# **Statement on Slavery and Human Trafficking**

This Statement was issued on 10 June 2019 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 English law. This Statement constitutes the slavery and human trafficking statement for the financial year ended 31 December 2018 (the "Statement") for those White & Case entities, and it was reviewed and approved by White & Case's Executive Committee on 5 June 2019 in accordance with the provisions of Section 54(1) of the UK Modern Slavery Act 2015.

#### 1. Introduction

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 UNGC is appended <a href="here">here</a>.

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.

# 2. Our business and supply chains

White & Case is a global law firm comprising the three entities referred to above and their related partnerships and associations (the "**Firm**"). Our business activities center around the provision of legal services to clients globally. Please click <u>here</u> for a list of our offices and the jurisdictions in which we operate.

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 Responsible Business Working Group (with input from the Global Citizenship, People and Procurement departments and the Firm's General Counsel Office) is tasked with ensuring the risk of modern slavery is minimised in our business and supply chains.

#### 3. Policies

Our annual report for the UNGC demonstrates our commitment to protecting internationally recognised human rights and labor laws. Please click <u>here</u> for our 2019 Communication on Progress for the UNGC.

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 Procurement, Health and Safety and Equal Opportunity policies. Our Whistleblowing policy encourages personnel to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously, investigated promptly and that their confidentiality will be respected, consistent with adequate investigation and remediation. These policies are made available to

all our employees through our intranet. Furthermore, we support the health and financial needs of our employees at different stages of their lives by providing a flexible benefits programme.

#### Key progress

- In 2018, we drafted a supplier code of conduct that outlines the standards, including human and labor rights, we expect from our suppliers. The code is being provided to all new suppliers of material services to the Firm and will be, on a going-forward basis, provided to all new significant suppliers, and they must confirm compliance with the requirements of the code.
- Our supplier vetting process now 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.

## 4. Risk assessment and due diligence

#### Our business

As a professional services firm regulated in the various jurisdictions in which we operate, we have assessed the risk of modern slavery to be low in our operations. 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 labor laws relating to employee terms and conditions, including pay.

#### 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 are in the process of implementing a robust supply chain compliance programme, with additional processes introduced for suppliers in such 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;
- 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;
- 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 a emphasis on the values that matter to us; and
- provides a contractual right to audit the performance and working practices of our key suppliers.

## 2018 progress

In the first quarter of 2018, we launched a Business & Human Rights Interest Group that supports 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.

Our Responsible Business Working Group enhanced its oversight of our supply chain risks by implementing the following initiatives:

- the development of an online supplier vetting portal which will require our legacy key and significant suppliers to make annual environmental, social and governance ("ESG") risk management disclosures; and
- the incorporation of a supply chain and procurement risk analysis into our internal risk management audits.

### 5. Training

The Firm provides annual training on the "Fundamentals of Business & Human Rights for Lawyers" for our lawyers in each region.

The Business & Human Rights Interest Group also offers practice-specific training sessions on business and human rights developments. For information about the group, please visit www.whitecase.com/law/practices/business-human-rights.

# 6. Next steps

Our priorities for 2019 and beyond are as follows:

- Develop and publish our business values/code of conduct.
- Develop additional training for Firm partners and employees and others that work closely with us who are involved in managing our supplier relationships to enable them to recognise risk factors more easily.

Oliver Brettle

Designated Member, White & Case LLP Member of Executive Committee

3