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 business 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, Johannesburg, Beijing, Shanghai, Seoul, New York City, San Francisco, Silicon Valley and Los Angeles. Covington & Burling LLP operates in England as a branch of our a US limited liability.

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 upholding and promoting human rights in the conduct of our business. We will ensure that there is no modern slavery or human trafficking in any part of our business and supply chain. Our commitment reflects our values of being a responsible business which 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 only recruit those lawfully permitted to work, and that we retain and process personal data relating to our partners and employees in compliance with applicable laws.

Supply Chains

We regularly audit our supplier lists. 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.

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.
Going forwards, we will periodically review outsourced service suppliers to ensure they are continuing to meet the requirements of our code. If responses are deemed unsatisfactory, our continued relationship with them will be reviewed. Similar 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. Further initiatives 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 ultimate rests with the members of the LLP, and our London-based Compliance Officer for Legal Practice.

**Training**

We are working internally with our training department 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 2016.

Signature:

[Signature]

Office Managing Partner, London Office of Covington & Burling LLP

Date:

1 October 2017.