

STATEMENT ON SLAVERY AND HUMAN TRAFFICKING

This statement is made by Covington & Burling LLP (“Covington”) pursuant to Section 54 of the UK Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 September 2023.

Our Structure

Covington is a global law firm, which is established as a limited liability partnership in the District of Columbia in the United States. Our legal practice in England and Wales is conducted by an affiliated limited liability multinational partnership, which is formed under the laws of the State of Delaware in the United States. The Delaware limited liability partnership is the reporting entity for purposes of this statement.

To find out more about the nature of our business and key industry sections and service lines, please visit www.cov.com.

Our Business and Supply Chains

We consider the risk of modern slavery and human trafficking within our business to be low, as we operate in the regulated professional services sector. We do not substantially rely on temporary agency or contracted workers, and there are no seasonal fluctuations in our business that necessitate significant changes to our staffing patterns throughout the year.

Our practice in England and Wales typically hires permanent employees on long-term contracts, most of whom are based in the United Kingdom, and none of whom are based in places that were identified to have a high prevalence of modern slavery or human trafficking in the Global Slavery Index 2018. We conduct checks regarding the citizenship or immigration status of all workers – both permanent employees and agency or contracted workers – to ensure that they have the lawful right to work in the United Kingdom.

We also consider the modern slavery and human trafficking risk presented by our supply chains to be low. Many of our suppliers are also regulated providers of professional services, such as barristers, other law firms, or audit and accounting firms (“Professional Services Suppliers”). We do not have complex or intricate supply chains for these engagements.

Suppliers that potentially present a higher level of modern slavery and human trafficking risk include providers of support services such as cleaning, catering, courier, and facilities management or maintenance services (“Support Services Suppliers”). We address the steps taken to mitigate these potential risks in the sections below.

Our Policies and Risk Mitigation Measures

We are committed to respecting human rights in the conduct of our business, and to mitigating the risks of modern slavery and human trafficking in our business and supply chains.

We operate policies and procedures that support our commitment to sustainable business practices and respect for human rights within our own business. This includes our Reporting of Concerns and Anti-Retaliation Policy, which allows employees to raise concerns without fear of retaliation. In addition, our recruitment practices ensure that we hire workers in accordance with applicable local employment laws.

We take a risk-based and proportionate approach to the mitigation of modern slavery and human trafficking risks within our supply chain. As we consider the potential risks associated with our Support Services Suppliers to be higher than the potential risks associated with our Professional Services Suppliers, our supply chain risk mitigation measures generally focus on Support Services Suppliers. We seek to work with Support Services Suppliers that meet our standards and share our values.

Where we identify or receive reports of possible modern slavery or human trafficking within our own business or supply chain, we will seek to respond in a way that protects victims from harm. Where possible, we will work with suppliers to improve working practices that do not meet our expectations, but we may terminate our relationship with suppliers that seriously or repeatedly breach our standards, or that fail to commit to prompt corrective actions.

We are developing a training plan to educate relevant staff to recognize the possible indicators of modern slavery and human trafficking in our business and supply chains, and to monitor the performance of our Support Services Suppliers. We have also invested in third party management and due diligence systems, which enables the firm to monitor our third parties for these indicators.

In furtherance of our goals in this and other areas, we established an independent Compliance Department with a global mandate in 2022 to focus on policy, procedure, and training development. The Compliance Department has since put in place a hotline where firm personnel have the option of reporting concerns anonymously.

Responsibility and Periodic Review

Responsibility for our modern slavery and human trafficking risk mitigation measures ultimately rests with our London-based Compliance Officer for Legal Practice. They will periodically review our risk profile and risk mitigation measures, to ensure that our approach remains compliant with applicable law and consistent with relevant best practices.

Confirmation of Approval

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Covington's modern slavery and human trafficking statement for the financial year ended 30 September 2023. It has been approved by the members of the reporting entity.

James Halstead, Office Managing Partner, London Office

Date: February 13, 2024