

HUMAN RIGHTS, LABOUR STANDARDS AND MODERN SLAVERY POLICY AND STATEMENT

1. Introduction and status of this statement

- a. Cleveland Scott York LLP (the “Firm”) is committed to respecting internationally recognised human rights and to preventing modern slavery and human trafficking in its business and supply chains.
- b. The principles reflected in this Policy and Statement are informed by the United Nations Universal Declaration of Human Rights, the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, the Ten Principles of the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.
- c. The Firm’s annual turnover is below the threshold at which publication of a slavery and human trafficking statement is mandatory under section 54 of the Modern Slavery Act 2015. Nevertheless, the Firm publishes this statement voluntarily and in support of its obligations as a supplier to the public sector.
- d. This statement describes the Firm’s approach to modern slavery and the steps taken during the financial year ended 31 March 2026. It also sets out the Firm’s continuing Human Rights and Labour Standards Policy.
- e. This Policy applies to all partners, directors, officers and employees of Cleveland Scott York and its wholly-owned subsidiaries (“Cleveland Scott York Employees”).
- f. Overall responsibility for implementation of this Policy rests with the Practice Director, reporting to the members of the LLP.

2. Organisation, business and supply chains

- a. Cleveland Scott York is a firm of patent and trade mark attorneys providing intellectual property services to clients in the United Kingdom and internationally.
- b. There are two distinct elements of the Firm’s supply chain:
 - i) suppliers of business products and services required for the Firm to operate, most of which are based in the UK; and
 - ii) suppliers of professional services used to deliver intellectual property services and to register and protect intellectual property rights globally. Many of these suppliers are overseas professional firms.
- c. The Firm considers the risk of modern slavery within its own directly employed workforce to be low. The direct risk within the professional firms that it instructs is also considered

low because these are predominantly professional-service organisations. The Firm recognises, however, that modern slavery risks can arise further upstream in any supply chain, including in relation to goods and services procured for ordinary business operations.

3. General principles

- a. Cleveland Scott York seeks to provide a working environment in which employees are treated with respect, dignity and consideration. Its policies and procedures are intended to support fairness in the recruitment, development and retention of employees.
- b. All employment must comply with applicable laws and regulations in the countries in which Cleveland Scott York operates. Where local law provides higher or additional protection of human and employment rights, the local requirements take precedence.
- c. All Cleveland Scott York Employees are required to report actual or suspected breaches of this Policy through the appropriate internal reporting route – that is to say to the Practice Director, their line manager failing which any partner. The Firm will consider reports promptly and take appropriate action where a concern is substantiated.
- d. This Policy and Statement will be reviewed annually and updated where appropriate to reflect changes in the Firm's business, supply chains, identified risks and actions taken. Sufficient and proportionate resources will be made available to support the management of labour and modern slavery risks.

4. Specific provisions

a. Human Rights

- i. Cleveland Scott York supports the principles of internationally recognised human rights.
- ii. Each Cleveland Scott York Employee shall be treated with dignity and shall not suffer harassment, physical or mental punishment or other forms of abuse.
- iii. The Firm maintains grievance mechanisms through which employees can raise concerns and seek appropriate remediation, and welcomes open feedback from employees on matters affecting the business.
- iv. The Firm will inspect and make copies of employees' identity, proof of age and immigration documents where necessary to establish their right to work, but will never retain or withhold original documents as a means of restricting an employee's freedom.

b. Freedom of Association

- i. Cleveland Scott York recognises and respects the right of employees to establish and join organisations designed to engage in collective bargaining and other lawful initiatives to further and defend the interests of the workforce.
- ii. No employee shall be dismissed or otherwise prejudiced because of membership of such an organisation or lawful participation in its activities. Employment shall not be conditional upon an employee not joining, or relinquishing membership of, such an organisation.

c. Modern Slavery, Compulsory Labour and Human Trafficking

- i. Cleveland Scott York has a zero-tolerance approach to modern slavery. It does not accept or condone slavery, servitude, forced or compulsory labour or human trafficking in its own operations or supply chains.
- ii. All Cleveland Scott York Employees provide their services on an entirely voluntary basis and no person shall be forced to remain in the Firm's employment against their will.
- iii. Employees are expected to raise at the earliest opportunity any concern or suspicion of modern slavery in any part of the Firm's business or supply chains. Concerns may be raised through the Firm's normal management, grievance or whistleblowing arrangements, as appropriate. No employee will be penalised for raising a genuine concern in good faith.

d. Child Labour

- i. Cleveland Scott York complies with applicable child labour laws and supports relevant international labour standards. The minimum age of a Cleveland Scott York Employee shall not be less than the age of completion of compulsory education in the UK and, in any event, shall not be less than 16 years.
- ii. Where work is hazardous within the meaning of International Labour Organisation Convention No. 138 concerning Minimum Age, the minimum age shall be 18.
- iii. For the avoidance of doubt, this does not prevent the Firm from offering appropriate short periods of work experience or suitable holiday work to persons under 18, subject to applicable legal and safeguarding requirements.

e. Recruitment

- i. The Firm will use reputable recruitment agencies where appropriate, including agencies assisting with permanent recruitment and, occasionally, the provision of temporary staff. The Firm expects such agencies to comply with applicable

employment and labour laws and not to charge candidates recruitment fees for services for which the Firm is responsible.

- ii. On recruitment, employees will receive written information setting out the key conditions of employment and a contract of employment in accordance with applicable legal requirements.

f. Discrimination

- i. Cleveland Scott York prohibits unlawful discrimination and harassment against any employee or applicant for employment.
- ii. This provision should be read with the Firm's Equality, Diversity and Inclusion Policy.

5. Modern slavery risk assessment and management

- a. The Firm applies a proportionate, risk-based approach to modern slavery. In assessing risk it may take account of factors including the nature of the goods or services being purchased, the location in which work is performed or goods are produced, the use of subcontracting or labour-intensive activities, and any credible information indicating elevated labour-rights risks.
- b. The Firm regards its direct professional-services supply chain as generally low risk.
- c. Potentially higher risks may arise further upstream in the supply chains for certain goods or labour-intensive services used in ordinary business operations such as facilities management; cleaning; catering; IT hardware manufacturing and office supplies.
- d. The Firm will focus additional enquiries and controls on suppliers or categories of expenditure where circumstances indicate an elevated risk.

6. Supplier due diligence and remediation

- a. The Firm seeks to use reputable suppliers. Professional suppliers are commonly selected following direct contact, professional references, established working relationships or meetings at international professional conferences.
- b. Modern slavery and human-rights considerations form part of supplier selection and review where proportionate to the identified risk. Where circumstances indicate an elevated risk, the Firm may seek additional information or assurances concerning a supplier's employment practices, modern slavery policies, supply-chain controls or compliance with applicable law.
- c. The Firm will not knowingly engage a supplier that uses or benefits from modern slavery. Where credible concerns arise, the Firm will investigate them proportionately and consider appropriate remedial action. Depending on the circumstances this may include seeking

further assurances or corrective action, suspending new instructions or purchases, or terminating the supplier relationship. Where appropriate, suspected criminal conduct will be reported to the relevant authorities.

7. Measuring effectiveness

- a. The Firm reviews the effectiveness of its approach to modern slavery as part of the annual review of this Policy and Statement. Appropriate indicators include:
 - i) the number and nature of modern slavery concerns reported to the Firm;
 - ii) the number of suppliers or supplier categories identified as requiring additional modern slavery review or enquiries;
 - iii) any remedial action required of suppliers, including any supplier relationships suspended or terminated because of modern slavery concerns; and
 - iv) completion of any modern slavery awareness or training activity provided to relevant personnel.
- b. For the financial year covered by this statement: no such concerns were reported and no remedial action was considered necessary.

8. Training and awareness

- a. The Firm will ensure that personnel with responsibility for procurement or material supplier relationships are made aware of this Policy, the indicators of potential modern slavery risk and the process for escalating concerns.
- b. In the year ended 31 March 2026 training was provided by drawing the attention of new joiners to the policy document on modern slavery which forms part of the Staff Handbook.
- c. The approach to training will be reviewed in the year to 31 March 2027.

9. Review, approval and publication

- a. This Policy and Statement will be reviewed annually and updated where appropriate.
- b. This statement was approved by the members of Cleveland Scott York LLP acting as the governing body of the LLP on 15 September 2026 and will be published on the Firm's website.

Signed on behalf of Cleveland Scott York LLP by:



T J Faulkner

Designated Member

Date: 15 September 2026