

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

This statement is made pursuant to section 54 of the UK's Modern Slavery Act 2015 (the "Act") and constitutes the slavery and human trafficking statement of Steptoe International (UK) LLP (the "Firm" or "we").

The Act makes it an offence for a person (X) (1) to hold another person (Y) in slavery or servitude in circumstances where X knows or ought to know that Y is held in slavery or servitude, or (2) to require another person (Y) to perform forced or compulsory labour in circumstances where X knows or ought to know that the other person is being required to perform forced or compulsory labour. Consent by Y does not preclude a finding of slavery.

We are committed to acting ethically and with integrity in our business dealings and relationships, and to implementing effective systems and controls to safeguard against modern slavery in our business and supply chains.

1. Our Business

- 1.1. The Firm is a limited liability partnership registered in England and Wales with registration number OC395074. It is authorised and regulated by the Solicitors Regulation Authority with registration number 635838, and is part of an international legal practice carried on by Steptoe LLP and affiliated undertakings (with offices in the United States, London, Brussels, Beijing and Hong Kong).
- 1.2. We believe that the risk of modern slavery occurring in the Firm's own business is very low. We are subject to stringent professional duties and standards of behaviour, and we comply with applicable employment laws relating to employee terms and conditions, including relating to pay.

2. Our Supply Chain

- 2.1. Our suppliers comprise suppliers of IT, office cleaning and other facilities management providers, catering, courier services, office supplies and professional service providers.
- 2.2. Some of our suppliers are regulated entities: these include law firms, banks and insurers.
- 2.3. In our supply chain, we consider the main areas of risk to be in the outsourcing of our cleaning, office supplies, facilities management and courier services. We consider the risk of modern slavery in those providers to be low, including for the following reasons:
 - (1) many of our UK suppliers have their own modern slavery policies and procedures in place;
 - (2) we have in place processes to select vendors and review contracts, which includes consideration of modern slavery; and

(3) as part of our due diligence, we ask those suppliers who provide anything above a *de minimis* level of service to us to complete a questionnaire relating to modern slavery, to provide information on the measures they have in place to monitor and combat modern slavery in their own business and supply chains. The responses to those questionnaires inform our continued use of these providers.

3. Policies/Procedures

- 3.1. We would not tolerate any instance of modern slavery in our business or supply chain.
- 3.2. We are committed to adhering to relevant employment, health and safety, and human rights laws. Our approach to modern slavery is one aspect of that.
- 3.3. Other policies which are in place and which may further reduce the risk non-compliant behaviour including modern slavery, include a Complaints-Handling Policy, Anti-Bribery Policy, Anti-Money Laundering Manual, Sanctions Policy, Anti-Harassment Policy, Equality & Diversity Policy, and Whistleblowing Policy.
- 3.4. We will continue to monitor the risks of modern slavery arising within our own business and our supply chain.

4. Training

- 4.1. Staff who are responsible for dealing with our suppliers, such as IT, human resources, accounts, office services and marketing staff, receive training to ensure that they are aware of modern slavery, could recognise it in our own business and our supply chain, and will report it if it is suspected.

This statement has been approved on behalf of the members of the Firm.

Signed:

Angus Rodger (COLP)

Date: