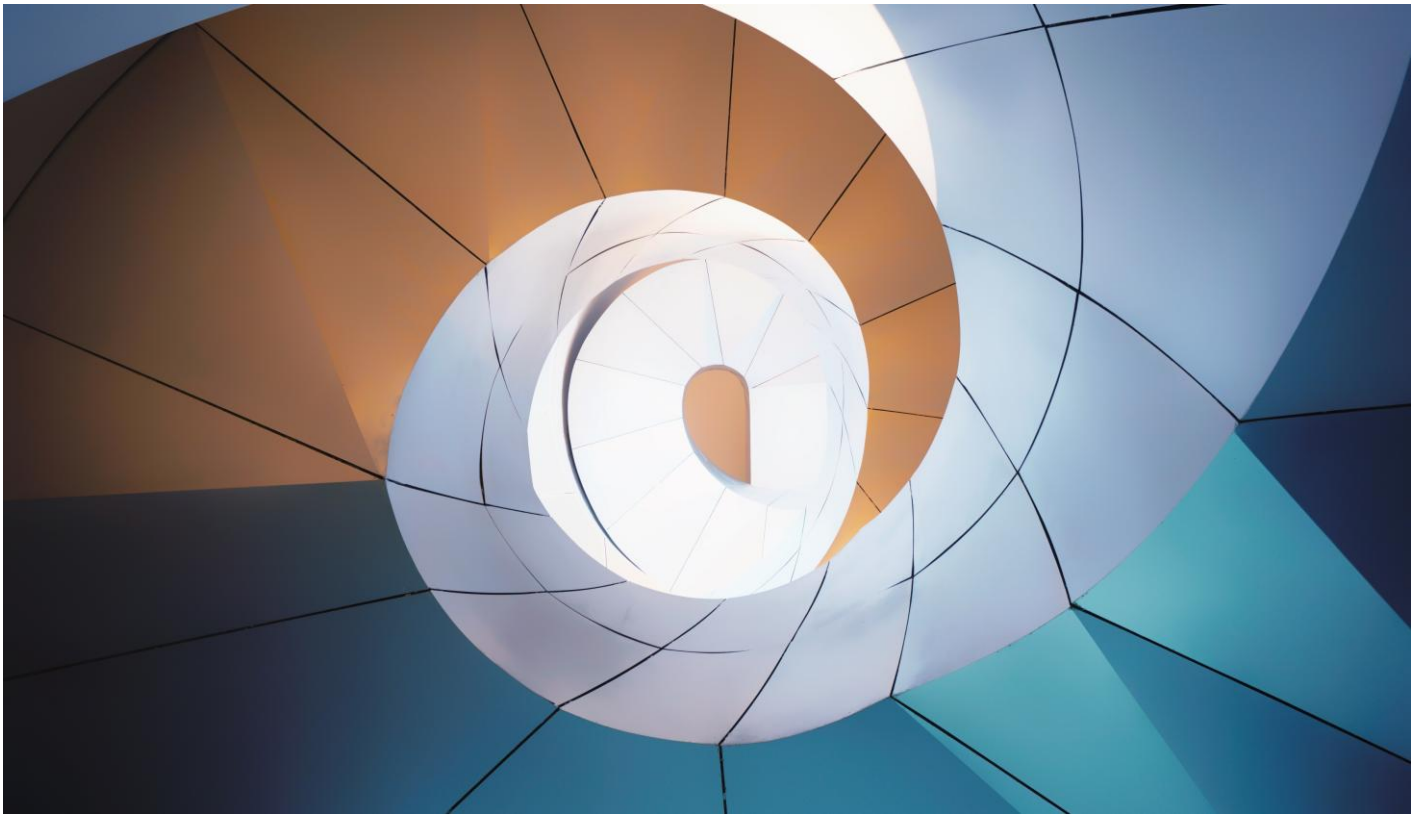
Clifford Chance

Supplier Code Of Conduct

May 2026



Introduction



To achieve our vision and strategy, we are committed to the highest professional and ethical standards, and a culture characterised by integrity, responsibility, accountability and inclusivity.

Our commitment to act responsibly means working collaboratively with our Suppliers and maintaining robust processes, procedures and controls across our end-to-end supply chain. We provide clear guidelines, build trusted relationships and partner with Suppliers aligned to our commitments, encouraging openness and honesty.

Our Supplier Code of Conduct provides the minimum standards we expect from suppliers and contractors (each referred to as a "**Supplier**" hereafter), and their subsidiaries and subcontractors, that provide goods or services to us.*

*We have separate arrangements in place for where we instruct external lawyers.

Our supplier code of conduct

These principles set the minimum standards we expect from all our Suppliers across their end-to-end supply chain.

The Supplier's professional conduct is expected to reflect the following principles:

Compliance

- Comply with all applicable laws, regulations and good industry practice;
- Maintain appropriate policies, procedures and controls to meet contractual obligations and comply with this code;
- Ensure its staff, suppliers, subsidiaries and subcontractors do not breach or undermine this code.

Protect our reputation, clients and data

- Protect personal data, respect individual privacy rights, and maintain confidentiality and safeguard information assets/data against inappropriate disclosure, corruption, loss, theft and/or destruction;
- Use AI responsibly: assess impacts, implement controls that protect confidentiality and privacy, and be transparent about AI use in delivering services to Clifford Chance;
- Retain our data only for as long as necessary to fulfil agreed purposes, in accordance with applicable law and our instructions

Be honest and act with integrity

- Act with integrity and uphold the highest ethical standards;
- Prevent bribery and corruption, money laundering, breach of economic sanctions, facilitation of tax evasion and fraud across business operations and the value chain;
- Follow the payment procedures set out on Clifford Chance's Supplier Management website
- Report unacceptable conduct or concerns to the Global Responsible Supply Chain Team and/or follow our complaints procedure.

Be 'responsible' and show respect for others

- Respect human rights and ensure slavery and human trafficking do not occur in business operations or the value chain;
- Promote equality of opportunity, fair treatment and inclusion across the workforce;
- Adopt and promote ethical business practices;
- Reduce or minimise adverse environmental impacts and support our long-term ambition of becoming net zero.
- Demonstrate a commitment to supporting local and regional communities.

*If any supplier's contract with us, expressly or by implication, amplifies, extends or otherwise varies this supplier code of conduct, the provisions of that contract will prevail, but only to the extent of any conflict.

Our minimum standards

The minimum standards address how those principles should be implemented, the controls our Suppliers should have in place, and how we work together:

01

Compliance

- Health & safety
- People screening & onboarding
- Travel & expense management

02

Protect our reputation, clients & data

- Information security management
- Data privacy
- Use of Clifford Chance's brand
- Business continuity management
- Physical security
- AI Principles

03

Be honest and act with integrity

- Financial crime
- Payment procedure for suppliers

04

Be 'responsible' and show respect for others

- Our approach and commitment to our suppliers
- Human rights & modern slavery

Working with Clifford Chance

As a global law firm, we expect our suppliers to uphold high standards across their operations and supply chains.

01

Compliance

- Meet the expectations in our Supplier Code, proportionate to your size or sector.
- Maintain policies, procedures and training for your personnel to support adherence.

02

Ongoing monitoring and due diligence

- Provide information and assurance regarding performance, including key suppliers relevant to the services provided.
- Where required, complete the annual supplier declaration and participate in audits or assessments.

03

Report and remedy non-compliance

- Notify us immediately of any concerns or issues within your business or supply chain.
- Take prompt action to mitigate and remediate issues as part of continuous improvement.

Clifford Chance

Thank you

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