

ARNOLD & PORTER KAYE SCHOLER

Modern Slavery Act Statement

June 2017

Introduction

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015. It is published on behalf of Arnold & Porter Kaye Scholer LLP ('APKS') and covers the financial year ended December 2016.

APKS is a global law firm, formed by the merger of Arnold & Porter LLP and Kaye Scholer LLP on 1 January 2017. It has offices in Washington DC, New York, Los Angeles, San Francisco, Denver, Chicago, Houston, West Palm Beach, Silicon Valley, Shanghai, London, Brussels and Frankfurt.

APKS is a registered limited liability partnership under the laws of the State of Delaware. The firm operates as a limited liability partnership worldwide, with the practices in London and Brussels conducted by affiliated limited liability partnerships.

Firm policy on slavery and human trafficking

APKS has developed an Anti-Slavery Policy which is circulated to all staff and published on the internet. This sets out APKS' commitment to take steps to reduce the likelihood that slavery and human trafficking occurs in its business or in its supply chains. The policy emphasizes the need for all staff to be aware of the risks of slavery and human trafficking occurring and explains how and to whom any concerns should be reported.

APKS supply chain

Starting in 2016, APKS commenced a review of suppliers in our supply chain. This review was started with regard to the legacy Arnold & Porter LLP law firm and is being continued in relation to the suppliers of both legacy law firms worldwide.

The review has to date covered around 90% by value of invoices paid by legacy Arnold & Porter LLP to its suppliers. Based on the review, APKS has issued a supplier questionnaire to all suppliers assessed as either high or medium risk, based on potential risk factors such as the nature of the organization, the goods or services it provides, and geographical origin. The answers to those questionnaires are being followed up.

All suppliers will be informed that APKS will not accept any form of exploitation.

APKS is working toward including an anti-slavery clause in its significant supplier contracts, especially for any industries considered high risk. This clause will ask suppliers and their employees to commit not to engage in slavery or human trafficking and to conduct due diligence of their own supply chain.

APKS is working toward more accountable supply processes to better understand who is providing the law firm with goods and services and mechanisms and processes are in place to increase transparency. APKS continues to review its significant suppliers' identity and level of risk in this area, and to conduct diligence of suppliers' implementation of anti-slavery measures in their businesses.

Training available to staff

Specific training is being developed and will be provided to staff involved in managing recruitment and our supply chains. More general awareness training is provided to all staff through induction training sessions, and e.g. regular electronic refresher alerts.

Approval

This statement was approved on behalf of the partnership by Michael Daneke, Co-Managing Partner of Arnold & Porter Kaye Scholer LLP, on June 29, 2017.

Signed:

Dated:



6/29/17