Modern Slavery Statement

Introduction

We are committed to acting ethically and with integrity in all our business relationships. This statement illustrates the steps we have taken during the financial year ending 31 December 2016 to ensure there is no slavery or human trafficking in our supply chains or in any part of our business, together with the further steps we intend to take in the next financial year.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015.

Our Firm

We are an international law firm, providing legal advice to clients based around the world. Shearman & Sterling LLP is a limited liability partnership organized under the laws of the State of Delaware. Shearman & Sterling (London) LLP is a limited liability partnership organized under the laws of the State of Delaware for the practice of law in the United Kingdom and Italy and is authorised and regulated by the Solicitors Regulation Authority. Shearman & Sterling is a partnership organised under the Hong Kong Partnership Ordinance and registered with the Law Society of Hong Kong for the practice of law in Hong Kong. Our firm operates in association with Dr. Sultan Almasoud & Partners for the practice of law in Saudi Arabia.

This statement is made by Shearman & Sterling (London) LLP.

Our Approach

Our primary suppliers are those which provide office and professional support services. We have conducted an initial review of our own business and of our supply chains and have found no cause for concern. In the financial year ending 31 December 2016 we have:

- reviewed certain internal policies in the light of the issues raised by the Modern Slavery Act 2015;
- begun work on implementing a system to enable us to obtain a signed confirmation from each of our primary suppliers that they comply with the provisions of the Modern Slavery Act 2015. This system will allow us to inform our suppliers of the standards we expect them to adhere to in the context of slavery and human trafficking; and
- begun work on a Modern Slavery Act 2015 training programme for each of our employees with primary responsibility for engaging suppliers.

Further Steps

In the financial year ending 31 December 2017 we aim to:

continue the review of our internal policies;

- continue the implementation of our Modern Slavery Act 2015 supplier confirmation system;
- continue the preparation and roll out of our Modern Slavery Act 2015 training programme to key employees; and
- engage further with our offices and suppliers outside the UK to ensure our standards on slavery and human trafficking are enforced globally.

Performance Indicators

We meet formally with each of our primary suppliers at least annually and often more frequently. These meetings provide an opportunity for us to raise concerns and questions, including in relation to issues connected with the Modern Slavery Act 2015. Our standard terms include a contractual right to audit our suppliers.

On behalf of Shearman & Sterling (London) LLP

15 June 2017