reporting mechanisms that we have in place provide channels of communication for staff who wish to raise issues or concerns internally, including our Speak-Up Policy. After conducting a risk assessment of our existing practices and procedures, BCLP UK has assessed its own business as low risk for modern slavery and human trafficking issues.

BCLP UK also has a Complaints Policy, should clients wish to make a complaint. BCLP UK's Compliance Officer for Legal Practice (a position that is mandatory under applicable regulation) is also a key point of contact both internally and externally, and has a regulatory duty to ensure that BCLP UK takes all reasonable steps to comply with its statutory obligations.

In addition, Our Global Procurement Director and Office of General Counsel supports the BCLP Group with supplier engagement, and there are resources available to help assess the modern slavery (and other) risks associated with suppliers, based on jurisdiction, industry and supplier policies and procedures. The standards we expect from our suppliers are clearly stated in our Supplier Code of Conduct, which reflects our Ethical Business Principles and which encourages suppliers to raise any issues of concern with us. Given the nature of the goods and services procured by BCLP UK, we have assessed the overall profile of our direct supply chain to be low risk for modern slavery and human trafficking issues.

## REPORT ON KPIS AND OTHER STEPS TAKEN

During 2023, the BCLP Group continued to develop its broader Environmental, Social and Governance ("**ESG**") framework, with which we seek to align and integrate our initiatives and controls for combatting the risk of modern slavery and human trafficking.

In 2023, we reviewed our procurement processes to ensure fitness for purpose. We have implemented a new tailored contract management platform and have implemented a revised global procurement policy. Work was also undertaken with internal stakeholders to upskill on supply chain management and review critical and high-risk suppliers.

We have continued to communicate our commitment to addressing modern slavery and human trafficking throughout our business including, for example, our annual awareness raising exercise regarding the risks of modern slavery and trafficking, which coincides with the UN International Day for the Abolition of Slavery. BCLP UK's Office of General Counsel has also continued its general awareness raising communications and training in relation to the risk of slavery and human trafficking, including targeted sessions with colleagues involved in procurement.

BCLP UK recognises the importance of its role as a corporate citizen, and has continued to promote external education and support international expert, peer and industry groups and engagement on ESG issues. We also continue to provide *pro bono* advice on a range of matters, including supporting victims of the Windrush scandal to apply for compensation under the Windrush

Compensation Scheme, supporting former members of the Afghan judiciary to apply for UK visas under the Government schemes, human rights charities focused on fair trials and the death penalty and inner city poverty and inequality in London. In addition, we are working with a child safeguarding charity on a global research mapping project to identify key gaps and geographical trends in national legislation requiring organisations to have a child safeguarding policy in place. Since March 2017, we have provided human rights charity Reprieve with a trainee from BCLP UK to work with the charity full time on a six-month *pro bono* secondment. We also host a weekly *pro bono* clinic in East London for members of the local community providing preliminary advice on a range of social welfare issues, including benefits, housing and employment.

## NEXT STEPS

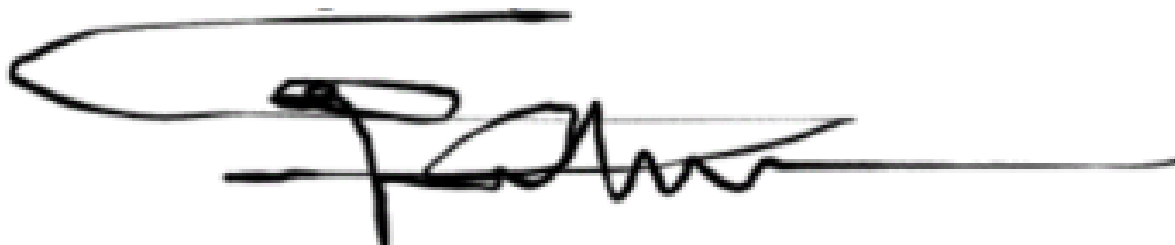
Our next steps and key performance indicators for the next financial year will include:

- continue to embed the firm's procurement policy globally;
- continue to develop our procurement function, including enhancing procedures, processes and resources throughout the business on a globalised basis;
- engage with our preferred firm network on the importance of responsible business conduct practices, including modern slavery;
- engage with relevant stakeholders to develop and approve a global Code of Conduct and align with wider responsible business conduct initiatives; and
- continue awareness raising and providing training on the risks of modern slavery and human trafficking in our business and supply chains.

## APPROVAL

Approved by BCLP UK Partnership on 31.05.2024

Approved by Segun Osuntokun as Global Senior Partner and as designated member of BCLP UK on 31.05.2024

A handwritten signature in black ink, appearing to read 'Segun Osuntokun', with a long horizontal line extending to the right.

## **MODERN SLAVERY STATEMENT (FOR THE FINANCIAL YEAR ENDING 31 DECEMBER 2023)**

This statement is made by Bryan Cave Leighton Paisner LLP, a law firm and limited liability partnership registered in England and Wales and authorised and regulated by the Solicitors Regulation Authority (England and Wales) (“BCLP UK”). BCLP UK is required to publish a statement pursuant to section 54(1) of the Modern Slavery Act 2015 (the “MSA”) and this is its statement for the financial year ending 31 December 2022. It sets out the overall commitment and steps taken to ensure that slavery and human trafficking are not present in BCLP UK’s business or direct supply chain.

### **BCLP GROUP STRUCTURE**

The Bryan Cave Leighton Paisner Group (“BCLP Group”) has 31 offices in 10 countries and provides legal and related services to corporates and individuals. A list of the BCLP Group entities (“BCLP Firms”) and legal and regulatory information regarding them (including corporate registration details, contact details, list of Partners and information about the way the BCLP Firms and their lawyers are regulated and insured, as appropriate) is contained in the legal notices section of our [website](#).

The BCLP Group is committed to carrying on its business in a responsible and ethical manner that respects the rights and dignity of individuals and the communities where it operates and provides its services. The BCLP Group has a zero tolerance policy concerning modern slavery and human trafficking and expects the same high standards and commitment from those with whom it does business. As part of BCLP UK’s ongoing commitment to take steps towards ensuring there is no risk of modern slavery and human trafficking in its business and its operations and supply chain, we continue to progressively and systematically review our operational profile, our internal controls and our external relationships.

### **OUR APPROACH**

The BCLP Group is committed to carrying on its business in a responsible and ethical manner that respects the environment, the rights and dignity of individuals and the communities where we operate and provide our services. This commitment is detailed in our Ethical Business Principles, which expressly address our approach to slavery and human trafficking. Our Ethical Business Principles aim to ensure that the BCLP Group holds itself to the same high standards in the conduct of its business relationships and provision of its services as is expected by its clients and as it expects of its own suppliers and business partners.

As a regulated business, BCLP UK has a zero tolerance approach to modern slavery and human trafficking. We have comprehensive employment policies and practices (including diversity and inclusivity, equal opportunities and non-discrimination, flexible working and anti-harassment) to

support this. After conducting a risk assessment of our existing practices and procedures, BCLP UK has assessed its own business as low risk for modern slavery and human trafficking issues.

We are committed to assessing any situations of concern regarding modern slavery and human trafficking on a case-by-case basis. The reporting mechanisms that we have in place provide a channel of communication for staff who wish to raise issues or concerns internally. During the course of 2022 we continued to raise awareness of the new Speak-Up policy, which was launched in 2021. BCLP UK also has a Complaints Policy should clients wish to make a complaint and our Supplier Code of Conduct encourages suppliers to raise any issues of concern with us. BCLP UK's Compliance Officer for Legal Practice (a position that is mandatory under applicable regulation) is also a key point of contact both internally and externally and has a regulatory duty to ensure that BCLP UK takes all reasonable steps to comply with its statutory obligations.

Our dedicated Global Procurement Director and Office of General Counsel supports the BCLP Group with supplier engagement and resources are available to help assess the modern slavery (and other) risks associated with suppliers based on jurisdiction, industry and their policies and procedures. The standards we expect from our suppliers are clearly stated in our Supplier Code of Conduct, which reflect our Ethical Business Principles. Given the nature of goods and services procured by BCLP UK, we have assessed the overall profile of our direct supply chain to be low risk for modern slavery and human trafficking issues.

## REPORT ON KPIS AND OTHER STEPS TAKEN

During 2022, the BCLP Group continued developing its broader Environmental, Social and Governance ("ESG") framework with which we seek to align and integrate our initiatives and controls for combatting the risk of modern slavery and human trafficking.

In 2022 we appointed a new Global Procurement Director and undertook a review of our global procurement process. Significant work was undertaken to update the procurement process to ensure it was fit for purpose working towards a globalised function, including identifying a tailored, centralised contract management platform and working on a revised procurement policy. Work was also undertaken with stakeholders in EMEA to upskill on supply chain management and review critical and high-risk suppliers.

We have continued to communicate our commitment to addressing modern slavery and human trafficking throughout our business including, for example, our annual awareness raising exercise regarding the risks of modern slavery and trafficking, which coincides with the UN International Day for the Abolition of Slavery. BCLP UK's Office of General Counsel has also continued its general awareness raising communications and training in relation to the risk of slavery and human trafficking, including targeted sessions with colleagues involved in procurement.

BCLP UK recognises the importance of its role as a corporate citizen and has continued to promote external education and support international expert, peer and industry groups and engagement on

environmental, social and governance issues, such as through initiatives of the International Chamber of Commerce, B20 and World Economic Forum. In 2022 BCLP became a founding member of the Business and Human Rights Lawyers Association. We also continue to provide pro bono advice on a range of matters including supporting welfare for immigrants in the context of the Windrush Compensation Scheme, supporting former members of the Afghan judiciary to apply for UK visas under the Government schemes, human rights charities focused on fair trials and the death penalty and inner city poverty and inequality in London. Since March 2017, we have provided human rights charity Reprieve with a BCLP trainee to work with the charity full time on a 6 month pro bono secondment.

## NEXT STEPS

Our next steps and key performance indicators for the next financial year will include:

- launch the new global procurement policy;
- further establish our new global procurement function, including enhancing procedures, processes and resources throughout the business on a globalised basis;
- implement and imbed the new contract management system;
- engage with our preferred firm network on the importance of responsible business conduct practices, including modern slavery;
- engage with relevant stakeholders to produce a global Code of Conduct and align with wider responsible business conduct initiatives;
- continue awareness raising and training on the risks of modern slavery and human trafficking in our business and supply chain.

## APPROVAL

Approved by BCLP UK Partnership on 29.06.2023

Approved by Lisa Mayhew as designated member of BCLP UK on 29.06.2023

A handwritten signature in black ink, consisting of a large, stylized initial 'L' followed by the name 'Isa'.

## **MODERN SLAVERY STATEMENT (FOR THE FINANCIAL YEAR ENDING 31 DECEMBER 2022)**

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### **BCLP Group Structure**

The Bryan Cave Leighton Paisner Group (“BCLP Group”) has 31 offices in 10 countries and provides legal and related services to corporates and individuals. A list of the BCLP Group entities (“BCLP Firms”) and legal and regulatory information regarding them (including corporate registration details, contact details, list of Partners and information about the way the BCLP Firms and their lawyers are regulated and insured, as appropriate) is contained in the legal notices section of our [website](#).

The BCLP Group is committed to carrying on its business in a responsible and ethical manner that respects the rights and dignity of individuals and the communities where it operates and provides its services. The BCLP Group has a zero tolerance policy concerning modern slavery and human

trafficking and expects the same high standards and commitment from those with whom it does business. As part of BCLP UK's ongoing commitment to take steps towards ensuring there is no risk of modern slavery and human trafficking in its business and its operations and supply chain, we continue to progressively and systematically review our operational profile, our internal controls and our external relationships.

## **Our approach**

The BCLP Group is committed to carrying on its business in a responsible and ethical manner that respects the environment, the rights and dignity of individuals and the communities where we operate and provide our services. This commitment is detailed in our Ethical Business Principles, which expressly address our approach to slavery and human trafficking. Our Ethical Business Principles aim to ensure that the BCLP Group holds itself to the same high standards in the conduct of its business relationships and provision of its services as is expected by its clients and as it expects of its own suppliers and business partners.

As a regulated business, BCLP UK has a zero tolerance approach to modern slavery and human trafficking. We have comprehensive employment policies and practices (including diversity and inclusivity, equal opportunities and non-discrimination, flexible working and anti-harassment) to support this. After conducting a risk assessment of our existing practices and procedures, BCLP UK has assessed its own business as low risk for modern slavery and human trafficking issues.

We are committed to assessing any situations of concern regarding modern slavery and human trafficking on a case-by-case basis. The reporting mechanisms that we have in place provide a channel of communication for staff who wish to raise issues or concerns internally. During the course of 2021 we worked with our offices across the Group to develop a new Speak-Up policy to embed our approach to ethical business practices and raising such issues, and in response to the EU Whistleblowing Directive. BCLP UK also has a Complaints Policy should clients wish to make a complaint and our Supplier Code of Conduct encourages suppliers to raise any issues of concern with us. BCLP UK's Compliance Officer for Legal Practice (a position that is mandatory under applicable regulation) is also a key point of contact both internally and externally and has a regulatory duty to ensure that BCLP UK takes all reasonable steps to comply with its statutory obligations.

Our dedicated Office of General Counsel supports the BCLP Group with supplier engagement and resources are available to help assess the modern slavery (and other) risks associated with suppliers based on jurisdiction, industry and their policies and procedures. The standards we expect from our suppliers are clearly stated in our Supplier Code of Conduct, which reflect our Ethical Business Principles. Given the nature of goods and services procured by BCLP UK, we have assessed the overall profile of our direct supply chain to be low risk for modern slavery and human trafficking issues.



## **Report on KPIs and other steps taken**

During 2021, the BCLP Group focused on further developing its broader Environmental, Social and Governance (“ESG”) framework with which we seek to align and integrate our initiatives and controls for combatting the risk of modern slavery and human trafficking.

Our focus in 2021 has been on building strong foundational knowledge and organisation structure for ESG issues with our internal management and operations. Our Firm continued to evolve the structural management of our supply chain by committing to dedicated senior resource. To better understand our existing ESG profile, we engaged a third party to undertake an independent assessment and aid us in identifying areas of improvement. These were communicated internally to key stakeholders and informed the continuing development of our strategic approach across this area. We have continued to communicate our commitment to addressing modern slavery and human trafficking throughout our business. For example, in December 2021 BCLP undertook a group-wide awareness raising exercise regarding the risks of modern slavery and trafficking, which coincided with the UN International Day for the Abolition of Slavery. BCLP UK’s Office of General Counsel has also continued its general awareness raising communications and training in relation to the risk of slavery and human trafficking, including targeted sessions with colleagues involved in procurement.

BCLP UK recognises the importance of its role as a corporate citizen and has continued to promote external education and support international expert, peer and industry groups and engagement on environmental, social and governance issues, including concerning human rights and modern slavery, and to provide pro bono advice on a range of matters including supporting welfare for immigrants in the context of the Windrush Compensation Scheme, human rights charities focused on fair trials and the death penalty and inner city poverty and inequality in London.

### **Next steps**

Our next steps and key performance indicators for the next financial year will include:

- raise awareness around our new ‘Speak Up’ Policy to encourage and more easily enable our colleagues to raise concerns;
- review our policy and risk assessment framework to ensure it effectively manages and mitigates risks; and
- continue to develop our procurement process to identify and mitigate risks in our supply chain and empower stakeholders to own and manage those risks.

### **Approval**

Approved by BCLP UK Partnership on 17.06.22

Approved by Lisa Mayhew as designated member of BCLP UK on 17.06.22

A large, bold, black handwritten signature that reads "Lisa". The signature is written in a cursive style with thick, dark strokes.

## **MODERN SLAVERY STATEMENT (FOR THE FINANCIAL YEAR ENDING 31 DECEMBER 2021)**

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### **BCLP Group Structure**

The Bryan Cave Leighton Paisner Group (“BCLP Group”) has 30 offices in 10 countries and provides legal and related services to corporates and individuals. A list of the BCLP Group entities (“BCLP Firms”) and legal and regulatory information regarding them (including corporate registration details, contact details, list of Partners and information about the way the BCLP Firms and their lawyers are regulated and insured, as appropriate) is contained in the legal notices section of our [website](#). BCLP UK is required under the MSA to publish a statement.

The BCLP Group is committed to carrying on its business in a responsible and ethical manner that respects the rights and dignity of individuals and the communities where it operates and provides its services. The BCLP Group has a zero tolerance policy concerning modern slavery and human trafficking and expects the same high standards and commitment from those with whom it does business. As part of BCLP UK's ongoing commitment to take steps towards ensuring there is no risk of modern slavery and human trafficking in its business and its operations and supply chain, we continue to progressively and systematically review our operational profile, our internal controls and our external relationships.

## **Our approach**

The BCLP Group is committed to carrying on its business in a responsible and ethical manner that respects the environment, the rights and dignity of individuals and the communities where we operate and provide our services. This commitment is detailed in our Ethical Business Principles, which expressly address our approach to slavery and human trafficking. Our Ethical Business Principles aim to ensure that the BCLP Group holds itself to the same high standards in the conduct of its business relationships and provision of its services as is expected by its clients and as it expects of its own suppliers and business partners.

As a regulated business, BCLP UK has a zero tolerance approach to modern slavery and human trafficking. We have comprehensive employment policies and practices (including diversity and inclusivity, equal opportunities and non-discrimination, flexible working and anti-harassment) to support this. After conducting a risk assessment on our existing practices and procedures, BCLP UK has assessed its own business as low risk for modern slavery and human trafficking issues.

We are committed to assessing any situations of concern regarding modern slavery and human trafficking on a case by case basis. The reporting mechanisms that we have in place provide a channel of communication for staff who wish to raise issues or concerns internally. BCLP UK has a Complaints Policy in place should clients wish to make a complaint and our Supplier Code of Conduct encourages suppliers to raise any issues of concern with us. BCLP UK's Compliance Officer for Legal Practice (a position that is mandatory under applicable regulation) is also a key point of contact both internally and externally and has a regulatory duty to ensure that BCLP UK takes all reasonable steps to comply with its statutory obligations.

Our dedicated Office of General Counsel supports the BCLP Group with supplier engagement and resources are available to help assess the modern slavery (and other) risks associated with suppliers based on jurisdiction, industry and their policies and procedures. The standards we expect from our suppliers are clearly stated in our Supplier Code of Conduct, which reflect our Ethical Business Principles. Given the nature of goods and services procured by BCLP UK, we have assessed the overall profile of our direct supply chain to be low risk for modern slavery and human trafficking issues.

## Report on KPIs and other steps taken

As per the steps set out in our statement last year, we have continued to develop our approach to responsible business conduct and the challenges presented by Covid-19 have directed the focus of this effort.

Following a difficult year, coping with change, uncertainty in relation to the pandemic and multiple lockdowns, we have sought to prioritise and support the well-being of our employees through the further development of our programme focusing on physical, mental and financial wellbeing. This programme includes:

- continued access to our mental health support services;
- developing a series of globally available sessions and webinars to help colleagues through many of the challenges presented by Covid-19;
- providing work from home resources and flexible working options for colleagues caring for children and relatives; and
- a Disaster Relief and Emergency Hardship Fund to support colleagues who have been seriously impacted by an unexpected hardship.

In further developing our responsible business conduct approach, BCLP UK continues to recognise the importance of our role as a corporate citizen. We have therefore taken a number of steps, including:

- promoting internal and external education on environmental, social and governance issues;
- providing perspectives and insight to inform the UN Global Compact's development of their work to support SDG16 - Peace, Justice and Strong Institutions, which is one of the UN Sustainable Development Goals ("SDG 16"), including a statement on business leadership via interviews by UN Global Compact Action Platform for SDG 16;
- provision of pro bono advice; and
- donating decommissioned iPhones and iPads to a local school for them to provide to families to access online learning.

In addition to our fundraising initiatives for our charity of the year (which partnership we agreed to extend by a further 6 months due to the impact of the pandemic on fundraising), we set up a BCLP UK Covid 19 fundraising page to raise money for three charities helping some of the most vulnerable groups of people affected by the pandemic: victims of domestic abuse (Refuge), homeless people (Crisis) and the elderly (Age UK) and ran various initiatives to raise funds for those causes. We also made numerous donations to national and local Covid fundraising appeals

supporting food banks, access to legal advice, homelessness and local charitable projects supporting the most vulnerable members of the community, most severely impacted by the pandemic.

BCLP UK's Office of General Counsel has also continued its general awareness raising communications and training in relation to the risk of slavery and human trafficking, including targeted sessions with colleagues involved in procurement. These sessions included liaising with relevant colleagues in our US offices as part of our continued effort to develop our global approach.

## **Next steps**

Our next steps and key performance indicators for the next financial year will include:

- continue to raise awareness of modern slavery obligations and risks throughout the BCLP Group;
- review and extend our risk assessment to identify current risks in our business across the BCLP Group to inform our next steps;
- review our policy framework to ensure it effectively manages and mitigates risks; and
- continue to develop our procurement process to identify and mitigate risks in our supply chain and empower stakeholders to own and manage those risks.

## **Approval**

Approved by the BCLP Audit and Risk Committee on 20 May 2021

Approved by BCLP UK Partnership on 11 June 2021

Approved by Lisa Mayhew as designated member of BCLP UK on 11 June 2021

A large, bold, handwritten signature in black ink, appearing to read 'LISA'.

## **MODERN SLAVERY STATEMENT (FOR THE FINANCIAL YEAR ENDING 31 DECEMBER 2020)**

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### **BCLP Group Structure**

The Bryan Cave Leighton Paisner Group (“BCLP Group”) has 30 offices in 10 countries and provides legal and related services to corporates and individuals. A list of the BCLP Group entities (“BCLP Firms”) and legal and regulatory information regarding them (including corporate registration details, contact details, list of Partners and information about the way the BCLP Firms and their lawyers are regulated and insured, as appropriate) is contained in the legal notices section of our [website](#). BCLP UK is required under the MSA to publish a statement.

The BCLP Group is committed to carrying on its business in a responsible and ethical manner that respects the rights and dignity of individuals and the communities where it operates and provides its services. The BCLP Group has a zero tolerance policy concerning modern slavery and human trafficking and expects the same high standards and commitment from those it does business with.

As part of BCLP UK's ongoing commitment to take steps towards ensuring there is no risk of modern slavery and human trafficking in its business and its operations and supply chain, and in light of the combination of legacy firms (Berwin Leighton Paisner LLP and Bryan Cave LLP) in 2018, we continue to progressively and systematically review our operational profile, our internal controls and our external relationships.

## **Our approach**

As a business which is regulated, the BCLP Group has a zero tolerance approach to modern slavery and human trafficking and comprehensive employment policies and practices (including diversity and inclusivity, equal opportunities and non-discrimination, flexible working and anti-harassment), BCLP UK has assessed its own business as low risk for modern slavery and human trafficking issues.

We are committed to assessing any situations of concern regarding modern slavery and human trafficking on a case by case basis. Our Whistleblowing Policy provides a channel of communication for staff who have concerns; we have a Complaints Policy in place should clients wish to make a complaint; and our Supplier Code of Conduct encourages suppliers to raise any issues of concern with us. BCLP UK's Compliance Officer for Legal Practice (a position which is mandatory under applicable regulation) is also a key point of contact both internally and externally and has a regulatory duty to ensure that BCLP UK takes all reasonable steps to comply with its statutory obligations.

Over the last year, the focus of our approach has continued to be influenced by the 2018 combination and the need to review policy and risk management procedures to ensure they are appropriate for the BCLP Group and its risk profile in respect of modern slavery.

## **Report on KPIs and other steps taken**

Since our last statement, BCLP UK has:

- continued development and testing of our global third party engagement software platform. We have also reviewed our Supplier Questionnaire and Supplier Code of Conduct;
- commenced a review of relevant internal policies and procedures addressing ethical business conduct and modern slavery related risks including our Professional Practice Principles Policy and Whistleblowing Policy so that they are fit for purpose for all of our offices;
- undertaken a due diligence exercise whereby we contacted over 200 third party legal service providers, which we work with in jurisdictions outside the United Kingdom, to request information on, and where appropriate, confirmation of procedures and controls in relation to modern slavery and human trafficking. All such suppliers were also provided with a copy of our Supplier Code of Conduct, and required to confirm they would comply with it;

- contributed to the legal sector's engagement with modern slavery and human rights related risks by:
  - continuing our dialogue with other international law firms about responsible and ethical business and supply chain issues with the aim of putting relevant peer learning into practice ourselves and the advice that we provide to our clients; and
  - supporting initiatives and speaking at global business and human rights conferences and events;
  
- continued our engagement with and provision of advice to our clients and other entities with whom we have business relationships about how to identify and manage the risk of modern slavery and human trafficking in their businesses and supply chains and in relation to their MSA statements. As part of this initiative we have also sought to contribute to raising awareness and education about modern slavery and broader human rights risks by publishing thought leadership concerning these topics.
  - The BCLP Group has also:
    - undertaken a group-wide awareness raising initiative regarding the risks of modern slavery and trafficking, which coincided with the UN International Day for the Abolition of Slavery; and
    - implemented global application of our Ethical Business Principles and Supplier Code of Conduct, which detail the high ethical standards the BCLP Group, expects both internally and with regard to external business relationships.

## **Next steps**

Our next steps and key performance indicators for the next financial year will include:

- further development of our overall approach to responsible business conduct;
- continued engagement with the legal sector regarding the role of law firms in addressing modern slavery and broader human rights risks and issues across a range of industries;
- continued engagement with, support for and advice to our clients on this issue;
- building upon our previous engagement with legal service providers, which we work with in jurisdictions outside the United Kingdom, to facilitate the sharing of best practice on addressing modern slavery risks;
- a phased roll out of our global third party engagement software platform coupled with on-line and face to face training and support for key business services personnel on core risks and



issues relevant to procurement processes, including modern slavery and introduction of more structured formal reviews with key suppliers;

- further general awareness raising communications and training for other personnel across the BCLP Group; and
- reviewing and updating our existing MSA risk assessment and liaison with personnel in offices (outside the United Kingdom) towards a phased implementation of control measures to other BCLP Group entities.
  - Approved by BCLP Management Committee – 26 June 2020
  - Approved by BCLP UK Partnership – 10 July 2020

**Date – 20.07.20**

A large, bold, handwritten signature in black ink. The signature consists of a large, sweeping initial 'L' followed by the name 'isa' in a cursive, lowercase font.

**Lisa Mayhew**

**Designated member of Bryan Cave Leighton Paisner LLP**

**MODERN SLAVERY STATEMENT (FOR THE FINANCIAL YEAR ENDING 31 DECEMBER 2019)**

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Regulation Authority (England and Wales). The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the 8 month period ending 31 December 2018. It sets out the overall commitment and steps taken to ensure that slavery and human trafficking are not present in its business or direct supply chain.

## **BCLP Group structure**

On 1 April 2018, Berwin Leighton Paisner LLP (“BLP LLP”) combined with Bryan Cave LLP, and BLP LLP changed its name to Bryan Cave Leighton Paisner LLP (“BCLP UK”).

The Bryan Cave Leighton Paisner Group (“BCLP Group”) has 32 offices in 11 countries and provides legal and related services to corporates and individuals. A list of the BCLP Group entities (“BCLP Firms”) and legal and regulatory information regarding them (including corporate registration details, contact details, list of Partners and information about the way the BCLP Firms and their lawyers are regulated and insured, as appropriate) is contained in the legal notices section of our website. BCLP UK is required under the Act to publish a statement.

The BCLP Group is committed to carrying on its business in a responsible and ethical manner that respects the rights and dignity of individuals and the communities where it operates and provides its services. The BCLP Group has a zero tolerance policy concerning modern slavery and human trafficking and expects the same high standards and commitment from those it does business with. As part of BCLP UK’s ongoing commitment to take steps towards ensuring there is no risk of modern slavery and human trafficking in its business and its operations and supply chain, and in light of the combination, we will be progressively and systematically reviewing our operational profile, our internal controls and our external relationships.

BCLP UK’s accounting year end has changed from 30 April to 31 December. This statement therefore acts as an interim update to our last annual statement and covers the period 1 May 2018 to 31 December 2018.

## **Our approach**

To properly and transparently address the risks of modern slavery and human trafficking we have developed a systematic, risk based approach to identifying, assessing and managing the risks within our business and direct supply chain.

As a business which is regulated, has a zero tolerance approach to modern slavery and human trafficking and comprehensive employment policies and practices (including diversity and inclusivity, equal opportunities and non-discrimination, flexible working and anti-harassment), BCLP UK has assessed its own business as low risk for modern slavery and human trafficking issues.

We are committed to assessing any situations of concern regarding modern slavery and human trafficking on a case by case basis. Our Whistleblowing Policy provides a channel of

communication for staff who have concerns; we have a Complaints Policy in place should clients wish to make a complaint; and our Supplier Code encourages suppliers to raise any issues of concern with us. BCLP UK's Compliance Officer for Legal Practice (a position which is mandatory under applicable regulation) is also a key point of contact both internally and externally and has a regulatory duty to ensure that BCLP UK takes all reasonable steps to comply with its statutory obligations.

During the relevant period we focused on:

1. BCLP UK's operations in England (this is the location of our largest office, even taking account of the combined BCLP Group profile, with the greatest number of staff and the most significant proportion of our business and turnover);
2. our core legal services business; and
3. integrating and improving the procurement process of the BCLP Group for our direct commercial suppliers.

## **Report on steps taken**

During the relevant period we commenced a review of procurement practices across the BCLP Group. This involved

- collaboration between our Head of Facilities Operations and Global Procurement and our Office of General Counsel, who are jointly responsible for our approach to combating the risk of modern slavery and human trafficking in our supply chain; and
- the design and testing of new software to standardise and systemise each legacy firm's processes and procedures for on-boarding and contract management of our commercial suppliers.
  - We have also:
    - employed a dedicated commercial contract manager in the UK;
    - launched our BCLP Core Values across the firm which re-enforces our zero tolerance approach and that commitment to carrying on our business in a responsible and ethical manner;
    - continued our dialogue with other international law firms about responsible and ethical business and supply chain issues with the aim of putting relevant peer learning into practice ourselves;

- contributed to the legal sector's engagement with this issue by supporting initiatives and speaking at global business and human rights conferences and events; and
- provided training and advice to our clients and other entities with whom we have business relationships about how to identify and manage the risk of modern slavery and human trafficking in their businesses and supply chains.

### **Next steps and KPIs for the next financial year**

Our next steps and key performance indicators for the next financial year will include:

- the phased roll out of our new commercial supplier on-boarding procedure and related contract management software, beginning with our UK and US offices;
- a firm-wide awareness raising initiative regarding risk of modern slavery and human trafficking; and
- the review of existing BCLP Group policies and procedures in relation to its own business, in particular, our Human Resources policies regarding hiring temporary/consultant staff and our whistleblowing policy.

**Date - 15.04.19**

A large, bold, handwritten signature in black ink. The signature consists of a stylized, sweeping initial 'L' followed by the name 'isa' in a cursive, lowercase font.

**Lisa Mayhew**  
**Designated member of Bryan Cave Leighton Paisner LLP**

## **MODERN SLAVERY STATEMENT (FOR THE FINANCIAL YEAR ENDING 30 APRIL 2018)**

This statement is made by Bryan Cave Leighton Paisner LLP, a law firm and limited liability partnership registered in England and Wales and authorised and regulated by the Solicitors Regulation Authority (England and Wales). The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 30 April 2018. It sets out the overall commitment and steps taken to ensure that slavery and human trafficking are not present in its business or direct supply chain.

### **BCLP Group structure**

On 1 April 2018, Berwin Leighton Paisner LLP (“BLP LLP”) combined with Bryan Cave LLP, and BLP LLP changed its name to Bryan Cave Leighton Paisner LLP (“BCLP UK”).

The Bryan Cave Leighton Paisner Group (“BCLP Group”) has 31 offices in 11 countries and provides legal and related services to corporates and individuals. A list of the BCLP Group entities (“BCLP Firms”) and legal and regulatory information regarding them (including corporate registration details, contact details, list of Partners and information about the way the BCLP Firms and their lawyers are regulated and insured, as appropriate) is contained in the legal notices section of our website. BCLP UK continues to be required under the Act to publish a statement.

The BCLP Group is committed to carrying on its business in a responsible and ethical manner that respects the rights and dignity of individuals and the communities where it operates and provides its services. The BCLP Group has a zero tolerance policy concerning modern slavery and human trafficking and expects the same high standards and commitment from those it does business with. As part of BCLP UK’s ongoing commitment to take steps towards ensuring there is no risk of modern slavery and human trafficking in its operations and supply chain, we will be reviewing our approach in light of our post-combination structure, including relevant business and operational profile and relationships, and will seek to address these issues in future statements.

Given the timing of the completion of the combination, this statement focuses on the efforts of the UK operations of BCLP UK up to 1 April 2018. BCLP UK had a consolidated global turnover of £264m for the financial year ending 30 April 2018 and employed over 1200 staff.

### **Our approach**

To properly and transparently address the risks of modern slavery we have developed a systematic, risk based approach to identifying and assessing the risk of modern slavery and human trafficking within our business and direct supply chain.

As a business which is regulated, has a zero tolerance approach to modern slavery and human trafficking and comprehensive employment policies and practices (including diversity and

inclusivity, equal opportunities and non-discrimination, flexible working and anti-harassment), BCLP UK has assessed its own business as low risk for modern slavery and human trafficking issues.

We are committed to assessing any situations of concern regarding modern slavery and human trafficking on a case by case basis. Our Whistleblowing Policy provides a channel of communication for staff who have concerns; we have a Complaints Policy in place should clients wish to make a complaint; and our Supplier Code encourages suppliers to raise any issues of concern with us. BCLP UK's Compliance Officer for Legal Practice (a position which is mandatory under applicable regulation) is also a key point of contact both internally and externally and has a regulatory duty to ensure that BCLP UK takes all reasonable steps to comply with its statutory obligations.

In light of the above, over the last year, our focus has been and continues to be on:

1. BCLP UK's operations in England which is the location of our largest office with the greatest number of staff and the most significant proportion of our business and turnover;
2. our core legal services business; and
3. our direct commercial supply chain.

### **Report on KPIs and next steps**

In the last financial year ending 30 April 2018 we have progressed a number of initiatives including:

- reviewed the way in which we resource the on-boarding and management of our suppliers
- risk rated over 700 suppliers for the UK office
- worked towards embedding our commercial supplier on-boarding and contract management approach beyond our UK focused initial phase to identify material commercial suppliers to our non-UK offices
- reviewed and updated our procurement process to ensure that addressing the risk of modern slavery and human trafficking is incorporated into our approach to ad hoc and low value suppliers
- reviewed and updated our internal resources to enable staff to manage direct commercial supplier relationships
- continued to embed our supplier on-boarding and contract management approach which promotes responsible and ethical relationships, by improving the skills and capacity of our UK based staff who deal with our direct commercial suppliers, providing staff training on our mandatory commercial supplier on-boarding process

- continued to promote our Ethical Business Principles (which were approved by the BLP LLP Board in 2016)
- continued to advise and work with clients in a number of sectors to develop their approach to managing the risk of modern slavery and human trafficking and broader human rights issues such as the implementation of UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- continued to raise awareness and sharing of knowledge and best practice across the legal profession in respect of modern slavery, human rights and responsible business practices issues by:
  - contributing to the development of International Bar Association guidance and tools on Human Rights Due Diligence for Corporate and Commercial transactions and training programs;
  - participating in a Law Firm Peer Learning Process to discuss emerging best practice for identification and management of modern slavery and human rights risk issues in our sector;
  - supporting the development of Manchester University's Business and Human Rights Catalyst, including an inter-disciplinary executive education course; and
  - speaking at global business and human rights conferences and events, including the UN Annual Forum on Business and Human Rights in Geneva in December 2017.

We have found no issues in relation to modern slavery and human trafficking related to our direct commercial suppliers in the context of goods and services supplied to BCLP UK in England.

### **Next steps**

As a result of the combination, the accounting year end of BCLP UK has changed from 30 April to 31 December. These next steps are therefore relevant to the period from 1 May 2018 to 31 December 2018.

During the course of that period we aimed to:

- begin a review of our approach to the risk of modern slavery and human trafficking in light of the combination and resulting change in group structure and scope of operations;
- refine our existing commercial supplier on-boarding and contract management approach;
- begin implementation of new contract management software;

- begin to review our commercial supplier on-boarding and contract management approach for offices outside of the UK;
- continue our dialogue with other international law firms about responsible and ethical business and supply chains with the aim of putting relevant peer learning into practice ourselves;
- contribute to the legal sector's engagement with this issue by contributing to initiatives and speaking at global business and human rights conferences and events; and
- provide advice to and work with our clients and other entities with whom we have business relationships about how to eradicate the risk of modern slavery and human trafficking in their businesses and supply chains.

**Date - 1.2.19**

A handwritten signature in black ink, appearing to read 'Lisa'. The signature is written in a cursive, fluid style with a large, sweeping initial 'L'.

**Lisa Mayhew**

**Designated member of Bryan Cave Leighton Paisner LLP**

## **MODERN SLAVERY STATEMENT (FOR THE FINANCIAL YEAR ENDING 30 APRIL 2017)**

**Note: On 1 April 2018, Bryan Cave LLP combined with Berwin Leighton Paisner LLP ("BLP LLP"), and BLP LLP changed its name to 'Bryan Cave Leighton Paisner LLP' ("BCLP UK").**



The statement below was published by BLP LLP prior to the completion of the combination, and contains references to the BLP Group's pre-combination name and structure, correct as at the date of publication. As part of BCLP UK's ongoing commitment to take steps towards ensuring there is no risk of modern slavery in its operations and supply chain, it will be reviewing its approach in light of the post-combination structure, including relevant business and operational profile and relationships, and will seek to address these issues in future statements.

This statement is made by Berwin Leighton Paisner LLP (BLP) pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 30 April 2017. It sets out the overall commitment and steps taken by BLP to ensure that slavery and human trafficking are not present in our business or direct supply chain.

## **BLP GROUP STRUCTURE**

BLP is a law firm and limited liability partnership registered in England and Wales and is authorised and regulated by the Solicitors Regulation Authority (England and Wales).

The Berwin Leighton Paisner Group, which provides legal and related services to corporates and individuals had a consolidated global turnover of £254m for the financial year ending 30 April 2017 and employs over 1200 staff. For the purposes of this statement, "BLP Group" means Berwin Leighton Paisner LLP, Berwin Leighton Paisner (Services), Berwin Leighton Paisner (Germany) LLP, Berwin Leighton Paisner (HK) LLP in association with Haley Ho & Partners, Goltsblat BLP LLP and Berwin Leighton Paisner (Myanmar) Limited. None of the entities within the BLP Group (other than BLP) fall within the reporting obligation at this time.

The BLP Group is committed to carrying on its business in a responsible and ethical manner that respects the rights and dignity of individuals and the communities where it operates and provides its services. The BLP Group has a zero tolerance policy concerning modern slavery and expects the same high standards and commitment from those it does business with.

## **OUR APPROACH**

As an international law firm the BLP Group's operations and suppliers are based all over the world. To properly and transparently address the risks of modern slavery we have developed a systematic, risk based approach to identifying and assessing the risk of modern slavery within our business and direct supply chain.

As a business which is regulated and which has a zero tolerance approach to modern slavery and comprehensive employment policies and practices (including diversity and inclusivity, equal opportunities and non-discrimination, flexible working and anti-harassment), we have assessed our own business as low risk for modern slavery and human trafficking issues.

Our initial focus has been, and will continue to be, on:

1. our operations in England which is the location of our largest office with the greatest number of staff and the most significant proportion of our business and turnover;
2. our core legal services business; and
3. our direct commercial supply chain.

In the last financial year ending 30 April 2017 we have:

- reviewed and revised existing internal policies, including our Professional Practice Principles and Whistleblowing Policy (which defines our internal behavioural expectations), our Global Limits of Authority Policy (which sets out contract authorisation principles) and our Health & Safety Policy, which in conjunction with other processes are intended to create an holistic and integrated policy approach across our business concerning the management of modern slavery risks.
- published our Ethical Business Principles (which were approved by the BLP Board) internally
- established a mandatory commercial supplier on-boarding process (initially for our UK offices as a pilot phase) which promotes responsible and ethical relationships
- established an internal portal equipped with tools and resources to enable staff to engage and manage direct commercial supplier relationships, including a supplier questionnaire
- developed and are seeking to introduce new contractual clauses to address legal and regulatory requirements in accordance with our policy/risk assessment approach
- published a Supplier Code of Conduct (which was approved by the BLP Board) as part of our direct commercial supplier management approach
- continued to improve the skills and capacity of our UK based staff who deal with our direct commercial suppliers. This education and training has increased awareness of the risk of modern slavery and human trafficking across BLP and particularly amongst these key staff
- undertaken risk assessments on direct commercial suppliers engaged by the UK offices to identify potential or actual risks concerning modern slavery
- promoted and contributed to the legal sector's engagement with, awareness raising and sharing of knowledge and best practice in respect of modern slavery, human rights and responsible business practices issues, by contributing to the development of International Bar Association guidance and tools on Human Rights Due Diligence for Corporate and Commercial transactions; speaking at global business and human rights conferences and events, including the Annual UN Forum on Business and Human Rights

- taken part in a peer learning process with a number of other international law firms to discuss emerging best practice for identification and management of modern slavery risk issues in our sector.

To date we have not discovered any issues of concern. Moving forward, we are committed to assessing any situations of concern regarding modern slavery and human trafficking on a case by case basis. Our Whistleblowing Policy provides a channel of communication for staff who have concerns; we have a Complaints Policy in place should clients wish to make a complaint; and our Supplier Code encourages suppliers to raise any issues of concern with us. BLP's Compliance Officer for Legal Practice (a position which is mandatory under applicable regulation) is also a key point of contact both internally and externally and has a regulatory duty to ensure that BLP takes all reasonable steps to comply with its statutory obligations.

## **NEXT STEPS**

During the course of the year to 30 April 2018 we aim to:

- review the way in which we resource the management of our suppliers, including whether we centralise the function and appoint a procurement manager
- work towards embedding our commercial supplier on-boarding and contract management approach beyond our UK focused pilot phase and consider our international operations footprint
- publish communications across our BLP Group offices to raise awareness and educate our staff on modern slavery and human trafficking and the situations in which it may arise
- continue to embed our processes and procedures and train relevant members of staff on the modern slavery and human trafficking elements of our commercial supplier on-boarding and contract management approach, including how to risk assess new suppliers, and current suppliers as their contracts come up for renewal, and, raising awareness about required measures when dealing with high risk suppliers
- continue our dialogue with other international law firms about responsible and ethical business and supply chains with the aim of putting relevant peer learning into practice ourselves
- continue to contribute to the legal sector's engagement with this issue by contributing to initiatives in this area and speaking at global business and human rights conferences and events
- continue to provide advice to and work with our clients and other entities with whom we have business relationships about how to eradicate the risk of modern slavery and human

trafficking in their businesses and supply chains.

Key Performance Indicators will be:

- the number of core direct commercial suppliers we have engaged with on the issue of modern slavery
- training and education events and other awareness raising activities we have delivered or contributed to including, internally for BLP Group staff, for core suppliers, to clients and other entities with whom we maintain business relationships
- the number of high risk supplier contracts we have reviewed and/or updated with enhanced modern slavery provisions
- the number of reported concerns about modern slavery or human trafficking.

**Date - 22.12.17**

A large, bold, handwritten signature in black ink. The signature is stylized and appears to read 'Lisa'. The first part of the signature is a large, sweeping stroke that curves upwards and then downwards, followed by the letters 'i', 's', and 'a' written in a cursive, lowercase style.

**Lisa Mayhew**

**Designated member of Bryan Cave Leighton Paisner LLP**

## **MODERN SLAVERY STATEMENT (FOR THE FINANCIAL YEAR ENDING 30 APRIL 2016)**

This statement is made by Berwin Leighton Paisner LLP (BLP) pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 30 April 2016. It sets out the overall

commitment and steps taken by BLP to ensure that slavery and human trafficking are not present in our business or direct supply chain.

## **BLP GROUP STRUCTURE**

BLP is a law firm and limited liability partnership registered in England and Wales and is authorised and regulated by the Solicitors Regulation Authority (England and Wales).

The Berwin Leighton Paisner Group, which provides legal and related services to corporates and individuals had a consolidated global turnover of £254m for the financial year ending 30 April 2016 and employs over 1200 staff. For the purposes of this statement, “BLP Group” includes Berwin Leighton Paisner LLP, Berwin Leighton Paisner (Services), Berwin Leighton Paisner (Germany) LLP, Berwin Leighton Paisner (HK) LLP in association with Haley Ho & Partners, Goltsblat BLP LLP and Berwin Leighton Paisner (Myanmar) Limited. None of the entities within the BLP Group (other than BLP) fall within the reporting obligation at this time.

We are committed to carrying on our business in a responsible and ethical manner that respects the rights and dignity of individuals and the communities where we operate and provide our services. We have a zero tolerance policy to modern slavery and expect the same high standards and commitment from those we do business with.

## **OUR APPROACH**

As an international law firm our operations and suppliers are based all over the world. To properly and transparently address the risks of modern slavery we have developed a systematic, risk based approach to identifying and assessing the risk of modern slavery within our business and direct supply chain. Our initial focus has been on our operations in England which is the location of our largest office with the greatest number of staff and the significant proportion of our business and turnover. We have started this process by reviewing our core legal services business and direct supply chain.

In the last financial year ending 30 April 2016 we have:

- established a dedicated project team to review procurement/external supplier management generally. Modern slavery and human trafficking forms a fundamental part of that remit and we are committed to working with suppliers to prevent slavery and human trafficking within their businesses and, specifically, where that is relevant to our business relationship with them. The team consists of representatives from our business services teams which has increased awareness of the risk of modern slavery and human trafficking across the firm and particularly amongst those staff dealing with our direct commercial external suppliers and key internal processes

- reviewed policies and procedures surrounding the engagement and management of external suppliers
- reviewed policies and procedures surrounding internal resourcing including employment and contracting practices
- commenced awareness raising and a dialogue about this topic with other law firms throughout the world who we work with on a regular basis (our Preferred Firm network) by addressing the risk of modern slavery and human trafficking at the network's annual partner conference in March 2016. We will be continuing this work through further various initiatives.

To date we have not discovered issues of concern. Moving forward, we are committed to assessing any instances of non-compliance regarding modern slavery and human trafficking on a case by case basis. Our Whistleblowing Policy provides a channel of communication for staff who have concerns and we have a Complaints Handling Policy in place should clients wish to make a complaint. BLP's Compliance Officer for Legal Practice (a position which is mandatory under applicable regulation) is also a key point of contact both internally and externally and has a regulatory duty to ensure that BLP takes all reasonable steps to comply with its statutory obligations.

## **NEXT STEPS**

During the course of the year to 30 April 2017 we aim to:

- introduce new Ethical Business Principles
- introduce a new Supplier Code of Conduct
- risk assess new suppliers, and current suppliers as their contracts come up for renewal and raise awareness and engage with high risk suppliers
- seek to introduce contractual rights to request compliance-related information and the right to audit in our high risk supplier contracts together with warranties and the right to terminate for breach of our Supplier Code
- implement a modern slavery and human trafficking training programme for relevant members of staff and generally communicate and raise awareness about this topic throughout the firm. We will also continue our dialogue with our Preferred Firm network
- continue to provide advice to and work with our clients on how to eradicate the risk of modern slavery and human trafficking in their businesses and supply chains.

Key Performance Indicators will be:

- the number of high risk suppliers we have engaged with on the issue of modern slavery
- training and education events and other awareness raising activities we have delivered – internally, with material suppliers and to clients
- the number of high risk supplier contracts we have updated with additional modern slavery provisions.

A handwritten signature in black ink, consisting of a large, sweeping initial 'L' followed by the name 'isa' in a cursive, lowercase script.

**Lisa Mayhew**

**Designated member of Bryan Cave Leighton Paisner LLP**