

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made by Crowell & Moring U.K. LLP (“**C&M London**”) 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 2025.

OUR VALUES

We are committed to the highest standards of honesty and integrity in all of our legal work and business practices. Integrity is a fundamental part of our culture and how we practice law. C&M London 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

C&M London is a law firm based in London. C&M London is a limited liability partnership registered under the laws of Delaware, and is authorised and regulated by the Solicitors Regulation Authority of England and Wales (“**SRA**”) under SRA ID number 8003476.

C&M London is affiliated with, but a distinct legal entity from, the international law firm Crowell & Moring LLP (referred to collectively with C&M London as “**Crowell & Moring**” or the “**Firm**”). Crowell & Moring has over 600 lawyers in Washington DC, New York, San Francisco, Los Angeles, Orange County, Denver, Chicago, Boston, London, Brussels and Doha. Further information about Crowell & Moring can be found at <https://www.crowell.com/en/legal-notices>.

C&M London provides legal advice to corporations, financial institutions, individuals, and others across a number of jurisdictions. Our business is an office-based professional services firm. C&M London employs professionally qualified and highly skilled people and is strictly regulated by the SRA.

Crowell & Moring has a General Counsel’s Office which is responsible for the Firm’s (including C&M London’s) legal compliance and internal compliance policies and procedures, including with respect to anti-slavery matters. Further, and in line with SRA-regulatory requirements, C&M London 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 for us to provide legal services, and include 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 ethics as ourselves.

Overall, no instances of modern slavery within our business or supply chain were identified during our financial year ended 31 December 2025. 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 has implemented internal policies to ensure we are conducting business in an ethical and transparent manner. These include:

- An Anti-Modern Slavery and Human Trafficking Compliance Policy, which sets out the Firm's zero tolerance approach to modern slavery. It provides guidance to staff on how to remain vigilant of potential modern slavery or human trafficking and instructions for reporting concerns.
- A Compliance with Legal, Ethical, and Policy Requirements 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 expressly prohibits all forms of retaliation against individuals who, in good faith, report legal, compliance, ethical or any other concerns.
- A Vendor Management Policy which sets out the Firm's diligence requirements for engaging with third party vendors.

The Firm's Office of the General Counsel provides an annual Firm-wide instruction on Anti-Modern Slavery and Human Trafficking compliance. New additions to the Firm are required to review Firm policies, including the Anti-Modern Slavery and Human Trafficking Compliance Policy.

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. We have investigative guidelines in place for any potential violations and we enter 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.

The COLP has overall responsibility for reviewing and updating this statement annually.

This statement has been approved by the Management Committee on behalf of the members of Crowell & Moring U.K. LLP.

Signed: 

Dated: March 10, 2026

Robert Weekes, member of Management Committee and COLP
For and on behalf of Crowell & Moring U.K. LLP