

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

For fiscal year ending 30 September 2023

INTRODUCTION

This statement is made on behalf of Morgan, Lewis & Bockius UK LLP (“Morgan Lewis” or the “Firm”), pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”).

OUR STRUCTURE

The Firm is organised in the United Kingdom as a limited liability partnership (registration number OC378797), and authorised and regulated by the Solicitors Regulation Authority (authorisation number 615176). The Paris office is a branch of Morgan Lewis. The Firm coordinates its activities with Morgan, Lewis & Bockius LLP, a Pennsylvania limited liability company, via a service agreement. The Firm also, from time to time, works with local counsel in many jurisdictions in order to satisfy our clients’ requirements and instructions.

For more information about Morgan Lewis, please visit our website at www.morganlewis.com.

OUR SUPPLY CHAIN AND RISK

Our supply chain is typical for a large global law firm and includes other providers of professional services, many of which are subject to their own regulatory requirements. The Firm’s supply chain also includes other office support services such as information technology, catering, cleaning, security, courier services, and office supplies. We manage our supply chain risk by contracting with well-established businesses with strong reputations for ethical and responsible business practices.

As a provider of legal services, Morgan Lewis is subject to professional and ethical obligations, including those under the UK Modern Slavery Act 2015. In the services we provide, the people we employ, and the suppliers with which we engage, we believe that the risk of modern slavery and human trafficking occurring within our own business is low. That low risk is further ameliorated by our procurement process for evaluating new suppliers and long-standing relationships with the vast majority of our suppliers.

OUR POLICIES AND PROCEDURES

Morgan Lewis has a full suite of policies and procedures designed to help ensure that we provide clients with high-quality legal services in a manner that is consistent with the legal and ethical obligations of the Firm and its lawyers. Our policy framework reflects our strong culture of promoting professionalism and ethical behaviour, commitment to risk management and loss prevention, and stance on upholding and promoting human rights in the conduct of our business. These policies are reviewed regularly and cover a wide range of topics, including but not limited to professional conduct and business ethics, employment practices, lawyer and legal operations, information governance, and firm operations.

We have adopted a Modern Slavery and Human Trafficking policy (the “Policy”), which reflects our zero-tolerance approach to modern slavery and human trafficking anywhere in our own business or in our supply chains. This Policy is routinely reviewed and updated as necessary.

We expect all employees to familiarize themselves with and acknowledge the Firm’s policies and procedures, and act accordingly.

OUR DUE DILIGENCE AND EFFECTIVENESS

As part of our ongoing efforts to identify, monitor, and reduce the risk of modern slavery and human trafficking in our business, we follow a procurement process that includes a regular review of our supplier lists as well as appropriate due diligence checks on existing and potential new suppliers.

During the reporting period covered by this Statement, we have revised our Supplier Code of Conduct and retitled it as the Code of Business Ethics and Conduct for Vendors (the “Code”). The Code continues to reflect our commitment to preventing modern slavery and human trafficking, and the expectations we have of our suppliers in this regard. We expect our suppliers to take modern slavery seriously and to take any necessary steps to ensure that any areas of risk in their organisations and supply chains are properly identified and addressed. We provide a copy of the Code to new or existing suppliers for the Firm at the time of engagement or renewal.

If at any time we identify a risk of modern slavery or human trafficking in our supply chains, we will immediately evaluate and address that risk as appropriate. Our efforts may include engaging in discussions with the supplier at issue, enhancing our due diligence procedures, improving our procurement practices, updating our contractual terms, and/or pursuing industry collaboration.

OUR TRAINING

The Firm’s induction process for all new employees includes training on modern slavery and human trafficking. Through this training, we educate Firm personnel on recognising the risks of modern slavery in our business and supply chains, and encourage them to report any breaches or concerns to the proper parties within the Firm, without fear of retaliation.

We will continue to work on identifying additional training needs to raise awareness about the risks of modern slavery and human trafficking in our business and supply chains.

APPROVAL

This statement is authorised and approved by the Managing Partner for the London office on behalf of the members of Morgan Lewis.

Frances Murphy, Managing Partner

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Date: February 27, 2024

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Our Beijing, Shanghai, and Shenzhen offices operate as representative offices of Morgan, Lewis & Bockius LLP.

In Hong Kong, Morgan, Lewis & Bockius is a separate Hong Kong general partnership registered with The Law Society of Hong Kong.

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