

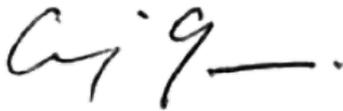
Modern Slavery Act Transparency Statement

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 (the Act).

Sullivan & Cromwell LLP (the Firm) provides the highest quality legal advice and representation to clients around the world. The Firm does business in the United Kingdom through its London office (S&C London) which is authorised and regulated by the Solicitors Regulation Authority (SRA). In accordance with the rules laid down by the SRA, S&C London has appointed one of its partners, Craig Jones, as its Compliance Officer for Legal Practice (COLP). The COLP is responsible for ensuring that S&C London has in place policies and procedures designed to ensure compliance with all laws, rules and regulations applicable to it, including the Act.

The COLP has considered the business activities of S&C London in the context of the Act. He has concluded that, in light of the recruitment and hiring policies employed by S&C London, the identity of its client base, and its straightforward supply chain, there is a very low risk of slavery, servitude, forced or compulsory labour or human trafficking being implicated in the business of S&C London. 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 cleaning, security and maintenance services. Accordingly, the contractors providing those services to S&C London have been requested to provide, and have provided to the satisfaction of the COLP, evidence of the procedures they have in place to comply with the Act.

The COLP will keep under review the steps taken by S&C London to comply with the Act, and will make any necessary changes to the policies and procedures of S&C London as he deems necessary.



Craig Jones
Compliance Officer for Legal Practice

This statement and the modern slavery statements of the contractors outlined above were reviewed on December 17, 2020