

Modern Slavery and Human Trafficking Statement

Introduction

This statement ("Statement") is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act").

King & Spalding LLP (the "Firm") is a limited liability partnership formed under the laws of Georgia with its primary office located at 1180 Peachtree Street N.E., Atlanta, GA 30309-3521, USA. Together with its affiliate entities around the world, the Firm provides the highest quality legal advice and representation to its clients.

King & Spalding International LLP ("K&S International") is a limited liability partnership formed under the laws of England & Wales with its place of business at 125 Old Broad Street, London EC2N 1AR (registered number OC303151). K&S International is an affiliate entity of King & Spalding LLP.

K&S International is authorised and regulated by the Solicitors Regulation Authority ("SRA"). In accordance with the SRA's rules, K&S International has appointed Ilan Kotkis as its Compliance Officer for Legal Practice ("COLP"). The COLP is responsible for ensuring that K&S International has policies and procedures in place that are designed to ensure compliance with all applicable laws, rules and regulations, including the Act.

The Firm is committed to ensuring that slavery, human trafficking, child labour or any form of abuse of human rights, have no place in or around our business and we reinforce that commitment through this Statement.

Action taken

The COLP has considered the business activities of K&S International in the context of the Act. He has concluded that, in light of K&S International's recruitment and hiring policies in London, the identity of its client base, the nature of its business and its straightforward supply chain, the business of K&S International presents a very low risk of slavery, servitude, forced or compulsory labour or human trafficking. The COLP has concluded that, to the extent that there is any such risk, it would most likely be in relation to the outsourcing of catering, office supplies, office cleaning, security and maintenance services.

The COLP has conducted due diligence of the existing supplier base of K&S International including a review of each supplier's website to identify evidence of a commitment to the elimination of modern slavery. Suppliers that do not display a Modern Slavery Act policy on their website have been contacted and required to confirm their commitment to comply with our Modern Slavery and Human Trafficking Policy ("our Policy").

With respect to any new supplier contracts entered into after 1 November 2018, K&S International will impose a requirement that the supplier must commit to comply with our Policy.

The COLP will continue to review the steps that K&S International is taking to comply with the Act to ensure the elimination of any possibility of slavery in our supply chain and will make any necessary changes to the policies and procedures of K&S International as he deems necessary.

Training

K&S International will deliver a programme of slavery and human trafficking awareness training and training on our Policy to its procurement team and those individuals in its business with responsibility for managing suppliers.

King & Spalding's contribution to broader human rights initiatives

King & Spalding advises on international instruments such as treaties related to human rights, the environment, foreign investment and other matters. We also assist international courts and commissions. Examples include our appointment as independent counsel to the Special Court for

Sierra Leone, following allegations of war crimes against the country's former president, and our litigation and research assistance for the prosecutor's office in the U.N.-assisted Khmer Rouge Tribunal.

This Statement was approved by **Thomas Sprange**, Managing Partner of K&S International and by **Ilan Kotkis**, COLP and Designated Member of K&S International, on 1 November 2018.