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 2019.

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 Europe-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, the firm has an 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

The firm’s Anti-Slavery Policy has been published on the firm’s intranet. This has also been communicated via email within the firm, and personnel are required to certify that they have read the firm’s policies on an annual basis.

In 2019, the firm furthered its initiative to develop strengthened procurement tools and procedures, including standard clauses addressing modern slavery and human trafficking. The firm has investigative guidelines in place for any potential violations.

In 2020, we will be introducing anti-modern slavery training for our personnel who deal with relevant vendors. 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.

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

Signed: [Signature]
Name: [Name]

Dated: March 9, 2020

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