

Modern Slavery Statement

Updated: September 2023

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) by Cravath, Swaine & Moore LLP (“Cravath” or “the Firm”) and is the Firm’s slavery and human trafficking statement for the most recent financial year.

The Act defines modern slavery as slavery, servitude and forced or compulsory labour and human trafficking. The Firm is committed to ensuring that modern slavery is not taking place in its business or in its supply chains and considers the risk of modern slavery occurring in its business or supply chains to be very low. Despite the low risk, the Firm has taken the actions noted below during the financial year to identify and, if applicable, remedy, any modern slavery risks.

The Firm

The Firm provides premier legal services from its offices in London, New York and Washington, D.C. to clients around the world. It operates under a limited liability partnership formed in the United States. Each of its practice areas is highly regarded, and its lawyers are recognized globally for their commitment to the representation of our clients’ interests. Throughout its history, the Firm has played a central role in developing how law is practiced, how lawyers are trained and how business risk is managed. The Firm’s goal is to be the firm of choice for clients with respect to their most challenging legal issues, most significant business transactions and most critical disputes.

Cravath also has a long-standing commitment to improving the law and the legal system by counseling those unable to afford representation. The full resources of the Firm are brought to bear in support of every pro bono case or transaction. Further, the Firm’s pro bono work addresses a breadth of topics, ranging in size and type, and including work aimed at protecting human rights and eradicating poverty.

Firm Policies and Supply Chains

Cravath is committed to conducting its business and all its relationships based on integrity and without modern slavery. To mitigate modern slavery risks, the Firm maintains an internal Anti-Slavery and Human Trafficking Policy. This policy is designed to educate the Firm’s attorneys and staff (including temporary employees and non-employee consultants) located in our London office on the Firm’s procedures for reducing the risk of modern slavery in our business. It further sets out the Firm’s commitment to acting ethically and with integrity in all its business relationships, including with its suppliers, and provides guidance to the Firm’s attorneys and staff on how to identify and report instances of modern slavery within its business and supply chains.

As set out in the Firm’s Anti-Slavery and Human Trafficking Policy, the Firm seeks to deal only with reputable and well-established suppliers, conducting as necessary risk-based modern slavery due diligence on our suppliers and selectively using anti-slavery contract clauses for suppliers determined to be at greater risk of modern slavery based on our risk assessment.

Additionally, the Firm has several other policies in place to prevent modern slavery, among other abuses of human rights:

- Equal Employment Opportunity Policy (which applies to all our employees (including temporary employees) and non-employee consultants);
- Anti-Bribery and Corruption Policy (which applies to all our partners, retired partners, employees (including temporary employees) and non-employee consultants);
- Whistleblowing Policy (which applies to our employees (including temporary employees) located in the London office; whilst non-employee consultants are encouraged to comply; and
- Policy Against Discrimination and Harassment (which applies to all our partners, retired partners, employees (including temporary employees) and non-employee consultants).

Due Diligence and Risk Management Process

As a supplier of legal services, the Firm operates in a sector which is at a relatively low risk of modern slavery occurring. Despite this low risk, the Firm is committed to ensuring that there is no modern slavery or human trafficking in its supply chains.

In particular, the Firm takes a risk-based approach to reviewing and monitoring its London suppliers and consider its main areas of risk, although low, to be related to its catering, cleaning and goods and service providers. To mitigate any risk in this area, the Firm obtains confirmation or evidence that its London suppliers operate to the required standards, including evidence that the suppliers maintain their own anti-slavery and human trafficking policy. The Firm also undertakes targeted annual checks on any London suppliers who the Firm considers to be at higher risk of potential modern slavery and human trafficking.

Further, the Firm adopts best industry practice and is legally compliant in its own recruitment and employment processes by:

- Ensuring that all job vacancies are advertised appropriately, internally and externally, via official advertising routes;
- Conducting pre-employment checks for all its new employees and partners through an independent identification and employment verification service, which verifies employees’ and partners’ identity and ensures that employees who join the Firm are not subject to modern slavery;
- Ensuring that all its employees have a right to work in the country in which they are based; and
- Working with recruitment agencies that confirm they are compliant with the requirements of the Act.

Training

The Firm provides mandatory training to its London-based partners and employees on the prevention of modern slavery during their onboarding. This training includes a discussion of: facts concerning modern slavery; the Firm’s responsibilities to prevent modern slavery; the impact modern slavery has on individuals and the Firm; areas and industries at higher risk of modern slavery; and sample red flag scenarios. The Firm also provides an annual refresher training for key individuals who have been identified as dealing with any aspect of procurement on behalf of the Firm.

Cravath’s Effectiveness in Combating Modern Slavery and Human Trafficking

Cravath has determined its procedures to be effective based on (i) an open channel of communication to report modern slavery issues, (ii) completion of anti-slavery training by 100% of the Firm’s London partners and employees and (iii) no reports in the most recent financial year by partners, employees, suppliers or other third parties including the general public and law enforcement agencies of modern slavery issues.

This statement was approved on September 1, 2023, and signed on behalf of Cravath by its Partner, Andrew J. Pitts.



Andrew J. Pitts, Partner
Cravath, Swaine & Moore LLP
Dated: September 1, 2023