

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 anti-slavery and human trafficking statement. References in this statement to "we", "us", "our", "Orrick" are references to Orrick, Herrington & Sutcliffe (UK) LLP. It covers the financial year of 2021/2022.

ORGANISATIONAL STRUCTURE

Orrick, Herrington & Sutcliffe (UK) LLP, a multinational practice of registered European, foreign lawyers and English solicitors, is a limited liability partnership incorporated in England and Wales (registered number 0C414172) authorised and regulated by the Solicitors Regulation Authority ("SRA"). 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, authorised and regulated by the SRA, 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, which is supported by related internal policies and processes, including but not limited to, our Supplier Code of Conduct reflects our zero-tolerance approach. All staff are encouraged to take responsibility for ensuring that there is no breach of our policies and to report any concerns.

RELATED HUMAN RIGHTS INITIATIVES

Pro bono service is a value that is shared across our firm, and our globally recognized programme demonstrates our commitment to upholding and promoting human rights. We work closely with a number of human rights focused non-profits, charities and international NGOs, providing them with pro bono advice, assistance and representation, as well as assisting to draft amicus briefs, representing individuals who have experienced breaches of their human rights, undertaking comparative research projects to support advocacy work, and helping to collect evidence and document human rights violations to underpin justice and accountability efforts. For more information about our pro bono programme, please see our website: <https://www.orrick.com/en/Community/Pro-Bono>.

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 small 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 will subject 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.

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 risk 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 maintain our high ethical standards

We have set out below some of the keys steps we will be focusing on in the financial year 2022/23:

- Review and update our existing modern slavery risk assessment and supplier questionnaire;
- Continue to train relevant personnel on how to implement our policies and help them identify and mitigate modern slavery risk; and
- Review Orrick's major supplies to confirm that those suppliers in particular risk areas have appropriate modern slavery provisions in place.



Mark Beeley

Office Leader

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

26 August 2022