

Akin Gump LLP Modern Slavery Act 2015 Statement

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 (the “MSA”) and describes the steps which Akin Gump LLP (“Akin”, the “Firm” or “we”) has taken during our last financial year (which ended 31 December 2022) to ensure that slavery and human trafficking is not taking place in any part of our business or our supply chains.

Organisational structure

Akin is a New York limited liability partnership and we operate in association with Akin Gump Strauss Hauer & Feld LLP, the limited liability partnership under which our network operates in the United States and elsewhere in the world (other than England and Wales). The Firm is authorised and regulated by the Solicitors Regulation Authority (number 267321). The Firm is also registered as an overseas entity with Companies House (Company number OE013008). Akin provides legal services from its office in London to clients around the world and has approximately 50 partners and 220 employees.

We oppose slavery and human trafficking in all its forms and do not tolerate it within our own business or within our supply chain.

As a law firm we are subject to professional duties and aspire to the highest standards of ethical behavior and integrity. We are regulated by the Solicitors Regulation Authority (SRA), which requires us to appoint a Compliance Officer for Legal Practice (COLP). The COLP plays a key role in ensuring that our managers, employees and interest holders comply with our regulatory arrangements and applicable laws and regulations, including the MSA.

The Firm's commitments to responsible business, observing high ethical standards and acting with integrity are reflected in our values and policies on equal opportunity and diversity, anti —corruption and also in our pro bono initiatives in defending human rights.

Policies

The Firm has a Modern Slavery Policy which is available to all staff through Akin's intranet. The Modern Slavery Policy demonstrates Akin's commitment to addressing modern slavery, confirms that the Firm opposes slavery and human trafficking in all its forms and does not tolerate modern slavery within its own business or within its supply chain. Personnel are required to notify the COLP if they become aware that a violation of the policy has occurred or may occur in the future. The reporting procedure assists Akin to monitor and review the risks of slavery and human trafficking.

The Firm's whistleblowing policy covers any concerns Firm personnel might have about suspected unlawful or unethical practice within the workplace. The whistleblowing policy encourages employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate.

Diligence, risk and supply chains

As a professional services provider in London which is strictly regulated, primarily employs legal and other skilled professionals and which has a robust hiring and recruitment process, we have assessed the risk of slavery or human trafficking occurring within the Firm's business to be low.

Akin complies with all applicable employment legislation relating to employee terms and conditions, including pay, and we invest heavily in supporting the health and wellbeing of our staff. All our employees earn more than the London Living Wage.

Our supply chain consists of goods and services procured to enable our people to deliver professional services in London. Our key third party suppliers are businesses which supply services related to the running of our office, IT, supplies and professional services needed to deliver our legal services to clients, and our spend is centered primarily in the UK

We expect our suppliers to maintain ethical standards in their workplaces, to treat workers with dignity and respect and to uphold human rights.

As regards the Firm's suppliers, we support a risk-based approach in our diligence, assessment and engagement of suppliers and have taken the following steps:

- Diligence searches (including negative press screening and sanctions checks) are carried out on every supplier to whom Akin makes a payment;
- in relation to existing suppliers, we have pulled relevant data from our internal systems and categorized and reviewed the nature of our vendors' businesses, their position on modern slavery (including whether they have published a modern slavery statement) and other relevant risk factors;
- we previously sought assurances from key suppliers identified by reference to risk factors, including country, sector, impact and annual value of services provided;
- where appropriate, we request certain suppliers to contractually acknowledge their obligations under and compliance with the MSA; and
- we continue to review and develop vendor due diligence and vendor management processes. In particular, the Firm is actively working to design and implement a centralised and comprehensive vendor management system which will provide greater transparency in relation to the firm's supply chains, improve the rigour with which suppliers are assessed and ensure comprehensive record keeping and audit functionality. We have engaged an outside consultant and are in the process of assessing third party IT options to provide a framework for our new vendor management system. In the interim, we have introduced a vendor questionnaire to ensure consistent due diligence and assessment in the context of our vendor relationships.

Training

The Firm provides mandatory online training for all new joiners on modern slavery and preventing exploitation. The Firm previously circulated a mandatory on-line refresher course for all employees which focused on raising awareness of the MSA and the risk of slavery and human trafficking. Video training materials relating to the MSA are available via the Firm's online training platform: 'Raise Your Awareness' and 'Preventing Exploitation'

Further compliance training was rolled out in person and via video recording in 2022. The training included obligations under the MSA and informed partners and employees of contact points to report any concerns about suspected unlawful or unethical practices. Employees have multiple channels through which to raise concerns, including an option to make anonymous reports through the Firm's whistleblower hotlines and web reporting tool.

Review and progress

Akin's policies and procedures relating to the prevention of slavery and human trafficking in our business and supply chains are periodically reviewed by the Firm's compliance committee to ensure appropriate review of priorities and performance.

We intend to continue our work in this area to comply with the MSA and to underscore the values and principles we seek to maintain.

This statement has been approved by the members of Akin Gump LLP.

A handwritten signature in cursive script, reading "Sebastian Rice".

Sebastian Rice
Partner in Charge

For and on behalf of the members of Akin Gump LLP
29 June 2023

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