



EIP EUROPE LLP

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015. It constitutes our slavery and human trafficking statement for the financial year ending March 2020.

As our turnover exceeded £36million for the first time in 2019/20, this is the first statement that we have been required to make.

EIP is committed to conducting its business ethically. We will therefore use this statement to set out the actions taken so far to combat slavery and human trafficking, and the steps that we will take in the future to improve our practices in this area.

Organisational structure

EIP Europe LLP (“EIP”) is a patent and trademark firm with offices in the United Kingdom, and in Germany. We also have a separate entity, EIP US LLP, operating in the United States.

We are a limited liability partnership, registered in England and Wales, and regulated by the Intellectual Property Regulation Board (IPReg). Certain Members (i.e. partners) and employees are also subject to the regulations of, and/or the professional codes of conduct from, the Solicitors Regulation Authority (SRA), the institute of Professional Representatives before the European Patent Office, the Chartered Institute of Patent Attorneys (CIPA), the Chartered Institute of Trade Mark Attorneys (CITMA), and others.

We help individuals and businesses to obtain, manage, enforce and defend their intellectual property rights. For further information about EIP, please visit www.eip.com/us/about/

Our supply chains

Our business is primarily office-based, and our primary supply chains support these operations. These include maintaining our office spaces (i.e. security, maintenance, office supplies, and cleaning), IT and technology services, other professional services, recruitment, and travel for business purposes.

We also contract with professional services firms around the world, which provide similar services (to those provided by EIP) for the jurisdictions in which they are permitted to act.

In common with many other professional services organisations, this means that we have a relatively short supply chain. We therefore believe that we are at low risk of slavery or human trafficking occurring within our business or its supply chains.

The majority of our office suppliers are based in either the UK or Germany. We recognise that these can be areas with potentially higher risks of slavery or human trafficking – including high levels of contracted labour. We therefore work with our suppliers, adopting a risk-based approach to assessing and managing our relationships with them. We are committed to opposing modern slavery in each of its forms, and we expect our suppliers to adopt the same high standards as we do.

Our policies on slavery and human trafficking

As a highly regulated business, and an employer of professionally skilled and qualified people, the risk of modern slavery or human trafficking existing within our business is low. We also have robust employment screening policies and procedures in place to further reduce the risk. Each of our



employees is paid fairly for the work performed, and we ensure that those working for our suppliers maintaining our office spaces also receive a fair wage from their employers.

We have reviewed our workplace policies and procedures to ensure their effectiveness in identifying and tackling modern slavery issues. We are confident that our policies and procedures demonstrate our commitment to acting ethically.

We have direct relationships with our suppliers, and only Members and senior support employees are permitted to agree terms with suppliers – once due diligence has taken place.

Our employee handbook makes it clear that, in addition to any penalties that might be imposed by the law, any Member or employee of EIP who violates our policies (including those setting out the required standards for professional conduct), will be subject to disciplinary procedures (up to and including termination of Membership or employment).

EIP would also seek to terminate its relationship with any supplier found to be in violation of section 54(1) of the Modern Slavery Act 2015. We would then refer relevant matters to the appropriate enforcement agencies or authorities.

Our people and our suppliers are therefore expected to report, at the earliest opportunity, any activity or behaviour that might lead to (or suggest) slavery or human trafficking in any part of our business or its supply chains.

EIP is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery (of whatever form) is taking place within EIP or its supply chains – including if the report is mistaken.

Our Bribery and Corruption Policy, and our Whistleblowing Policy, both reinforce these commitments. These are contained within our employee handbook, which is provided to all new employees – and available to all of our people through our intranet.

Risk assessment

As stated above, EIP has assessed the risk of slavery and human trafficking within its own business to be very low.

As part of our process of identifying and mitigating risk levels, we have processes in place to:

- Identify and assess potential risk areas in our supply chains
- Mitigate any risk areas identified in our supply chains
- Monitor potential risk areas in our supply chains

Supplier adherence

We have a 'zero tolerance' approach to slavery and human trafficking.

Where reasonably practicable and appropriate, our contracts with suppliers will include specific provisions against slavery and human trafficking, with the option for us to terminate an arrangement if the supplier breaches its obligations under the Modern Slavery Act 2015.

We will also check that each supplier has published its own modern slavery and human trafficking statement (where they are required to do so), and review copies of any statements that exist.



Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and its supply chains, we intend to provide training and guidance to our people. This will include ensuring that all of our people are aware of our stance on slavery and human trafficking, and ensuring that those who have responsibility for procuring goods and services are prioritised for appropriate training and guidance.

Next steps

Following our initial review of our policies and procedures, we intend to take the following steps to allow us to combat slavery and human trafficking:

- Create a specific Anti-Slavery and Human Trafficking Policy, to be published within our employee handbook
- Develop our procurement practices – to include carrying out risk assessments on our existing suppliers, and on any new suppliers, to identify those we consider to be most at risk of having slavery or human trafficking in their own businesses
- Where risks are identified, we will obtain and review the modern slavery statements for those businesses, and/or seek assurances that they are taking active steps to ensure there is no slavery or human trafficking within their own businesses or supply chains
- Develop appropriate systems to allow us to engage more effectively with suppliers, where we have assessed a higher risk based on our risk assessment process. The aim will be to encourage those suppliers to develop their own measures to minimise the risks of slavery and human trafficking within their own organisations
- Consider the role that our recently created Corporate Social Responsibility focus group can take in developing our approach to managing the risks of modern slavery

Board approval

This statement has been approved by the Executive Board, and is signed on behalf of EIP by:

A blue ink signature, appearing to be 'J Spaargaren', written in a cursive style.

Jerome Spaargaren
Partner and Founder

A black ink signature, appearing to be 'Keith Rae', written in a cursive style.

Keith Rae
Chief Operating Officer