

Anti-Slavery and Human Trafficking Statement

Introduction

Shearman & Sterling is committed to acting ethically and with integrity in all its business relationships, and to addressing slavery and human trafficking in all its forms, including (without limitation) slavery,¹ servitude² or forced labor³ (together "**Slavery and Human Trafficking**").

This statement relates to Shearman & Sterling LLP and its affiliated entities, including Shearman & Sterling (London) LLP, a limited liability partnership organised under the laws of the State of Delaware for the practice of law in the United Kingdom and authorized and regulated by the Solicitors Regulation Authority, and Shearman & Sterling, a partnership organised under the Hong Kong Partnership Ordinance and registered with the Law Society of Hong Kong for the practice of law in Hong Kong (together "**the Firm**", "**us**", "**our**" or "**we**").

In accordance with section 54 of the Modern Slavery Act 2015, this statement is made by Shearman & Sterling (London) LLP. It sets out the steps taken by the Firm in relation to the period 1 January 2022 to 31 March 2023 (the "**Relevant Period**")⁴ to combat Slavery and Human Trafficking occurring in its business or supply chains.

Organization structure and supply chains

The Firm

The Firm is a global, full-service law firm headquartered in New York with offices in the United States, the European Union, the United Kingdom, Japan, China, Hong Kong, the UAE, Brazil, Singapore and Canada. The Firm advises its clients in a broad range of specialisms, including Antitrust, Capital Markets, Finance, Funds, Mergers & Acquisitions, Private Equity, Project Development & Finance, Real Estate, Tax, Regulatory, Litigation and Arbitration.

As a legal professional services organization, the Firm is strictly regulated by the various professional regulatory bodies in the jurisdictions in which it operates. The Firm's lawyers are directly regulated by their relevant legal professional body or bar association.

Shearman & Sterling (London) LLP and its employees, together with those Firm lawyers (wherever based) who are admitted in England and Wales, are authorised and regulated by the Solicitors Regulatory Authority (the "**SRA**"). The SRA Standards and Regulations 2019 include fundamental principles of ethical behaviour that all SRA regulated individuals and law

¹ The status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised.

² An obligation to provide services, imposed by the use of coercion.

³ Work that is extracted under the menace of any penalty and on a non-voluntary basis.

⁴ The UK Government has indicated its intention to create a common reporting period for statements published under section 54 of the Modern Slavery Act 2015. The Relevant Period has therefore been adjusted from previous years to align with this change and to ensure there are no gaps in the Firm's reporting periods.

firms must uphold. Other jurisdictions impose similar obligations that govern the Firm's and its lawyer's conduct.

The Firm invests heavily in supporting the wellbeing of its staff and complies with all applicable employment legislation, including those relating to pay. In the UK, the Firm pays its staff and service partners an amount equal to at least the London Living Wage.

Supply Chain

The Firm's supply chains support its ability to run its offices and provide legal services to its clients – primarily, this consists of professional, business support, and goods and service providers. Such providers are either engaged on a global scale or are local to a particular jurisdiction.

A review of the key suppliers for Shearman & Sterling (London) LLP indicates the London Office's largest spend (including contractors) are on property, human resources, office facilities support and professional service providers. Other key suppliers provide training services, library and knowledge services, insurance, hospitality services, telecommunications and information technology.

Policies in relation to Slavery and Human trafficking

The Firm operates a number of internal policies to support its commitment to combatting the risk of Slavery and Human Trafficking within its business and its supply chains.

- The Anti-Slavery and Human Trafficking Policy sets out its commitment to acting ethically and with integrity in all its business relationships.
- The Vendor Management Policy is designed to assist the Firm to assess and manage the risks associated with the use of vendors.
- The Global Raising Concerns Policy encourages staff to speak up if they believe or suspect any wrongdoing in connection with the Firm's business. Staff may raise concerns confidentially, in the knowledge that their report will be investigated and addressed in the appropriate manner. This policy also contains whistleblowing procedures, where permitted / required under relevant law.

The Firm has robust employment and labour policies that support its dedication to fostering a safe and supportive working environment. These include policies on equality and non-discrimination, which demonstrate the Firm's commitment to a fair, ethical, and inclusive workplace

Other key policies relevant to the Firm's approach in this area include the Global Anti-Bribery and Corruption Policy, the Anti-Money Laundering, Counter-Terrorist Financing, Proliferation Financing, Sanctions and Proceeds of Crime Policies, Controls and Procedures, and the SRA Regulatory Reporting Policy.

These policies are available via the Firm's intranet. They are reviewed, and where necessary, updated, on an annual basis or in response to changing law, regulation or industry best practice.

Due Diligence Processes and Key Performance Indicators

The Firm places a high value on acting ethically and with integrity across all areas of its business and it calls for its suppliers to share these standards. The Firm expects those it does business with to comply with their own regulatory obligations within their business operations or supply chains, and it has adopted a number of procedures to reduce the risk of Slavery and Human Trafficking occurring within its own supply chains.

- The Firm's vendor management program is designed to assist the Firm to assess, screen and monitor its vendor population. This is done through a mixture of screening, contract negotiation and ongoing engagement and monitoring of the Firm's vendors;
- The Firm carries out an annual review of its key population of suppliers providing goods and services to its London office, and sends out annual communications to such suppliers to ensure they are aware of the standards expected of them in the context of Slavery and Human Trafficking; and
- The Firm's standard vendor terms include a contractual right for the Firm to audit its suppliers and to meet with them at least annually.

While the Firm recognizes that its most significant risk of exposure relates to its supply chain, it has not identified any cause for concern in this respect.

Training

Training and awareness is a key tool to reduce the risk of Slavery and Human Trafficking.

In the Relevant Period, mandatory annual Slavery and Human Trafficking training was provided on a global basis to members of staff with procurement responsibilities. This included where the individual had substantial engagement with suppliers on behalf of the Firm, even if the onboarding of suppliers and/or the procurement of goods or services on behalf of the Firm is not a formal part of an individual's role.

The training was designed by the Firm, and refers to the Firm's policies and procures which are relevant to the issue. It also contains questions at the end to test knowledge and understanding. During the Relevant Period, the format in which the training was delivered was enhanced in order to improve its effectiveness and reach. Excluding staff departures and long-term leave, all staff required to undertake the training did so within the Relevant Period.

Key Progress and Priorities

Throughout the Relevant Period, the Firm has made significant progress in updating a number of policies and procedures which will, amongst other objectives, assist in reducing the Firm's risk of exposure to Slavery and Human Trafficking. The outcomes of these are expected to form a key part of its Slavery and Human Trafficking program going forward.

- *Vendor Management Project:* The Firm continues to progress its vendor management project to enhance the way in which vendors are screened, onboarded and managed during the life of the relationship with the Firm. During the Relevant Period, the Firm has made significant improvements to the overall contract management process and

established a cross discipline contract management lifecycle working group, updated the vendor terms and conditions for Firm contracts, enhanced the Firm's assessment of vendor risks with an updated engagement questionnaire, and improved the percentage of contracts loaded into the contract repository by over one hundred percent.

- *Supply Chain Management:* The Firm has updated the correspondence which it sends to key suppliers, and expanded the list of suppliers who will receive this correspondence; and
- *Raising Concerns:* The Firm has continued to evolve its existing policies with regards to the raising of concerns.

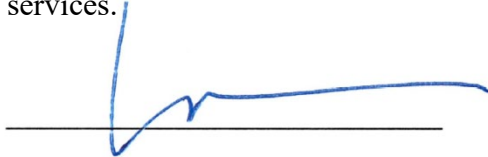
Risk Assessment and Management

The Firm reviews its assessment of the risks of Slavery and Human Trafficking occurring within its business and supply chains on an annual basis.

As a professional services organization, the Firm considers the risk of Slavery and Human Trafficking existing within its business to be low.

The Firm's key suppliers are primarily professional, business support, goods and service providers who are engaged to support the running of the Firm to provide legal services to its clients. Where suppliers are based in a jurisdiction the Firm considers to be of increased risk for Slavery and Human Trafficking, additional due diligence is conducted in order to mitigate the risk presented by these suppliers.

The Firm acknowledges the need for constant vigilance to the risk of Slavery and Human Trafficking in each jurisdiction in which it operates and from which it procures goods and services.



By: William J.F. Roll III.
On behalf of Shearman & Sterling (London) LLP