

Modern Slavery and Human Trafficking Statement

This statement is made on behalf of Davis Polk & Wardwell London LLP pursuant to section 54 of the Modern Slavery Act 2015 (the 'Act') and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2024.

This statement refers to the London office only and any procedures relate solely to Davis Polk & Wardwell London LLP.

Our firm

Davis Polk & Wardwell London LLP ("Davis Polk", "we" or "us") is a limited liability partnership, formed under the laws of the State of New York. It is authorised and regulated by the Solicitors Regulation Authority (SRA) with registration number 566321.

We are part of an international law firm comprising several different legal entities with offices in New York, Northern California, Washington DC, Sao Paulo, London, Brussels, Madrid, Tokyo, Beijing and Hong Kong.

We are committed to the highest standards of professionalism, integrity and ethics in conducting and managing our business. We have a zero-tolerance approach to any form of slavery, servitude, forced labour or human trafficking (together "modern slavery") in our business and/or supply chains.

Our approach

As an SRA authorised and regulated business, we operate subject to a strict regulatory and ethical framework. This framework, coupled with our policies and processes, and limited supplier network, means that we consider our exposure to modern slavery to be low. What risk there is, exists predominantly in our supply chain.

As a business that provides legal services, we consider the risk of our employees being subject to modern slavery is low. All Davis Polk employees have written contracts of employment and are subject to "right to work checks". We comply with all applicable employment laws.

The London General Handbook ("the Handbook") sets out various employee policies, including those relating to leave (paid and unpaid), disciplinary and grievances, health and safety, and whistleblowing. The Handbook is available to all employees via the intranet.

The main area of potential modern slavery risk we have identified continues to relate to our supply chain. Our supply chain is predominantly focused on running our premises and supporting our business. Our suppliers include IT providers, office cleaning and other facilities management providers, catering, transport, office and stationery equipment providers.

In addition, we may also engage professional services, such as legal counsel, accountants, banks, brokers, insurers and recruitment agencies. Where we engage professional services, many of the relevant suppliers are subject to professional regulation, including their own obligations under the Act.

We continue to assess our supply contracts based on size, value and risk profile. As part of our existing procurement processes, we undertake a due diligence, data collection exercise and consider the potential

risk of modern slavery posed by the supplier. Under our supplier on-boarding process this screening and assessment should be completed prior to execution of the relevant contract. We adopt a risk-based approach to monitoring our suppliers which allows us to allocate resources appropriately and efficiently. We have excellent, long-standing relationships with most of our suppliers.

As in previous years, we have undertaken annual risk assessments of our key suppliers. As part of this assessment suppliers have completed a "Modern Slavery and Human trafficking Supplier Questionnaire". Suppliers were asked questions in relation to their employee base, employee rights and their own compliance with the Act and other applicable laws. Based on the responses provided, we have been able to determine the level of risk of modern slavery occurring within our supply chain. This ensures that our policies and processes remain effective and proportionate against our actual risk.

All responses are saved onto a central register which allows us to track a supplier's potential risk over time. We seek to ensure that our key suppliers monitor their own business and supply chains and comply with relevant legislation.

To date we have not had any incident of actual or suspected modern slavery within our supply chain.

Training

Davis Polk continues to believe that, in addition to regularly risk assessing our supply chains, the training of our employees is fundamental to our ability to properly identify, assess and mitigate the risk of modern slavery occurring in connection with our business.

Employees with procurement responsibilities receive regular mandatory refresher training. The training explains the implications of modern slavery, our obligations under the Act and our commitment to fair employment practices. This training is intended to help employees recognise the risks of modern slavery and human trafficking in our business and/or supply chains.

Management approval

This statement was approved on behalf of the members of Davis Polk & Wardwell London LLP. It will be reviewed and updated annually.

Will Pearce

Partner

on behalf of Davis Polk & Wardwell London LLP

Dated: September 2025