

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made by Crowell & Moring U.K. LLP and its affiliate Crowell & Moring LLP (“Crowell & Moring”, “the Firm” or “we”) pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes our modern slavery and human trafficking statement for the financial year ending 31 December 2023.

### OUR VALUES

Crowell & Moring is committed to the highest standards of honesty and integrity in all its legal work and business practices. Integrity is a fundamental part of the Firm’s culture and how we practice law.

Crowell & Moring is committed to upholding these values and this includes taking steps to ensure that slavery and human trafficking are not taking place in our business or in our supply chains.

### OUR ORGANISATION, BUSINESS AND SUPPLY CHAINS

Crowell & Moring is an international law firm with over 600 lawyers in Washington DC, New York, San Francisco, Los Angeles, Orange County, Denver, Chicago, London, Brussels, Doha, and Shanghai. Prior to 18 May 2023, the Firm operated its business in the United Kingdom through Crowell & Moring LLP, a US-based entity organised under the laws of the District of Columbia. On 18 May 2023, Crowell & Moring U.K. LLP, a registered limited liability partnership organised under the laws of Delaware, was incorporated. Crowell & Moring U.K. LLP remains affiliated with, but is a distinct legal entity from, Crowell & Moring LLP.

Crowell & Moring U.K. LLP is authorised and regulated by the Solicitors Regulation Authority (“SRA”) under SRA ID number 8003476. Further information about Crowell & Moring can be found on our website at <https://www.crowell.com/en/legal-notices>.

Crowell & Moring provides legal advice to corporations, financial institutions, governments, individuals, and others across a number of jurisdictions. Our business is an office-based professional services firm. The firm employs professionally qualified and highly skilled people and is strictly regulated by professional bodies in each of the locations in which we operate. The Firm has a Compliance Counsel, who is responsible for the Firm’s internal compliance policies and procedures, including with respect to anti-slavery matters, and a General Counsel who oversees the Firm’s legal compliance. Further, and in line with SRA-regulatory requirements, Crowell & Moring U.K. LLP has appointed a compliance officer for legal practice (“COLP”) who plays a key role in ensuring compliance with all applicable laws and regulations.

Our supply chains consist primarily of goods and services required in order to assist us in providing legal services, and includes categories such as property and office services (including the provision of security, catering, maintenance, and cleaning); IT and technical support; stationery and office supplies; professional services; and business travel. We also work with other law firms, consultants, and experts. We seek to do business only with suppliers who have similar values and ethical standards as ourselves.

Overall, no instances of modern slavery within our business or supply chain were identified during our financial year ended 31 December 2023.

We have assessed that the risk of modern slavery and human trafficking existing within our own business and in our external supply chains as being low.

## OUR POLICIES

As part of our commitment to combating modern slavery and human trafficking, Crowell & Moring's Office of the General Counsel provides an annual Firm-wide instruction on Anti-Modern Slavery and Human Trafficking compliance. In addition, we have a whistleblowing policy which encourages every partner, attorney and employee to report any suspected violation of any policy, legal, or ethical requirement. There are a number of channels of communication available for raising concerns including a confidential hotline which enables concerns to be raised in confidence and without fear of retaliation or reprisals. The Firm also has an anti-retaliation policy for concerns raised in good faith.


## STEPS TAKEN TO COUNTER THE RISK OF MODERN SLAVERY AND HUMAN TRAFFICKING

We undertake risk-based due diligence on third parties as part of the onboarding process, and continue to review suppliers on an on-going basis. Where appropriate, we include vendor clauses addressing modern slavery and human trafficking for applicable vendors. The Firm has investigative guidelines in place for any potential violations. The Firm also enters into anti-slavery agreements with our clients when so requested. These processes complement and work in conjunction with existing policies and procedures to ensure that we reduce the risk of slavery and human trafficking in our business and supply chains.

In 2024, we intend to update our compliance policy manual language and increase the scope of agreements in which we require our pro forma language to be included. We will be increasing the levels of due diligence performed on both new and existing suppliers in relation to modern slavery as appropriate in all the relevant circumstances.

The Firm's General Counsel has overall responsibility for reviewing and update this statement annually.

This statement has been authorised and approved by the Chair of Crowell & Moring's Management Board, on behalf of the members of Crowell & Moring's limited liability partnerships.

Signed:   
Philip T. Inglima  
Chair, Crowell & Moring  
for and on behalf of Crowell & Moring

Dated: 5 March 2024