

This statement is made on behalf of Davis Polk & Wardwell London LLP ('Davis Polk' or 'we') 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 2017. This statement refers to the London office of Davis Polk and any procedures relate to Davis Polk & Wardwell London LLP only.

Our Firm

Davis Polk & Wardwell London LLP is a limited liability partnership formed under the laws of the State of New York and is authorised and regulated by the Solicitors Regulation Authority with registration number 566321.

We are part of a global law firm made up of a number of different partnerships with offices in New York, Menlo Park, Washington DC, Sao Paulo, London, Paris, Madrid, Tokyo, Beijing and Hong Kong and are committed to the highest standards of ethical behaviour and professionalism.

Policy/Procedures

We believe that, as a professional services firm, the risk of modern slavery¹ or human trafficking occurring in our business or supply chain is low. Our suppliers include suppliers of IT, office cleaning and other facilities management providers, catering, transport, office and stationary equipment and professional services, such as legal counsel, banks, insurers and recruitment agencies. We have taken a risk-based approach to monitor our business and suppliers which allows us to allocate resources appropriately and efficiently. Our processes include:

- All new suppliers undergo an initial assessment to allow us to determine the level of risk of modern slavery occurring within their business or supply chain. Depending on the circumstances, they may be required to complete a further questionnaire which provides us with additional information on the measures they have in place to combat modern slavery;
- Each year we review the suppliers we have used to determine whether further enquiries should be made; and
- We seek to ensure that all of our suppliers monitor their own business and supply chains and comply with the Act and other relevant legislation and rules.

¹As defined by reference to Article 4 of the European Convention on Human Rights and Appendix A of the Home Office Practical Guidance issued under Section 54(9) of the Modern Slavery Act 2015.

Training

Davis Polk believes that the most effective way for us to prevent modern slavery from occurring in any part of our business is through the training of our employees. Employees receive annual training to help them identify the key issues and indicators of modern slavery and how it should be addressed in our supply chain.

Furthermore, staff who may be involved in the procurement of products or services from third parties have received face to face training explaining the implications of modern slavery, our obligations imposed by the Act and our commitment to fair employment practices. Such staff include our London based IT, human resources, accounts and office services functions.

This statement has been approved on behalf of the members of Davis Polk & Wardwell London LLP.



Simon Witty

Partner/COLP

Dated: 20 February 2018