Statement on Slavery and Human Trafficking

This Statement was issued on 28 June 2022 on behalf of White & Case LLP, a New York state registered limited liability partnership, White & Case LLP and White & Case (Europe) LLP, limited liability partnerships incorporated under English law and White & Case EMEA Services Limited, a private limited company incorporated under English law. This Statement constitutes the slavery and human trafficking statement for the financial year ended 31 December 2021 (the **"Statement"**) for those White & Case entities, and it was reviewed and approved by White & Case's Executive Committee on 28 June 2022 in accordance with the provisions of Section 54(1) of the UK Modern Slavery Act 2015.

1. Introduction

Integrity and service are core values of our Firm. We are proud to be a signatory to the United Nations Global Compact ("UNGC"). Our affirmation of the ten principles of the UNGC is appended <u>here</u>.

We are committed to responsible business practices protecting human rights. We have adopted a zero tolerance approach to all forms of slavery and human trafficking ("**modern slavery**") in our organisation and supply chain, and we are focused on identifying, reporting and addressing any human rights risks or abuses in our operations or our supply chain.

2. Our business and supply chains

White & Case is a global law firm comprising the four entities referred to above and their related partnerships and associations (the "**Firm**"). Our business activities centre around the provision of legal services to clients globally. Please click <u>here</u> for a list of our offices and the jurisdictions in which we operate.

Our key suppliers are businesses that provide the goods and services we need (i) to operate our offices; and (ii) to support the provision of legal services to our clients.

Our Responsible Business Working Group (with input from the Global Citizenship, People and Procurement departments and the Firm's General Counsel Office) is tasked with ensuring the risk of modern slavery is minimised in our business and supply chains.

3. Policies

Our annual report for the UNGC demonstrates our commitment to protecting internationally recognised human rights and labour laws. Please click <u>here</u> for our 2022 Communication on Progress for the UNGC.

We have internal policies and procedures that demonstrate our commitment to eradicating the risk of modern slavery in our business and supply chain. These include Procurement, Health and Safety and Equal Opportunity policies. Our Whistleblowing policy encourages personnel to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously, investigated promptly and that their confidentiality will be respected,

consistent with adequate investigation and remediation. These policies are made available to all our employees through our intranet. Furthermore, we support the health and financial needs of our employees at different stages of their lives by providing a flexible benefits programme.

Key progress

Since 2015, White & Case has participated in annual assessments with EcoVadis, the world's largest provider of business sustainability ratings that uses a methodology aligned to international standards. Each year we submit evidence of our progress on labour and human rights, ethics, environment and sustainable procurement, which includes sharing relevant internal policies and results in a scorecard outlining strengths and areas of improvement.

In 2021, our supplier code of conduct was shared more broadly with our supplier base. It was included as part of requests for proposals to vendors and referenced in our standard terms and conditions. In addition, we completed reviews of over 400 vendors in our supplier risk platform.

4. **Risk assessment and due diligence**

Our business

As a professional services firm regulated in the various jurisdictions in which we operate, we have assessed the risk of modern slavery to be low in our operations. We support public accountability and transparency and are committed to reporting and regularly reviewing our assessment to ensure that we are continually improving our practices.

We confirm that we have in place systems to ensure full compliance with relevant labour laws relating to employee terms and conditions, including pay.

Our supply chain

We expect our suppliers to share our values, but we recognise that there is a risk of modern slavery in our supply chain, particularly in the higher risk jurisdictions in which we operate. Therefore, we continue to enhance our robust supply chain compliance programme, which focuses in particular on suppliers in those higher risk jurisdictions. Our supply chain compliance programme:

- imposes contractual obligations on key suppliers, with obligations related to compliance with relevant laws (including those related to modern slavery) and requirements to impose similar standards on their suppliers;
- requires new key suppliers to provide us with pertinent information to help us determine the risks to us in entering into a business relationship with them;
- requires our key suppliers to provide information on what policies they have in place to address modern slavery risks in their business and supply chains;
- provides for monitoring of the jurisdictions in which our key suppliers operate to identify any risks and conducting market reviews of key services by a formal tender process, with an emphasis on the values that matter to us; and

• provides a contractual right to audit the performance and working practices of our key suppliers.

Key progress

The Firm's Business & Human Rights Interest Group continues to support our lawyers in providing assistance to our commercial clients on the legal and reputational risks and opportunities they face in addressing human rights issues in their operations and supply chains. This Group provides support to colleagues who have a modern slavery or human rights element as part of their mandate, and have incorporated human rights due diligence for capital markets transactions, for example.

Our Responsible Business Working Group undertook a risk assessment of our internal operations. We identified high risk areas, like real estate, as well as our top suppliers and conducted a review of the contracts we have in place. We completed a risk assessment of our current top 400 suppliers and implemented appropriate contract language with many of our top 200 suppliers.

5. Training

The Firm provides a broad range of training designed to increase awareness, knowledge and skills around identifying, addressing and/or preventing modern slavery risks.We provided Responsible Business – Anti-Bribery, Corruption and Modern Slavery Commitments Training to select Firm partners and Business Service managers involved in managing our supplier relationships at the Firm.

Our Business & Human Rights Interest Group has also supported the roll-out of practice area training on ESG, business and human rights for each of the Firm's major practice areas, tailored for each region. For information about the group, please visit www.whitecase.com/law/practices/business-human-rights.

6. Next steps

Our priorities for 2022 and beyond are as follows:

- Continue with additional training for Firm partners and employees who are involved in managing our supplier relationships across our Firm, to enable them to recognise risk factors more easily.
- Proceed with further steps necessary to finalise our Global Code of Conduct.

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Oliver Brettle

Designated Member, White & Case LLP Member of Executive Committee