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STATEMENT ON SLAVERY AND HUMAN TRAFFICKING

Opening Statement from Senior Management

This statement is made on behalf of Covington & Burling LLP, a U.K. Multi-National Partnership, pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

We are committed to implementing and maintaining effective systems and controls to prevent modern slavery and human trafficking occurring within our global operations and supply chain.

Our Structure and Supply Chains

Covington & Burling LLP is a global law firm, established in the District of Columbia, that serves clients from offices around the world in London, Brussels, Dubai, Frankfurt, Johannesburg, Beijing, Shanghai, Seoul, New York City, Palo Alto, San Francisco and Los Angeles. Covington & Burling LLP operates in England as a branch of our US limited liability partnership.

To find out more about the nature of our business and key industry sections and service lines, please visit www.cov.com.

Policies

Covington & Burling LLP is committed to respecting human rights in the conduct of our business and to ensuring that there is no modern slavery or human trafficking in any part of our global business and supply chain. Ours is a responsible business that operates ethically and with integrity. We seek to work with suppliers who meet the same strict standards and who share our values.

We operate a number of policies and procedures that support our commitment toward sustainable business practices and respect for human rights, including our whistleblowing policy, which allows employees to raise concerns without fear of retaliation, our Supplier Code of Conduct, our diversity initiatives, and our significant pro bono program. In addition, our recruitment and privacy policies ensure we recruit in accordance with internationally recognised labour standards, and that we retain and process personal data relating to our partners and employees in compliance with applicable laws.

We are in the process of updating and enhancing our Supplier Code of Conduct.

Supply Chains

Our suppliers include providers of office and IT equipment, office cleaning and facilities services, recruitment agencies and professional services from barristers and other professional advisers.

Given our industry, we consider the risk of modern slavery and human trafficking in our supply chains to be relatively low. Nevertheless, we take steps through our procurement process and ongoing supplier interaction to ensure that we engage suppliers that are committed to our values. Our Supplier Code of Conduct details the employment standards demanded of our suppliers; we do not tolerate slavery and human trafficking within our supply chains.

We are committed periodically to reviewing existing suppliers to ensure they meet the requirements of our Supplier Code of Conduct. If responses are deemed unsatisfactory, our continued relationship with them will be reviewed in line with international best practice, including the UN Guiding Principles on Human Rights. Similar impact assessments will be carried out when considering new service suppliers.

Effectiveness and due diligence

We will in future years review our effectiveness in ensuring that slavery, forced labour or human trafficking are not taking place in our global business and supply chains. Going forward, we may include a requirement that our suppliers in turn vet their own suppliers, to ensure that they are meeting their legal obligations as employers and taking appropriate steps to protect their employees, workers and other staff from human rights abuses.

Responsibility for compliance ultimately rests with the members of the LLP and our London-based Compliance Officer for Legal Practice. Our Business and Human Rights team also shares responsibility for assessing and enhancing our efforts to tackle modern slavery and human trafficking on a day to day basis.

Training

We are working internally to develop a training plan to educate our staff to recognize the risks of modern slavery and human trafficking in our business and supply chains.

Training and guidance will be provided for those with procurement responsibilities to assess the human rights and labour performance of suppliers.

Confirmation

This statement is made in accordance with Section 54 (1) of the Modern Slavery Act 2015 and constitutes the Firm's modern slavery and human trafficking statement for the financial year ended 30 September 2019.

Signature:



Office Managing Partner, London Office of Covington & Burling LLP

Date: