Steptoe
STEPTOE & JOHNSON UK LLP

5 Aldermanbury Square
London EC2V 7HR England
Tel: +44(0)20 7367 8000
Fax: +44(0)20 7367 8001
DX 206 London
www.steptoe.com

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 Steptoe & Johnson UK LLP ("Steptoe UK" or "we") for the financial year ending 31 December 2018.

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

Steptoe UK Is a limited liability partnership registered in England and Wales with registration number OC395074 and is authorised and regulated by the Solicitors Regulation Authority with registration number 635838. We are part of an international legal practice carried on by Steptoe & Johnson LLP and its affiliated undertakings across key markets in the United States, London, Brussels and Beijing.

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

Our supply chain consists of suppliers of IT, office cleaning and other facilities management providers, catering, courier services, office supplies and professional service providers, many of which are regulated law firms, banks and insurers subject to their own regulatory requirements.

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 are therefore asking these suppliers, who provide anything above a de minimis level of service to us, to complete a questionnaire relating to modern slavery, which will provide us with additional information on the measures they have in place to monitor and combat modern slavery in their own business and supply chains. The responses to these questionnaires will inform our continued use of these providers in future. However, we anticipate the risk to be low as a result of our internal contract review and vendor selection process and because we anticipate that many of our UK suppliers will have in place their own policies and procedures in relation to modern slavery.

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 Policy, Anti-Money Laundering Manual, Anti-Harassment Policy, Equality & Diversity Policy, and Whistleblowing Policy.

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

Steptoe & Johnson UK LLP is a limited liability partnership registered in England and Wales
under number OC395074 with its registered office at 5 Aldermanbury Square, London EC2V 7HR.
Steptoe & Johnson UK LLP is authorised and regulated by the Solicitors Regulation Authority under number 635838, and affiliated with the US firm of Steptoe & Johnson LLP.

Training

We believe that one of the most effective ways for us to prevent modern slavery from occurring in any part of our business is through training. We continue to work on identifying training needs within Steptoe UK to ensure that all relevant staff, including those in London responsible for dealing with our suppliers, such as IT, human resources, accounts, office services and marketing staff, will be aware of modern slavery risks and how they could affect us and our supply chain.

This statement has been approved on behalf of the members of Steptoe & Johnson UK LLP.

Signed

Matthew Coleman (Compliance Officer for Legal Practice)

Dated: 19th July 2019