

Modern Slavery and Human Trafficking Statement

This statement is made on behalf of Davis Polk & Wardwell London LLP ('Davis Polk', 'we' or 'us') pursuant to section 54 of the Modern Slavery Act 2015 (the 'Act') and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2021. This statement refers to the London office of Davis Polk and any procedures relate to Davis Polk & Wardwell London LLP only.

Our Firm

Davis Polk & Wardwell London LLP is a limited liability partnership formed under the laws of the State of New York and is authorised and regulated by the Solicitors Regulation Authority with registration number 566321.

We are part of an international law firm comprising several different legal entities with offices in New York, Northern California, Washington DC, Sao Paulo, London, Paris, Madrid, Tokyo, Beijing and Hong Kong. We are committed to the highest standards of professionalism, integrity and ethics in conducting our business. We do not tolerate any form of slavery, servitude, forced labour or human trafficking in our business or supply chains.

Our Approach

Our suppliers include IT providers, office cleaning and other facilities management providers, catering, transport, office and stationery equipment and professional services, such as legal counsel, accountants, banks, brokers, insurers and recruitment agencies. We adopt a risk-based approach to monitor our business and suppliers which allows us to allocate resources appropriately and efficiently.

We continue to assess our supply contracts by size and risk profile as part of our existing procurement processes and to consider the risk of slavery or human trafficking being present. Because of the nature of our business (including the fact that we are regulated by the SRA), our robust recruitment process, our existing procurement processes and our straightforward supply chains, we continue to believe that the risk of modern slavery or human trafficking occurring in our business or supply chains is low. To date, we have not discovered any modern slavery in our supply chains.

The main areas of potential risk we have identified continue to relate to the outsourcing of catering, office cleaning, travel services, security and maintenance services. To mitigate this risk we have provided training and appropriate guidance to relevant staff who have procurement responsibilities.

Each year our key suppliers undergo a risk assessment to allow us to determine the level of risk of modern slavery occurring within their business or supply chain. Depending upon the outcome of that process, they may be required to complete a questionnaire which provides us with additional information on the measures they have in place to combat modern slavery. We seek to ensure that our key suppliers monitor their own business and supply chains and comply with relevant legislation.

We acknowledge that the COVID-19 pandemic presented challenges that could have increased the risk of modern slavery in supply chains. However, following our supplier review, we do not believe that this has materially impacted our supply chains. We have continued to use our existing suppliers with whom we have excellent, long-standing relationships, for most services and, where we do plan to take on a new supplier, we undertake a risk assessment.

Davis Polk Training

Davis Polk continues to believe that, in addition to regularly risk assessing our supply chains, to mitigate the risk of modern slavery occurring in connection with our business, the training of our employees is also important. Relevant employees with procurement responsibilities receive regular training which explains the implications of modern slavery, our obligations under the Act and our commitment to fair employment practices. The training is regularly refreshed and is intended to help employees recognise the risks of modern slavery and human trafficking in our business and/or supply chains.

Management Approval

This statement was approved on behalf of the members of Davis Polk & Wardwell London LLP. It will be reviewed and updated annually.



Will Pearce
Partner

on behalf of Davis Polk & Wardwell London LLP

Dated: 11 August 2022