

# Slavery and Human Trafficking Statement

## 1. About Bristows LLP

- 1.1. Bristows LLP is a limited liability partnership registered in England under registration number: OC358808 and is authorised and regulated by the Solicitors Regulation Authority.
- 1.2. We provide legal services to international and UK clients. We hold offices in London and Brussels, but currently most of our personnel work remotely in accordance with government guidance relating to the COVID-19 outbreak.

## 2. Risk Assessment

- 2.1. As a regulated firm that provides professional services, we consider that we are at low risk of slavery or human trafficking occurring within our own business.
- 2.2. However, we are committed to taking steps to ensure that it does not occur in any of our supply chains. Our key suppliers that are most likely to present a risk include those that provide support in delivering office-based business services, generally related to facilities management.
- 2.3. Due to the nature of the business conducted by the firm, we do not consider that there is a significantly increased risk of issues relating to slavery or human trafficking arising in the firm or its supply chains as a result of the COVID-19 outbreak.

## 3. Slavery and Human Trafficking Policy

- 3.1. Our Slavery and Human Trafficking Policy is published on our intranet and applies to everyone who works for us.
- 3.2. Our Whistleblowing Policy is published on our intranet and ensures that anyone who works for us can raise any concerns about conduct or compliance confidentially (including concerns in relation to slavery and human trafficking) and be assured that these concerns will be dealt with appropriately.
- 3.3. As these policies are available online to everyone who works for us, and we provide sufficient means for reporting any issues related to slavery or human trafficking, we do not consider that these policies require updating as a result of the COVID-19 outbreak.

## 4. Our Supply Chains

- 4.1. Our Slavery and Human Trafficking Policy sets out how we manage our supply chains and includes the requirements set out below.
- 4.2. As part of our processes for contracting with new suppliers and renewing contracts with existing suppliers, we must, where reasonably practicable and appropriate: i) include specific prohibitions in our contracts with our suppliers against slavery and human trafficking, including a right for us to terminate the arrangement if the supplier breaches its obligations under the Modern Slavery Act 2015; and ii) check that the supplier has an appropriate slavery and human trafficking policy in place and/or has published a current slavery and human trafficking statement if the supplier is required to do so by the Modern Slavery Act 2015.
- 4.3. We must terminate our relationship with a supplier if they or their contractors and suppliers tolerate slavery or human trafficking in any part of their business or supply chains.
- 4.4. The heads of our business services operations must be trained on our Slavery and Human Trafficking Policy and all of our personnel must be made aware of our Slavery and Human Trafficking Policy.
- 4.5. Due to the nature of the goods and services procured by the firm, we do not consider that there is a significantly increased risk of issues relating to slavery or human trafficking arising in our supply chains as a result of the COVID-19 outbreak.

## 5. Summary of Steps Undertaken During the Previous Year

- 5.1. Members of our Slavery and Human Trafficking Committee, which includes the heads of our business services operations, have considered the steps we have taken in the previous year and we have updated our Slavery and Human Trafficking Statement accordingly.
- 5.2. Our Slavery and Human Trafficking Policy is available to all of our personnel and our Slavery and Human Trafficking Committee has continued to monitor and identify indicators of slavery or human trafficking in our supply chains.
- 5.3. We have carried out risk assessments on new suppliers (and existing supply chains across our business) to identify those suppliers we considered to be most at risk of having slavery or human trafficking in their business or supply chains.
- 5.4. For new suppliers that we identified as being at risk of having slavery or human trafficking in their business or supply chains, we obtained and reviewed their slavery and human trafficking statements where such statements were published.
- 5.5. Where new suppliers have not published a slavery and human trafficking statement, we have sought appropriate assurances from them that: i) there is no slavery or human trafficking in any part of their business; and ii) they are taking active steps to ensure that there is no slavery or human trafficking in any part of their supply chains.
- 5.6. We have updated our Slavery and Human Trafficking Risk List summarising our findings.
- 5.7. We have endeavoured to incorporate our standard clauses against slavery and human trafficking into any new contracts with existing and new suppliers.

## 6. Next Steps

- 6.1. The Slavery and Human Trafficking Committee will continue to monitor our supply chains to identify any risk of slavery and human trafficking and will review and update our Slavery and Human Trafficking Risk List.
- 6.2. Where we have identified new suppliers as being at risk and such suppliers do not have slavery and human trafficking statements, we will continue to seek appropriate assurances from those suppliers that: i) there is no slavery or human trafficking in any part of their business; and ii) they are taking active steps to ensure that there is no slavery or human trafficking in any part of their supply chains.
- 6.3. We will continue to endeavour to include our standard clauses against slavery and human trafficking in any new contracts with existing and new suppliers.
- 6.4. We will train a broader cross-section of our personnel on slavery and human trafficking, to include all of our personnel in teams who have responsibility for recruitment and procuring goods and services.
- 6.5. We will provide a notification to all of our personnel that we have updated our Slavery and Human Trafficking Statement, which will contain a reminder of where they can access our Slavery and Human Trafficking Policy.
- 6.6. We will continue to request that all of our Slavery and Human Trafficking Statements are published on the Business and Human Rights Resource Centre's Modern Slavery Registry.
- 6.7. We will continue to monitor government guidance and reports regarding the Modern Slavery Act 2015, particularly in relation to the COVID-19 outbreak, and consider updates to our internal procedures in light of such information.

This is Bristows LLP's Slavery and Human Trafficking Statement for the financial year 2019/2020 and it was approved by the membership of Bristows LLP on 15 October 2020.



**Joint Managing Partner**

**Bristows LLP**

**15 October 2020**