

## ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made by Fragomen (GB) Limited and Fragomen LLP (collectively, "Fragomen UK", "we", "us", or "our"), in respect of our actions and activities during the financial year ending 31 December 2023, pursuant to section 54 of the Modern Slavery Act 2015 (the "Act"). This statement was approved by the members of Fragomen LLP on 19<sup>th</sup> December 2024 and the board of directors of Fragomen (GB) Limited on 19<sup>th</sup> December 2024.

### OUR ORGANISATION

Fragomen UK is part of the worldwide Fragomen organisation ("Fragomen"), which is the world's leading exclusive provider of immigration services made up of law firms and consultancies with over 6,000 employees in more than 60 offices worldwide. In countries where Fragomen does not have offices or in-house practice groups, we work with carefully selected local advisors (called "Co-Counsel" or "Third Party Vendors") to deliver services to our clients in more than 170 countries.

For over 70 years, we have provided strategic immigration advice to a diverse range of clients from individuals to the world's leading multinational corporations. Fragomen's professionals are respected thought leaders in the immigration field providing expertise to governance bodies across the world including the US Congress, the UK Parliament, the European Union and the United Nations.

As an office-based global immigration services business, we also work with a wide range of facilities suppliers to support us in delivering services to our clients. These suppliers include, but are not limited to, real estate professionals, IT and technology professional services, business services such as cleaning, catering and security. Though some of our suppliers are local, others are engaged on a global scale.

Finally, as a global leader in immigration services, we are fortunate enough to find ourselves in an area of the legal services industry which is particularly attuned to the sensitivities of the human condition and the ills that threaten it. Given the nature of our business, we are uniquely positioned in aiding the fight against modern slavery directly by the very work that we do in that we assist people in securing legal status wherever they plan to work, study, or settle and thereby rendering them significantly less vulnerable to abuse.

### OUR POLICIES AND COMMITMENT

Fragomen UK has a zero-tolerance approach to modern slavery of any kind within our operations and supply chain. Our positive contribution to the work of our clients is matched by our commitment to running our own operations responsibly. We are committed to ensuring that modern slavery, human trafficking, child labour and any other abuse of human rights has no place in or around our organisation.

To deliver on our commitment, Fragomen UK has policies in place which set out the conduct we expect of our firm, all employees, partners, contractors and suppliers (including Co-Counsel and Third-Party Vendors).

Our Anti-Modern Slavery and Human Trafficking Policy, which applies to all our people and stakeholders, reinforces the responsibilities and standards expected within our business or in any of our supply chains with regards to complying with the Act.

In addition, as part of our ongoing commitment to combating modern slavery, we regularly review our firmwide and UK policies, including, but not limited to, our Code of Conduct, Whistleblowing Policy, Procurement Policy, and our Employment and Recruitment Policies to ensure they comply with the Act.

Fragomen UK ensures that our policies are ingrained in both our operations and supply chain by taking significant steps to raise awareness of their requirements and engaging in detail with our staff and key suppliers. We communicate our expectations to employees and suppliers with regards to adherence to our policies to fulfil our principal objectives and responsibilities in relation to the Act.

At Fragomen UK, people are our most valuable resource at all levels of the business structure. In addition to ensuring that our employees and the employees of our contractors are paid fairly (and beyond the minimum wage), our employees are also entitled to additional benefits as part of our commitment to ensure that their health and welfare are fully supported both within and outside the workplace. Our UK benefits packages are competitive and geared towards supporting wellbeing as a priority. For example, in addition to health insurance cover, our employees have access to General Practitioners and mental health support. As of 2023, all employees have access to Yulife, a gamified app designed to inspire healthy habits by rewarding users with YuCoin for physical activity, meditating and brain training..Employees can redeem YuCoin for gift cards, brand discounts, or donate to charitable causes.

We also offer added benefits aimed at employees with caring responsibilities; we are partnered with a leading global provider of employer- sponsored care, to support working parents and carers with discounted regular as well as emergency care solutions for children and adult/elder dependents.

## DUE DILIGENCE PROCESSES, RISK ASSESSMENT AND MANAGEMENT

As a professional services organisation, we consider the risk of modern slavery existing within our business to be low. However, to ensure that we are compliant with all applicable legislation and because of our commitment to the eradication of modern slavery and human trafficking, we have a cross-functional working group, led by management of Fragomen UK, to identify, assess, monitor and mitigate potential risk areas in our supply chains and protect whistle-blowers.

Within our contractual agreements and compliance statements, it is our standard practice to require warranties and undertakings from our key suppliers and business partners to ensure that there is no forced or compulsory human labour, human trafficking or any other form of exploitation in any part of their businesses or supply chains. In 2021, we reviewed and updated our supplier terms to bolster these contractual obligations and we have continued to use such updated supplier terms since.

In addition, our supplier onboarding process includes updated Anti-Modern Slavery questions and language alongside our standard due diligence checks to ensure our suppliers are committed to complying with local labour standards and assess the suitability of suppliers that provide services to us. We also ask our suppliers to sign our Compliance Certification on recertification which requires them to reconfirm their adherence to our Third-Party Vendors Code of Conduct which includes confirmation that they comply with labour standards and Anti-Modern Slavery laws.

## OUR EFFECTIVENESS IN COMBATING MODERN SLAVERY AND HUMAN TRAFFICKING

For the year ending 31 December 2023, we had no reported incidents of any modern slavery or human trafficking in our supply chains.

Whilst we are proud of the steps that we have taken to date to combat modern slavery and human trafficking, we understand that modern slavery is ever-changing and that our approach must evolve to remain effective.

### TRAINING

Fragomen UK strives to maintain the highest standards of employee conduct and ethical behaviour. This is reinforced through the various internal policies which our employees are required to adhere to, most of which are relevant to combating modern slavery.

In addition, Fragomen UK is committed to ensuring that all our people understand what modern slavery is, the circumstances in which it may occur, are aware of modern slavery risk indicators and are equipped to identify instances of possible modern slavery and human trafficking.

Our Anti-Modern Slavery training, which was reviewed, updated and rolled out in 2021, is a mandatory module that forms part of the induction package for all new joiners to ensure that they are educated and trained from the outset. All new joiners must complete the training within 30 days from the date on which their employment at Fragomen UK began. In addition, employees are required to regularly complete training on the Firm's Code of Conduct which incorporates the firm's commitment to anti-modern slavery and expectations from employees to comply with anti-modern slavery regulations.

In 2023, we continued the successful implementation of our Responsible Business Strategy ("RBS") which outlines our responsibilities and commitments to not only our employees but also the broader community. The intention of our RBS is to focus on five key "Pillars":

- (1) Corporate Social Responsibility;
- (2) Diversity, Equity and Inclusion;
- (3) Wellbeing;
- (4) Social; and
- (5) Environment and Sustainability

all of which, in one form or another, contribute to Fragomen UK's Anti-Modern Slavery programme.

Each Pillar has an employee representative "Lead" with a team of volunteer employees. The purpose of these Pillars is to raise awareness and promote the importance of each area; this is achieved via events, speaker engagements, and Policy initiatives with a view to ensuring that a culture of respect, inclusivity and consideration is embedded in all that we do. We have a RBS Board which is made up of the UK Partners and Corporate Leads. This Board provides guidance and approval for Pillar recommendations and grants funding for specific initiatives.

Beyond our regulatory duties, as an immigration law firm, Fragomen UK has an active interest in matters relating to the treatment (and sad mistreatment) of migrants and migrant populations, including trafficking.

While trafficking and asylum are not areas we specialise in, we want to help our employees understand the severe challenges that people can face through various events and communications and set that learning in the context of our own work on legal migration.

In 2023:

- We partnered with Talent Beyond Boundaries (“TBB”) to co-host a panel discussion on Displaced Talent, at The Conduit, with Ashurst and the United Nations High Commissioner for Refugees (UNHCR). The event celebrated the success of Cohort 1 of the Displaced Legal Talent Initiative (DLTI) and outlined how to navigate the recruitment process within the DLTI.
- Fragomen also partnered with the International Organization for Migration (“IOM”) and TBB to co-host a session called the “Displaced Legal Talent Initiative: One Year On.” The session took place at the Global Forum of PILnet in Brussels.

## CITIZENSHIP

We have dedicated many hours to supporting civil society bodies committed to these causes and some of our partners hold advisory, trustee or non-executive positions in these institutions. Fragomen UK provides pro-bono legal and advocacy services to certain charities for migrants in need of quality legal advice.

Signed

Nadine Goldfoot

DIRECTOR, for and on behalf of FRAGOMEN (GB) LIMITED

MANAGING PARTNER, for and on behalf of FRAGOMEN LLP

DATE

N. Goldfoot