Statement on Modern Slavery and Human Trafficking

This Statement was issued on 27 June 2024 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 for the financial year ended 31 December 2023 (the "Statement") for those White & Case entities. References to "we", "us" or "our" are references to each of those five entities.[1]

Introduction

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.

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 business and supply chains

White & Case is a global law firm comprising the five 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 here for a list of our offices and the jurisdictions in which we operate.[2]

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 Global Citizenship Committee has the mission of elevating the Firm's commitment to Global Citizenship and unifying our people through a shared sense of responsibility for our local, regional and global communities. Our Responsible Business Subcommittee leads on ESG and sustainability efforts across our operations, which includes ensuring the risk of modern slavery is minimised in our business and supply chain. The Responsible

Business Subcommittee has a core membership of our General Counsels, partners, associates, procurement team members and other business services professionals from across the Firm. In 2022, we appointed a Global Environmental Sustainability Manager to oversee sustainability practices across the Firm. To meet its objectives, the Responsible Business Subcommittee also leverages the knowledge of our ESG and Sustainability practices, including their awareness of best practice in different markets around the world. The Firm's relationships with its suppliers are directly managed by the Global 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 new standardised questionnaire for our 2023 submission, which can be read here. We are also a signatory to the UNGC's "Statement from Business Leaders for Renewed Global Cooperation."

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, 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.

2. Anti- Corruption Policy

Our Anti-Corruption policy prohibits bribery and sets the expectation that Firm personnel must comply with all applicable

[1] 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.

[2] In Australia, we employed approximately 170 people as at 31 December 2023.

Anti-Corruption laws. The policy integrates measures aimed at identifying and preventing bribery and corruption.

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.

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 on-boarding process, client due diligence measures and ongoing monitoring.

5. 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.

These policies are made available to all our employees through our intranet and we have a number of 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 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, 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 as well as compliance with our Supplier Code of Conduct;
- 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. This includes information related to their operations and ownership, environmental practices and others;
- 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.

Anti-slavery and anti-corruption provisions are also included in contract renewals and new supplier agreements. We are in the process of reviewing this language and updating it as necessary.

Remediation

If we do uncover a potential case of modern slavery in our supply chain, members of the General Counsel and Procurement teams would work with the supplier to understand the situation and investigate the claim. Where possible, we would work with the supplier to remediate the situation. If this is not possible, we would look to terminate the relationship in line with the relevant contractual terms.

Key Progress and Effectiveness

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 relevant internal policies and our progress on EcoVadis's 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 our key suppliers and completed a comprehensive review using a third party tool. In addition, we began a formal process to collect further information related to our key suppliers and the ESG practices of any new key supplier. This includes gathering information on their environmental practices, human rights policies and compliance with relevant laws.

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) and location of the supplier. This review will help guide our risk assessment process going forward.

Effectiveness

We regularly evaluate the effectiveness of our modern slavery related policies, processes and procedures to ensure that they are continuously improved. The evaluation process will also take into account developing best practice and feedback from third party processes such as the UNGC or Ecovadis. Some examples of output of the evaluation process are listed above and include further analysis of our higher risk areas.

Training and Awareness

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 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 a broad range of training designed to increase awareness, knowledge and skills around identifying, addressing and/or preventing modern slavery risks.

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

In addition, training has been provided to all employees who are responsible for purchasing decisions. This training focused on the importance of the Firm's procurement process and helping people understand supply chain risks related to human rights and bribery.

Next steps

Our priorities for 2024 and beyond are as follows:

- Continue with additional 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;
- Proceed with further steps necessary to finalise our Global Code of Conduct;
- Participate in the UN Global Compact's enhanced CoP;
- Continue to monitor and assess the risks in our supply chain and operations;
- Continue to evaluate our key supplier relationships and expand our supplier risk assessment process to those suppliers in higher risk categories and jurisdictions; and
- Automate the supplier onboarding process to include more robust and relevant questionnaire plus enhanced due diligence checking.[1]

The statement was reviewed and approved by White & Case's Executive Committee, as the principal governing body, on 27 June 2024 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).



Oliver Brettle
Vice Chair on behalf of the Executive Committee
White & Case LLP



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