

UK MODERN SLAVERY ACT TRANSPARENCY STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “**Act**”) and constitutes the slavery and human trafficking statement for Goodwin Procter (UK) LLP (“**Goodwin UK**” or “**we**”) for the financial year ending 30 September 2022.

Modern slavery is defined in the Act as slavery, servitude, forced or compulsory labour and human trafficking. We are committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing effective systems and controls to safeguard against modern slavery in our business and supply chains.

Our Business

Goodwin UK is a limited liability partnership registered in England and Wales with registration number OC362294 and is authorised and regulated by the Solicitors Regulation Authority with registration number 564695. We are part of an international legal practice carried on by Goodwin Procter LLP and its affiliated undertakings across key markets in the United States, United Kingdom, France, Germany, Luxembourg, Hong Kong and Singapore.

As a law firm, we are subject to stringent professional duties and adhere to the highest standards of ethical behaviour. We believe that the risk of modern slavery occurring in our own business is low. We comply with all applicable employment laws relating to employee terms and conditions, including relating to pay.

Our Supply Chain

Goodwin UK’s supply chain can generally be divided into the following categories:

- **Professional Services:** Goodwin UK engages directly with third party professional service providers (for example local counsel, barristers, accountants, banks and insurers) in connection with client engagements. Goodwin UK’s requirements with respect to the standards that these service providers are expected to meet are set out in the relevant provisions in its terms of engagement with these service providers as well as being set out in the independent professional standards set by the relevant regulatory body of those service providers. These engagements are managed by the relevant practice group within Goodwin UK that engages the service provider;
- **UK Support Services and Suppliers:** Goodwin UK contracts directly with various third-party vendors , including suppliers of IT and AV equipment services, office cleaning, facilities management services, catering, courier services, office supplies, office equipment and fit out, travel agency services, taxi services, offsite storage, office space, restaurant/food services, events, marketing partnerships, HR services (e.g., benefits, recruitment, background checks and reporting). The relationship with these suppliers is managed by the relevant senior administrator within Goodwin UK (e.g. HR, Marketing, Office Management) who engages that vendor and overseen by the contract review team; and
- **Overseas Support Services and Suppliers:** These suppliers are primarily other Goodwin offices or services arranged by Goodwin Procter LLP (“**Goodwin US**”). Goodwin US contracts with vendors who provide services to its affiliated entities globally, including to Goodwin UK. The relationship with these global suppliers is managed by the relevant business function within Goodwin US and overseen by the contract review team.

Due Diligence Process

We take the following actions in respect of our direct supply chain in the UK :

- (i) a robust vendor selection process;
- (ii) a strict internal contract review process (including requesting the incorporation of obligations into Goodwin UK contracts to comply with UK modern slavery legislation);
- (iii) requesting our vendors to complete a questionnaire relating to modern slavery in order to provide us with information on the measures they have in place to monitor and combat modern slavery in their own businesses and supply chains;
- (iv) an annual audit of our new vendors which includes a review of each vendor's policies, procedures and/or statements in relation to modern slavery; and
- (v) an annual electronic checks for adverse media against our vendors.

Risk Assessment and Management

We consider the main areas of risk in our supply chain to be in the outsourcing of our IT and AV equipment services, office cleaning, facilities management services, courier services, office supplies, equipment and fit out, offsite storage, restaurant/food services and events. Our due diligence measures and the fact that our key suppliers are based in the UK or operate out of an office in the UK and do not provide services or goods directly to us from countries with a higher risk of modern slavery, further mitigate any risk and inform our continued use of these suppliers.

Key performance indicators:

Our targets for the financial year ending 30 September 2023 for measuring our performance in respect of minimising risk and making improvements to our modern slavery processes include:

- all relevant employees involved in vendor contract procurement to have undertaken relevant training on the Act;
- requiring all new direct suppliers to complete our modern slavery act questionnaire as part of the onboarding process;
- requesting all new direct suppliers to incorporate obligations that require compliance with UK modern slavery legislation into our contractual arrangements with them; and
- carrying out an internal audit of our direct suppliers for modern slavery risk and recording any decisions made not to engage with a vendor on the basis of there being an unacceptable risk of modern slavery in the relevant vendor's business.

Policies/Procedures

We are firmly committed to ensuring that relevant employment, health and safety, human rights laws and international standards are adhered to in the conduct of our business. We would not tolerate any instance of modern slavery in our business or supply chain, and we have a number of policies in place to reduce the risk of non-compliance, including a Complaints Handling Policy, Anti-Bribery and Corruption Policy, Anti-Money Laundering Policy and Manual, Compliance Incident Policy, Equal Employment Opportunity Policy, Anti-Harassment and Anti-Bullying Policy, Health and Safety Policy, Code of Conduct, Working with Recruiters Policy, Contract Review and Vendor Selection Policy and a Whistleblowing Policy.

We will continue to monitor the risks of modern slavery arising within our own business and our supply chain.

Training

We believe that an effective way for us to prevent modern slavery from occurring in any part of our business is through training. We have rolled out compulsory training in 2023 for relevant staff, in particular those involved in procurement for Goodwin UK, to ensure they are aware of modern slavery risks and how they could affect the business and our supply chain.

This statement has been approved by the Goodwin UK Management Committee on behalf of the members of Goodwin UK.



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Designated Member of Goodwin Procter (UK) LLP



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Dated: 4 July 2023