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# Statement on Modern Slavery and Human Trafficking

This Statement was issued on 23 June 2026 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 the laws of England and Wales, White & Case EMEA Services Limited, a private limited company incorporated under the laws of England and Wales and White & Case, an Australian general partnership.

This Statement was prepared in consultation with the above White & Case entities and constitutes the modern slavery and human trafficking statement pursuant to section 54(1) of the UK Modern Slavery Act 2015 and sections 14 and 16 of the Australian Modern Slavery Act 2018 for the financial year ending 31 December 2025 (the "Statement"). References to "we", "us" or "our" are references to each of those five entities.<sup>1</sup>

## Introduction

White & Case is a global law firm comprising the five entities referred to above and their related partnerships and associations (the "Firm"). 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. We recognise that addressing modern slavery is an ongoing commitment and we are focused on identifying, reporting and addressing any human rights risks or abuses in our operations or our supply chain.

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 UN Global Compact is set out in our most recent annual Communication on Progress ("CoP") (which can be found [here](#)).

Our efforts are coordinated with various stakeholders within the Firm including, but not limited to, the Procurement team, the Office of the General Counsel, the Responsible Business

Committee and Engagement & Development teams across our various offices.

## Our business and supply chains

The Firm's business activities centre around the provision of legal services to clients globally. Please click [here](#) for a list of our offices and the jurisdictions in which we operate.<sup>2</sup>

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

Our Responsible Business Committee has the mission of elevating the Firm's commitment to Responsible Business and unifying our people through a shared sense of responsibility for our local, regional and global communities. Our Sustainability and Responsible Business and Reporting & Policy teams lead on sustainability and responsible business efforts across our operations, which includes seeking to minimise the risk of modern slavery in our business operations and supply chain. Steps include training roll-out, effective due diligence, policy implementation and contractual obligations imposed on our supply chain.

The Reporting & Policy team has a core membership of our Office of the General Counsel, partners, associates, Procurement team and other business services professionals from across the Firm. Since 2022, we have had a Global Environmental Sustainability Manager to oversee sustainability practices across the Firm. To meet their objectives, the Sustainability and Responsible Business and Reporting & Policy teams also leverage the knowledge of our Sustainability and Responsible Business practices, including their awareness of best practice in different markets around the world. The teams communicate and implement policies within the organisation through use of the Firm's intranet and training. The Firm's relationship with its global suppliers is directly managed by the Procurement team.

## Policies

Our annual UNGC CoP demonstrates our commitment to aligning our operations with the ten principles related to human rights, labour, the environment and anti-corruption, and to doing business responsibly. We are participating in the UNGC's enhanced CoP and completed its standardised questionnaire for our 2025 submission, which can be read [here](#).

We have internal policies and procedures that demonstrate our commitment to eradicating the risk of modern slavery in our business and supply chain. These policies are periodically

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<sup>1</sup> Please note that this Statement is currently under consideration for publication on the Australian Modern Slavery Statements Register by the Australian Attorney-General's Department.

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<sup>2</sup> In Australia, we employed approximately 199 people as at 31 December 2025.

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reviewed and updated in line with international standards and regulations. These include, but are not limited to, the following:

### **1. Procurement Policy**

The Firm's global Procurement policy provides comprehensive guidance for all offices, ensuring uniformity in our supplier engagements across the Firm. This policy serves as a cornerstone in our efforts to maintain consistency in our procurement practices. This policy is owned and maintained by the Office of the General Counsel, who are responsible for its ongoing review and updates.

### **2. Anti-Corruption Policy**

Our Anti-Corruption policy prohibits bribery and sets the expectation that Firm personnel must comply with all applicable anti-corruption laws. The policy integrates measures aimed at identifying and preventing bribery and corruption and is owned and maintained by the Office of the General Counsel, who are responsible for its ongoing review and updates.

### **3. Supplier Code of Conduct**

The Firm's Supplier Code of Conduct establishes a framework that we consider important to managing our supply chain and sets out essential guidelines for our suppliers. The Code underscores the Firm's stance in relation to modern slavery, human rights, and other applicable laws. The Code is owned and maintained by the Firm's Procurement team, who are responsible for its ongoing review and updates.

### **4. Anti-Money Laundering & Counter Terrorist Financing Policy**

The Firm's Anti-Money Laundering & Counter Terrorist Financing policy stresses the significance of the Firm's compliance with applicable laws, and outlines our client onboarding process, client due diligence measures and ongoing monitoring. This policy is owned and maintained by the Office of the General Counsel, who are responsible for its ongoing review and updates.

### **5. Human Rights and Anti-Human Trafficking Policy**

The Firm's Human Rights and Anti-Human Trafficking policy reflects our commitment to respecting human rights consistent with the UN Guiding Principles on Business and Human Rights and our obligations as a signatory to the United Nations Global Compact. The policy applies to all personnel and sets out the steps taken to ensure that modern slavery and human trafficking do not occur in our business operations or supply chain. This policy is owned and maintained by the Responsible Business Committee, who are responsible for its ongoing review and updates.

### **6. Whistleblowing Policy**

Our Whistleblowing policy encourages personnel to promptly report suspected wrongdoing, in the knowledge that their concerns will be taken seriously, investigated promptly and that their confidentiality will be respected to the extent possible. This policy aligns with our commitment to thorough investigation and effective remediation. The policy outlines a process whereby whistleblowers may report any concerns via the Office of the General Counsel or, if preferred, an anonymous reporting web-tool. This policy is owned and maintained by the Office of the General Counsel, who are responsible for its ongoing review and updates.

These policies are made available to all our employees through our intranet and we provide training sessions that refer to, and explain, these policies.

## **Risk assessment, due diligence and remediation**

### **Our business**

As a professional services firm regulated in the various jurisdictions in which we operate, we have assessed and continue to assess the risk of modern slavery in our operations to be low. 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, in each relevant jurisdiction.

### **Our supply chain**

We expect our suppliers to share our values, and 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 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 relevant information to enable us to assess the risks associated with entering into a business relationship with them. This includes information related to their operations and ownership, environmental practices and others;

- requires compliance with our Supplier Code of Conduct, for contracts reviewed by the Procurement team, and suppliers are asked 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;
- conducts market reviews of key services by a formal tender process, with an emphasis on the values that matter to the Firm; and
- provides a contractual right to audit the performance and working practices of our key suppliers.

At present, anti-slavery and anti-corruption provisions are included in all supplier agreements, which are regularly reviewed and updated to ensure continued alignment with evolving legal and ethical standards. This includes language relating to modern slavery, anti-corruption, and broader sustainability and responsible business commitments.

The Firm also notes the following improvements to its supply chain function during 2025, which contribute to enhanced supply chain oversight:

- updates to standard procurement terms including an undertaking related to confidentiality and policies which is completed by supplier personnel; and
- implementation of a third-party supplier tracking tool that allows us to view and keep track of our supplier engagements as well as tracking completion of due diligence.

In 2025, the Firm began preparations for an extensive supply chain risk management programme to be undertaken during 2026, to assess, develop and improve our approach to a range of supplier risks including modern slavery.

This programme includes, amongst other aims:

- the hiring of a third-party consultant to identify any gaps in our current supplier risk analysis; and
- the implementation of a third-party compliance screening tool to support the identification and assessment of modern slavery and broader responsible business risks in the Firm supply chain.

## Remediation

No incidents of modern slavery have been identified within our operations or supply chain, however, should we uncover a potential case of modern slavery in our supply chain, members of the Office of the General Counsel and Procurement team

would work with the supplier to understand the situation and investigate the matter. Where possible, we would work with the supplier to remediate the situation. If this is not possible, we would seek to terminate the relationship in line with the relevant contractual terms. Our Procurement team follows an established escalation and governance process to ensure timely management, investigation and resolution of supply chain issues, including collaboration with relevant internal stakeholders where appropriate, such as the Office of the General Counsel, Responsible Business, Finance and Technology teams. The Firm's Whistleblowing Policy has a tailored EU addenda and is available in several different languages, whilst the anonymous reporting mechanism is accessible to all regardless of location.

## Key Progress and Effectiveness

### Key Progress

Since 2015, the Firm 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 relevant internal policies and our progress on EcoVadis' four pillars of sustainability: labour and human rights, ethics, environment and sustainable procurement and, in response, EcoVadis produces a scorecard outlining our strengths and areas of improvement. We review this scorecard each year and consider actions to make further progress. We have steadily improved our scoring every year since 2015.

We have identified the higher risk areas in our supply chain. Risk is determined both by reference to the categories of services (such as cleaning, catering and construction) as well as the location of the supplier. This analysis helps guide our risk assessment process and appropriate mitigation and prevention measures.

As part of our ongoing commitment to strengthening third-party risk management, our Responsible Business Committee continues to evaluate enhancements to our existing framework.

### Effectiveness and Continuous Improvement

We regularly evaluate the effectiveness of our modern slavery related policies, processes and procedures to ensure that they are continuously improved. This includes analysing and evaluating our disclosures, such as UNGC or EcoVadis, to identify where our scores or responses highlight possible areas for improvement. Some examples of output of the evaluation process are listed above and include further analysis of our higher risk areas.

Our Procurement and Responsible Business teams actively participate in roundtables and benchmark against their peers,

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which provides valuable insight into sector trends, best practices, and evolving expectations in areas such as responsible sourcing, sustainability and modern slavery risk mitigation.

The Firm's approach to horizon scanning is supported by the Responsible Business Committee which monitors developments in applicable legislation, regulatory guidance and sector best practice in order to ensure that the Firm's modern slavery programme remains current and effective. The Firm is also building out its sustainability function, including the appointment of additional personnel.

## Training and Awareness

The Firm's Business & Human Rights lawyers continue to support our clients in providing assistance on the legal and reputational risks and opportunities they face in addressing human rights issues in their operations and supply chains. This group also provides support on modern slavery or human rights issues as part of mandates, including human rights due diligence for a range of transactions.

The Firm provides training focused on the importance of ethical recruitment processes and promoting fair employee relations. This training aims to equip recruiters, interviewers and supervisors with a thorough understanding of fair hiring practices and workers' rights. By doing so, the training ensures that all recruitment and employee relations activities are aligned with the Firm's strong commitment to human rights and ethical standards.

The Firm provides a broad range of internal training designed to increase awareness, knowledge and skills around identifying, addressing and/or preventing modern slavery risks. All new joiners to the Firm are required to complete Anti-Bribery & Corruption training as part of their onboarding. Additional tailored training is then provided to all employees who are responsible for purchasing decisions. This training focuses on the importance of the Firm's procurement process and helping people understand supply chain risks related to human rights and bribery.

Our Business & Human Rights Interest Group also supports the roll-out of practice area training on sustainability, and responsible business and human rights for each of the Firm's major practice areas, tailored for each region. The Firm also continues to review its training initiatives for the Operations team and Procurement team.<sup>3</sup>

These initiatives are all reflective of the Firm's ongoing commitment to strengthening awareness and capability across all practice areas and regions.

## Next steps

Our priorities for 2026 and beyond are as follows:

Short-term (2026):

- Update training for employees and contractors who are involved in managing our supplier relationships across our Firm, to enable them to recognise risk factors more easily;
- Continue to review opportunities to improve our EcoVadis score;
- Continue to participate in the UN Global Compact's enhanced CoP;
- Continue to monitor and assess the risks in our supply chain and operations through our supplier risk management program; and
- Continue to evaluate our key supplier relationships and expand our supplier risk assessment process to those suppliers in higher risk categories and jurisdictions.

Medium-term (2027 and beyond):

- Continue to build out the Firm's Sustainability and Responsible Business function and horizon scanning capacity, including by reference to developments in applicable legislation and best practice guidance, and to reflect those developments in the Firm's procurement and due diligence processes;
- Continue enhancing supplier monitoring and audit procedures for suppliers operating in higher-risk categories and jurisdictions; and
- Continue developing centralised supplier due diligence, onboarding and monitoring processes through the Firm's procurement and supplier management systems.

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<sup>3</sup> For information about the group, please visit <https://www.whitecase.com/law/practices/business-human-rights>.

The statement was reviewed and approved by White & Case's Executive Committee, as the principal governing body, on 23 June 2026 in accordance with the provisions of section 54(1) of the UK Modern Slavery Act 2015 and sections 14 and 16 of the Australian Modern Slavery Act 2018 (Cth).



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**Oliver Brettle**

Vice Chair on behalf of the Executive Committee

White & Case LLP

A handwritten signature in black ink, enclosed in a thin black rectangular border. The signature is cursive and appears to read "Oliver Brettle".