

OUR CODE

Our Code reflects five key principles and related behaviours that are important to us. As a leading global law firm that strives for excellence, we must apply these principles for our clients, each other, and our respective communities in everything we do.

The Code applies to all of us as one firm. Our Code is meant to help you thrive in our firm and serve our clients best.

We are all role models and together we must all actively strive to live up to the following five principles and be prepared to be accountable to each other for doing so.

- 1. Act with integrity**
- 2. Be inclusive**
- 3. Speak up**
- 4. Embrace challenge**
- 5. Act responsibly**

We have included 'indicative behaviours' in the following pages that help us better understand the principles set out in our Code.

This is a living document, and we expect active engagement with the Code to ensure that it always reflects in the clearest terms who we are, what we can and should expect of each other, and what we value.

1. ACT WITH INTEGRITY

Act with integrity (which is not just about playing by the rules)

Our reputation as a firm and as individuals is built on trust, honesty and integrity. Adherence to strong moral principles and our reputation is the cornerstone on which our business depends.

Each of us, regardless of our actual or perceived seniority or position, plays a critical role in safeguarding the integrity of our business and our reputation.

We are subject to rules, regulations, and standards, in letter and in spirit. If there is a perceived conflict between our Code and professional rules and regulations, we follow the professional rules and regulations. If our Code requires a higher standard than any professional rule or regulation, we follow the Code.

Indicative behaviours:

We:

- do not cut corners;
- prioritise, in all decisions we make, the interest of one firm, not geography, practice or function, and proactively break down siloes;
- are open and encourage openness about mistakes – they are opportunities to learn;
- do not mislead;
- promote a strong compliance culture in the firm through our words and actions;
- are conscious that our duties are owed to the client; in situations where our client is a corporate entity, our duties are owed to the corporate entity and not the individuals who work for the entity;
- ensure that our personal interests do not cloud our judgement in relation to interactions with clients or suppliers and other third parties;
- are transparent in our dealings with regulators and government authorities; and
- do the right thing, including when no one is 'watching'.

2. **BE INCLUSIVE**

Be inclusive and respectful

We are inclusive and celebrate equity and diversity—they are essential for our culture and for our pursuit of excellence. They strengthen our competitive advantage. An inclusive culture and diverse teams allow us to provide more innovative and collaborative work to our clients.

We afford everyone the same respect. We see the value in our differences. Together, we create an environment where all feel welcomed and supported in our work lives – where there are equal opportunities and equal access. We recognise we need to be actively and consciously inclusive if we are to deliver high equality of experience for people.

Any form of discrimination, hate speech, cancellation, bullying and harassment, and other non-inclusive behaviours, have no place at Clifford Chance. We actively work to ensure that our workplace is somewhere where all colleagues can feel safe and supported. This extends to all interactions and modes of communication, including electronic communication and social media.

We recognise that we all have our own biases, but we strive to address these in our decision-making and interactions with others so we can be more inclusive and deliver fairer experiences and outcomes. We always aim to create unity and constructive dialogue, and we work together as one firm, respecting each other's differences and different views.

Indicative behaviours:**We:**

- actively find opportunities to leverage the diversity of our talent to best serve our clients;
- set a good example by treating our colleagues and third parties with dignity and respect, and in the manner we would like to be treated ourselves;
- seek to listen and understand and appreciate that respecting our different points of view make us stronger as one firm;
- are aware of the impact our words and actions can have on others, including those expressed in social media posts;
- are interested in, and demonstrate respect for, cultural differences; and seek to develop our understanding of these differences;
- are mindful of the cultures and preferences of others when organising firm gatherings show an understanding of the difficulties that others may face in their lives which we may not, and show empathy and support for others;
- take the time to get to know the people in our teams, whilst respecting rights to privacy;
- recognise that spending time with colleagues is encouraged for the purpose of team building, but it is also important to be conscious of the fact that, when inviting a more junior colleague to socialise outside of the office (particularly one-to-one), that there may be a power imbalance and in particular it may be difficult for the more junior colleague to say “no”;
- do not participate in gossip and other exclusionary behaviour and do not exclude colleagues from activities because we assume such activities are not for them;
- actively look for opportunities to show appreciation and thank our colleagues for their contribution and to give credit where credit is due; and
- do not engage in intimidating behaviours of any nature or in any form (including physically, socially or online).

3. SPEAK UP

Speak up, contribute ideas and call out unacceptable conduct

We foster an environment where everyone has the freedom and confidence to contribute ideas and to be bold and ambitious in pursuing the goals of our clients and the firm.

We are all encouraged to speak up and to create a working environment in which we can be confident that our concerns and views will be taken seriously.

Our leaders are committed to making us all feel comfortable about contributing ideas and views in relation to the firm, and also to challenge bad behaviour without fear of retaliation, wherever it comes from.

Indicative behaviours:

We:

- proactively raise ideas which deliver value to our clients and the future of the firm;
- actively participate in work discussions, presenting ideas and asking questions;
- build a culture of continuous dialogue with our clients based on respectful and open engagement;
- foster a culture where everyone feels comfortable to speak up with respect and without fear of retaliation;
- are courageous and call out bad, inappropriate, disrespectful, aggressive or unethical behaviour, including bullying, harassment or discrimination (including by clients, service providers and other third parties);
- encourage our colleagues to speak up if they believe they are experiencing bad behaviour and support them when they do; and
- make appropriate reports internally if we consider that an individual within the firm, a client organisation, a supplier or any other third party is acting unethically, inappropriately and breaching the principles of the Code in relation to anyone or any community in the firm.

4. EMBRACE CHALLENGE

Embrace challenge, be open to change and strive for excellence together

We strive for excellence and quality in everything we do. We are prepared to question the status quo. We proactively embrace challenge – no matter what level of seniority or position we are in.

We provide each other with timely, actionable and constructive feedback, so that every member of the team can develop and thrive. Failure to provide genuine feedback is a missed opportunity for everyone.

We always act with courage and conviction, confident in our capabilities, skills and experience. We take ownership and accountability for the firm's success both in the short term and the long term, and embrace change needed to deliver it. We are ready to do things differently, moving forward, innovating and improving.

We are entrepreneurial and often first movers, leading and shaping the market through our vision for the future. We are determined to achieve excellence together in everything we do. We know we are strongest as one global team and that collaboration and team creativity are critical to our success.

Indicative behaviours:

We:

- are open to new ideas, different points of view and to any proposed changes to ways of working (in each case, from all people in the firm regardless of their level of seniority);
- collaborate across teams and offices – discussing problems with colleagues across offices in similar roles to find a common solution;
- put forward suggestions we think could improve the status quo, including by challenging accepted norms, assumptions and language;
- balance risk and opportunity when making decisions;
- ask if we are not sure, air concerns and question assumptions;
- promote and encourage continuous learning;
- advise, listen, are open to questions and concerns from others, and guide when needed;
- try to create positive change by making suggestions and offering solutions whenever we challenge or provide constructive feedback;
- ask for feedback and give constructive feedback on a regular basis;
- continuously look for ways of working to deliver the best possible service to our clients and to make our operations simple and frictionless; and
- embrace new technologies.

5. **ACT RESPONSIBLY**

Act responsibly, in the decisions we make, in how we conduct our business, and towards our stakeholders

As a responsible business we not only uphold our basic responsibilities towards our people, our communities and the environment, but seek to bring positive and lasting impact through the way we operate and through the work we do for our clients.*

This means we consider the impact of our work on our clients and their multiple stakeholders, as well as on the wider community. We promote human rights. We give back to the wider community – including through our pro bono and other community work, programmes for non-governmental organisations, not-for-profit board service and individual and group volunteering activities. We encourage and enable environmentally sustainable practices and minimise our own negative impact on the environment.

**In accordance with the UN Global Compact and the World Economic Forum Stakeholder Capitalism Metrics*

Indicative behaviours:

We:

- are prepared to engage proactively with our clients and the communities in which we operate in relation to environmental and social impacts;
- report evidence of any human rights concern;
- seek out ways to be involved in pro bono and other community activities;
- are disciplined in how we price, invest and spend;
- do not sacrifice long-term value for short-term gain; and
- identify, assess and take steps to avoid and minimise negative environmental impacts associated with our work.

Clifford Chance

This publication does not necessarily deal with every important topic or cover every aspect of the topics with which it deals. It is not designed to provide legal or other advice.

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Clifford Chance has a best friends relationship with Redcliffe Partners in Ukraine.