



Modern Slavery Act Statement June 2022

Introduction

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015. It is published on behalf of Arnold & Porter Kaye Scholer LLP ("Arnold & Porter" or "the Firm") and covers the financial year ended December 2021.

Arnold & Porter is a global law firm with offices in Washington DC, New York, Los Angeles, San Francisco, Denver, Chicago, Houston, Silicon Valley, Newark, Shanghai, Seoul, London and Brussels.

Arnold & Porter is established in the U.S. as a registered limited liability partnership under the laws of the State of Delaware. The Firm operates as a limited liability partnership worldwide, with the practices in London and Brussels conducted by affiliated limited liability partnerships.

Firm policy on slavery and human trafficking

Arnold & Porter has developed an [Anti-Slavery Policy](#) which is circulated to all staff and published on the internet. This sets out Arnold & Porter's commitment to take steps to reduce the likelihood that slavery and human trafficking occurs in its business or in its supply chains. The policy emphasizes the need for all staff to be aware of the risks of slavery and human trafficking occurring and explains how and to whom any concerns should be reported.

Arnold & Porter's supply chain

Starting in 2016, Arnold & Porter commenced a review of suppliers in our supply chain; which review has continued since then in relation to additional suppliers of the Firm worldwide.

In 2021 the review focused on the assessment of new significant vendors within the Firm's supply chain designated as either high or medium risk, based on potential risk factors such as the nature of the organization, the goods or services provided, and geographical origin. Arnold & Porter reviewed the published relevant policies of such newly identified significant vendors, where available, and sent questionnaires to suppliers where such policies were not readily available. Further, the Firm received comprehensive responses from all of the vendors who were sent these questionnaires.

Arnold & Porter continued to incorporate an anti-slavery clause into its master service agreement with vendors and worked to include that clause as part of its overall contract review procedures, especially for vendors in industries considered high risk. This clause requires suppliers and their employees to commit not to engage in slavery or human trafficking and to conduct due diligence of their own supply chain.

Arnold & Porter has continued to work toward more accountable supply processes to better understand who is providing the law firm with goods and services and what mechanisms and processes are in place to increase transparency. Arnold & Porter is implementing a vendor risk assessment process for Firm vendors and continues to review its significant suppliers' identity and level of risk in this area, and to conduct diligence of suppliers' implementation of anti-slavery measures in their businesses.

Training available to staff

Key managers involved in managing recruitment and our supply chains have undergone introductory training on the requirements of the Modern Slavery Act from an external provider. In 2021, Arnold & Porter continued to identify and expand the group of key managers across the Firm who were provided this training; the majority of this group completed the training.

All London Office staff have been provided with training regarding the requirements of the Modern Slavery Act. By the end of 2021, training had been completed by all of the London Office staff.

All staff have been made aware of the Anti-Slavery Policy, and regular reminders of the policy are scheduled. In 2021, Arnold & Porter worked with an external provider to implement a refresher training that reviewed the requirements of the Modern Slavery Act. Key managers who completed the initial Modern Slavery Act Training within the last two years were asked to complete this training. The majority of this group completed the training by the end of the calendar year.

Approval

This statement was approved and signed on behalf of the partnership by Michael Daneker, Co-Managing Partner of Arnold & Porter on June 21, 2022.

Signed: /s/ Michael Daneker

Dated: 21 June 2022