

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement is made by Crowell & Moring LLP 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 2017.

### **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 the Firm practices 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 chain.

### **OUR ORGANIZATION, BUSINESS AND SUPPLY CHAINS**

Crowell & Moring is an international law firm with over 500 lawyers in Washington DC, New York, San Francisco, Los Angeles, Orange County, London and Brussels. The firm is composed of the US-based entity Crowell & Moring LLP and the London-based entity Crowell & Moring. Further information about Crowell & Moring can be found on our website at: <https://www.crowell.com>.

Crowell & Moring provides legal advice to corporations, financial institutions, governments, 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. We have assessed that the risk of modern slavery and human trafficking existing within our business is low.

Our supply chain consists 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 office supplies, maintenance and cleaning); IT and technical support; stationery and supplies; professional services; and business travel. We also work with other law firms and experts. We seek to do business only with suppliers who have similar values and ethics as ourselves.

### **OUR POLICIES**

As part of our commitment to combating modern slavery and human trafficking, we have introduced a new Anti-Modern Slavery and Human Trafficking Policy. In addition, we have a clear 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.

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

We have introduced a new Anti-Slavery Policy which has been published on the firm's intranet. We are

also developing new policies and procedures to identify and mitigate areas of potential risk in our business. These include:

- developing new due diligence and procurement procedures;
- asking our suppliers to adhere to the same high standards that Crowell & Moring sets itself in relation to fair and ethical employment practices;
- developing a new anti-slavery Code of Conduct for use with our suppliers;
- developing procedures to monitor any areas of risk in our business and supply chains;
- developing procedures to investigate and respond to any reports of modern slavery or reports of violations of our anti-slavery Code of Conduct; and
- introducing anti-slavery training.

These processes will 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.

This statement has been approved by Crowell & Moring's Executive Committee, who will review and update it annually.

Signed: \_\_\_\_\_

Name: George D. Ruttinger

Dated: April 25, 2018

General Counsel, Crowell & Moring  
for and on behalf of Crowell & Moring