Modern Slavery Statement (UK)

ORRICK, HERRINGTON & SUTCLIFFE (UK) LLP MODERN SLAVERY STATEMENT

This statement is made on behalf of Orrick, Herrington & Sutcliffe (UK) LLP pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement.

ORGANISATIONAL STRUCTURE

Orrick, Herrington & Sutcliffe (UK) LLP, a multinational practice of registered European and foreign lawyers and English solicitors, is a limited liability partnership incorporated in England and Wales (registered number 0C414172) and authorised and regulated by the Solicitors Regulation Authority. It is closely affiliated to, though independent of, other Orrick entities including Orrick Herrington & Sutcliffe (Europe) LLP, a multinational practice of registered European and foreign lawyers and English solicitors which is a limited liability partnership incorporated in England and Wales and authorised and regulated by the Solicitors Regulation Authority, and Orrick, Herrington & Sutcliffe LLP, a limited liability partnership registered in and organised under the laws of the state of California.

OUR APPROACH

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to ensuring there is transparency in our own business, and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We have put in place a Modern Slavery Policy which is supported by our other internal policies and HR processes such as the disciplinary, grievance and whistleblowing policies in our employee handbook, and all staff are encouraged to take responsibility for ensuring that there is no breach of the Policy and to report any concerns.

OUR SUPPLY CHAIN

As a regulated professional services firm, we engage a range of suppliers to enable our lawyers to provide services to our clients and to support the running of the Firm. Most of our suppliers comprise professional service providers, including legal counsel, banks, consultants and tax and accounting services. A relatively smaller proportion of our supply chain consists of those required to support our internal operations, including IT services, recruitment, travel and facilities management (e.g. maintenance, catering and cleaning services). We generally foster long-term relationships with our suppliers, which we believe involves less risk as we have greater knowledge of their operations and policies. On this basis, we have assessed our overall risk of exposure to modern slavery to be low.

SUPPLIER DUE DILIGENCE

Notwithstanding our low level of exposure to the risk of modern slavery, we remain vigilant to the risks and have developed a risk-based anti-slavery and human trafficking strategy, which is facilitated by a two-staged risk assessment process. First, we screen new and existing suppliers against high-level contextual risk factors including country risks factors, sector-specific risk factors and risk factors associated with particular supply chains. Secondly, where a supplier presents a higher risk for modern slavery, we escalate the supplier to a more in-depth analysis, and where appropriate, require the supplier to adhere to our Supplier Code of Conduct which sets out the ethical standards that must be adhered to in order to do

business with us. We may also include specific prohibitions against modern slavery and human trafficking within relevant service agreements and require our suppliers to hold their own suppliers to the same high standards.

TRAINING

Individuals within the firm who maintain responsibilities for the procurement of goods and services receive training on the identification of modern slavery risks and contributing factors, in addition to guidance on the policies and procedures that we have in place.

REVIEW

We review our measures to address modern slavery risks each year. Further to a recent review, we have concluded that our existing measures remain proportionate and effective. However, we will continue to review our processes and assess the effectiveness of our approach to ensure that we meet our obligations under the Act and maintain our high ethical standards.

Simon Willis

Office Leader

for and on behalf of Orrick, Herrington & Sutcliffe (UK) LLP

November 2020