

# Arnold & Porter

## Modern Slavery Act Statement June 2025

### 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 2024.

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

Arnold & Porter is established in the United States 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 and Human Trafficking Policy](#) which is circulated to all partners and employees 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 partners and employees to be aware of the risks of slavery and human trafficking occurring and explains how and to whom any concerns should be reported.

The Anti-Slavery and Human Trafficking Policy is published in the firm’s Handbook, which is provided to all partners and employees, and serves, in part, similarly to a code of conduct for all firm personnel. Among others, Arnold & Porter has policies in place that enhance the firm’s efforts to prevent modern slavery and human trafficking, including but not limited to:

- General Standards of Conduct
  - The firm expects employees to conduct business in a professional, conscientious and ethical manner, to safeguard the rights of both the firm and its employees. The policy notes that there are processes in place to address any alleged violation of firm policies.
- Diversity & Inclusion and Anti-discrimination/Anti-harassment
  - The firm believes that each individual has the right to work in a professional atmosphere that promotes equal opportunity and prohibits discriminatory practices.
- Whistleblowing (including clauses for No Retaliation, Reporting Responsibility, and Reporting and Investigation)
  - The firm requires its lawyers and other personnel to observe high standards of business and personal ethics in discharging their duties and responsibilities to the firm and its clients. This policy establishes procedures for submitting, receiving and handling notifications regarding any action or suspected action taken within or on behalf of the firm that is criminal or otherwise unlawful, unethical or a violation of a firm policy.
- Recording Time Worked/PTO/Pay Procedures
  - Only eligible employees may perform overtime work and must be explicitly authorized to do so. Further, the firm will promptly investigate any unpaid overtime situation brought to its attention to determine whether there has been a violation of this policy.
  - There are procedures in place for employees to report a concern about their paychecks, including impermissible deductions, errors, or missing overtime pay.

## **Arnold & Porter's supply chain**

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

In 2024 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 implemented updates and continues to work towards more accountable supply processes by improving the mechanisms and processes that are in place to increase transparency. Arnold & Porter has implemented a vendor risk assessment process for Firm vendors and continues to review its significant suppliers' identities and levels of risk in this area, and to conduct diligence of suppliers' implementation of anti-slavery measures in their businesses. In 2024, Arnold & Porter expanded the vendor risk assessment process to include vendors hired to support specific clients.

## **Training available to partners and employees**

All London Office partners and employees have been provided with training regarding the requirements of the Modern Slavery Act. By the end of 2024, training had been completed by all new London Office partners and employees.

Internationally, key managers involved in managing recruitment and its supply chains have undergone introductory training on the requirements of the Modern Slavery Act from an external provider. In 2024, Arnold & Porter continued to identify and expand the group of key managers across the Firm who were provided this training. Further in 2024, Arnold & Porter has continued to provide refresher training at least every other year to key personnel.

All partners and employees have been made aware of the Anti-Slavery and Human Trafficking Policy, and regular reminders of the policy are scheduled.

## **Approval**

This statement was approved on behalf of the partnership by Michael Daneker, Global Co-Chair & Partner of Arnold & Porter on June 13, 2025.

Signed: 

Dated: 13 June 2025