



Locke Lord LLP Modern Slavery Act 2015 Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Locke Lord LLP is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to minimize the risk of modern slavery in the Firm's own business and in its business supply chains.

Because Locke Lord LLP is a law firm which is regulated in the United States, England and Hong Kong and whose employees are primarily legal and other skilled professionals, the Firm considers the risk of slavery or human trafficking occurring within the Firm's business to be low.

Similarly, because of the types of suppliers used by the Firm, the Firm also considers the risk of slavery or human trafficking occurring within the Firm's business supply chain to be low. The Firm has taken the following steps with respect to its suppliers since June 30, 2018:

- Adopted an Anti-Slavery and Human Trafficking Policy (the "Policy") that provides guidance for conducting due diligence on Firm suppliers and guidance on including anti-slavery and human trafficking prohibitions in certain contracts between the Firm and its suppliers;
- Adopted a Vendor Acceptance Policy that requires internal approval before the Firm can enter into a new business relationship with a vendor. The approval process includes anti-slavery and human trafficking due diligence as required under the Policy in order to identify any potential supplier with a high risk of slavery or human trafficking by reference to its location, type of business and human rights policies;
- Prior to the adoption of the Vendor Acceptance Policy, reviewed the Firm's supplier list to identify any supplier with a high risk of slavery or human trafficking by reference to its location, type of business and human rights policies;
- Sought, and continue to seek, assurances from any such high risk supplier that it does not engage in slavery or human trafficking in the conduct of its business;
- Formulated a training program to train lawyers and staff within the Firm, in particular those with responsibility for contracting with and managing our suppliers, on the risk of slavery and human trafficking; and
- Implemented a practice of requiring new lawyers and staff to review the anti-slavery and human trafficking training materials as part of their orientation to the Firm.

The Firm will continue to raise awareness of the Firm's policy by updating its training program with its lawyers and staff and continuing to work with its suppliers on these issues.

This statement has been approved by the Firm's Executive Committee.

A handwritten signature in black ink that reads "David F. Taylor".

David Taylor
Chair
June 2019