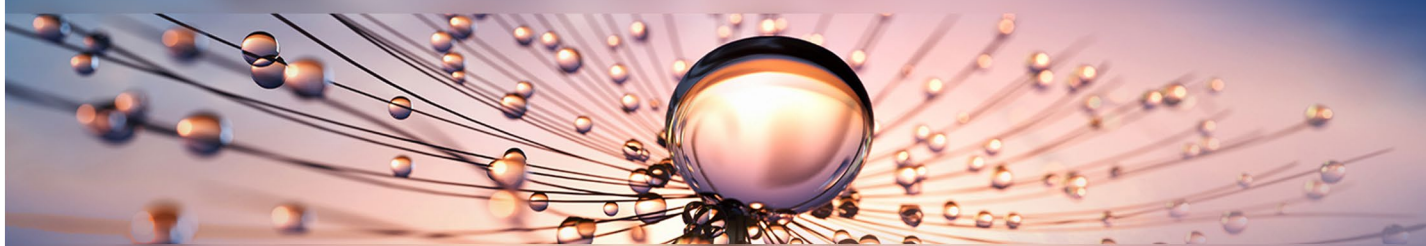


C L I F F O R D
C H A N C E



FINANCIAL CRIME
MARCH 2024

FINANCIAL CRIME

Clifford Chance complies with all applicable anti-bribery, anti-money laundering, economic sanctions, anti-tax evasion and anti-fraud laws (“**Financial Crime Laws**”) and has policies and procedures in place that reflect international best practice and relevant guidance. Our Suppliers are expected similarly to comply with all applicable Financial Crime Laws and to have policies and procedures in place which are designed to ensure such compliance. This Standard outlines the standards Clifford Chance expects in relation to financial crime compliance.

 <p>Compliance</p>	<p>Minimum standards expected of all suppliers</p> <p>The Supplier shall have documented processes and procedures in place to support its compliance with Financial Crime Laws.</p> <p>The Supplier’s financial crime compliance policies and procedures shall be aligned to good industry practice and designed to ensure compliance with applicable Financial Crime Laws.</p> <p>The Supplier shall make such policies and procedures available to Clifford Chance if requested.</p>	<p>Minimum standards expected of high and very high-risk suppliers</p> <p>As per minimum standard for all Suppliers.</p> <p>High or Very High-Risk Suppliers shall provide copies of such policies and procedures to Clifford Chance.</p>
 <p>Contractual requirements</p>	<p>Minimum standards expected of all suppliers</p> <p>The Supplier shall enter into a written contract under which it warrants compliance with Financial Crime Laws and undertakes to comply with Financial Crime Laws in connection with its provision of goods and/or services to Clifford Chance.</p>	<p>Minimum standards expected of high and very high-risk suppliers</p> <p>As per minimum standard for all Suppliers.</p>
 <p>Financial crime risk management</p>	<p>Minimum standards expected of all suppliers</p> <p>The Supplier shall have a process in place to assess and manage its financial crime risks and shall regularly review and update its financial crime risk assessment.</p>	<p>Minimum standards expected of high and very high-risk suppliers</p> <p>As per minimum standard for all Suppliers.</p>
 <p>Anti-bribery compliance</p>	<p>Minimum standards expected of all suppliers</p> <p>The Supplier shall not engage in Bribery, or in any act or conduct that would constitute an offence (or which, if it had taken place in the UK, would constitute an offence) under the UK Bribery Act 2010, or under any other applicable anti-bribery law, or which would lead to any member of the Clifford Chance Group being in breach of any law prohibiting bribery or corruption, including (without limitation) the UK Bribery Act 2010 and the Foreign Corrupt Practices Act 1977, as amended.</p> <p>The Supplier confirms that it does not engage in Bribery, does not direct, authorise or knowingly permit any person who acts on its behalf or performs services for it or on its behalf, to engage in Bribery, and that it shall not, during the time that it is providing goods and/or services to Clifford Chance, engage in, or direct, authorise, or knowingly permit a person who acts on its behalf, or who performs services for it or on its behalf to engage in Bribery in connection with or in any way related to the provision of goods and/or services to Clifford Chance.</p> <p>The Supplier shall have and shall maintain in place during the period in which it is providing goods or services to Clifford Chance, policies and procedures designed to ensure compliance with the Financial Crime Laws.</p>	<p>Minimum standards expected of high and very high-risk suppliers</p> <p>As per minimum standard for all Suppliers.</p>





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 <p>Gifts and hospitality</p>	<p>Minimum standards expected of all suppliers</p> <p>The Supplier shall not give, promise or offer any gifts or hospitality to any person with the intention of improperly influencing a person in connection with Clifford Chance’s business, or in connection with the goods and/or services it is providing to Clifford Chance.</p>	<p>Minimum standards expected of high and very high-risk suppliers</p> <p>As per minimum standard for all Suppliers.</p>
 <p>Public officials</p>	<p>Minimum standards expected of all suppliers</p> <p>The Supplier is not owned, directly or indirectly, by a Public Official or an immediate family member of a Public Official, except as disclosed to Clifford Chance. Ownership, for these purposes, means a beneficial interest of twenty-five (25) per cent or more, and immediate family member, for these purposes, means spouse, child, sibling or parent.</p> <p>The Supplier shall not give, promise, offer or authorise the provision of any benefit or advantage of any kind to a Public Official or an immediate family member of a Public Official, with the intention of influencing a Public Official in his or her official capacity, where not authorised or permitted to do so by written applicable law.</p>	<p>Minimum standards expected of high and very high-risk suppliers</p> <p>As per minimum standard for all Suppliers.</p>
 <p>Charitable donations and political contributions</p>	<p>Minimum standards expected of all suppliers</p> <p>The Supplier shall not make any donations or contributions, either charitable or political, for or on behalf of the Clifford Chance Group, or in any way connected with the provision of goods and/or services to the Clifford Chance Group.</p>	<p>Minimum standards expected of high and very high-risk suppliers</p> <p>As per minimum standard for all Suppliers.</p>
 <p>Anti-money laundering compliance</p>	<p>Minimum standards expected of all suppliers</p> <p>The Supplier shall comply with any applicable anti – money laundering laws or regulations.</p> <p>The Supplier shall not acquire, use, have possession of, conceal, disguise or convert Criminal Property, or enter into an arrangement that the Supplier knows or suspects facilitates the acquisition, retention, use or control of Criminal Property.</p>	<p>Minimum standards expected of high and very high-risk suppliers</p> <p>As per minimum standard for all Suppliers.</p>
 <p>Economic Sanctions compliance</p>	<p>Minimum standards expected of all suppliers</p> <p>The Supplier is in compliance with, and shall continue to comply with, all applicable Sanctions.</p>	<p>Minimum standards expected of high and very high-risk suppliers</p> <p>As per minimum standard for all Suppliers.</p>
 <p>Anti-tax evasion compliance</p>	<p>Minimum standards expected of all suppliers</p> <p>The Supplier shall not engage in tax evasion or other tax crimes, or in any act or conduct that would constitute an offence (or which, if it had taken place in the UK, would constitute an offence) under the UK Criminal Finances Act 2017, or under any other applicable anti-tax evasion law, or which would lead to any member of the Clifford Chance Group being in breach of any law relating to tax crime.</p> <p>The Supplier shall not engage in, facilitate or permit any person who acts on its behalf, to engage in or facilitate, tax crime.</p> <p>The Supplier shall have and shall maintain in place during the period in which it is providing goods or services to Clifford Chance, policies and procedures designed to ensure compliance with tax laws.</p>	<p>Minimum standards expected of high and very high-risk suppliers</p> <p>As per minimum standard for all Suppliers.</p>

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 <p>Anti-fraud compliance</p>	<p>Minimum standards expected of all suppliers The Supplier, and its employees, directors, subsidiaries and subcontractors shall not engage in Fraud or fraudulent practices in connection with its dealings with the Clifford Chance Group.</p> <p>The Supplier has processes in place to prevent Fraud and fraudulent practices, encourages its employees and subcontractors to report any suspicion of Fraud and fraudulent practices, and appropriately investigates all reported instances of suspected Fraud and fraudulent practices.</p>	<p>Minimum standards expected of high and very high-risk suppliers As per minimum standard for all Suppliers.</p>
 <p>Training</p>	<p>Minimum standards expected of all suppliers The Supplier provides risk-based training to its staff on compliance.</p>	<p>Minimum standards expected of high and very high-risk suppliers High or Very High-Risk Suppliers shall provide regular (at least annual) training to their staff on financial crime compliance and shall communicate the content of this Standard to those members of their staff, and any other individuals who are engaged in activities connected with providing goods and/or services to Clifford Chance.</p>
 <p>Subcontractors</p>	<p>Minimum standards expected of all suppliers The Supplier shall seek to use only subcontractors and suppliers which share Clifford Chance’s commitment to complying with Financial Crime Laws.</p>	<p>Minimum standards expected of high and very high-risk suppliers High or Very High-Risk Suppliers shall conduct risk– based financial crime due diligence on their subcontractors and suppliers and shall seek to use only subcontractors and suppliers which share Clifford Chance’s commitment to complying with Financial Crime Laws.</p> <p>High or Very High-Risk Suppliers shall not delegate the provision of services to any third party or subcontractor unless specifically permitted to do so under the terms of an agreement with Clifford Chance.</p> <p>High or Very High-Risk Suppliers shall take steps to procure that each of their subsidiaries and subcontractors shall, throughout the term of any agreement with Clifford Chance, conduct their business in compliance with this Standard and the Financial Crime Laws.</p>
 <p>Reporting</p>	<p>Minimum standards expected of all suppliers The Supplier has a process in place whereby any interested party, including employees, may raise concerns, or report instances of facts or circumstances indicating any actual or potential breach of Financial Crime Laws, and whereby effective steps are taken to identify and address any actual or potential breach.</p> <p>The Supplier shall promptly notify Clifford Chance upon becoming aware or upon becoming reasonably suspicious of any actual or suspected breach of any of the Financial Crime Laws, unless prohibited from doing so by any applicable law, and if it or any of its personnel, its subsidiaries or subcontractors or the personnel of any of its subsidiaries or subcontractors, is put under investigation in relation to, prosecuted for, charged with, or convicted of, any offence under any Financial Crime Law.</p>	<p>Minimum standards expected of high and very high-risk suppliers As per minimum standard for all Suppliers.</p>

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Record keeping and monitoring

Minimum standards expected of all suppliers

The Supplier shall keep a complete and accurate set of records documenting its compliance with this Standard and shall maintain complete and accurate books and records.

Minimum standards expected of high and very high-risk suppliers

As per minimum standard for all Suppliers.

High or Very High-Risk Suppliers shall give access to Clifford Chance to review and/or audit any books or records Clifford Chance reasonably requires in order to monitor compliance by the Supplier with the Financial Crime Laws and this Standard and shall cooperate with and provide any information or assistance reasonably requested by Clifford Chance in connection with any monitoring, review and/or audit that Clifford Chance may at its discretion undertake.

High or Very High-Risk Suppliers shall complete the Clifford Chance Supplier Assessment Questionnaire on an annual basis, or more frequently if reasonably requested to do so by Clifford Chance.

Application and definitions

The standards set out herein shall apply except where requirements under applicable law require a higher standard, in which case the higher standard shall apply. If there is any conflict between the terms of this Standard and applicable law, the applicable law shall apply. If the Supplier has agreed to higher standards under a written contract with Clifford Chance, the higher standards set out in the written contract shall apply.



Glossary of Terms

“**Bribery**” means offering, promising or giving any financial or other advantage, directly or indirectly, to:

- a) any person (1) to induce or reward that person in connection with the improper performance of any activity connected with their business or employment or of their public functions; or (2) where the acceptance of the financial or other advantage by that person would constitute the improper performance of any activity connected with their business or employment or of their public functions; or
 - b) a Public Official, or to any person at the request, or with the assent, of a Public Official, intending to influence a Public Official in their capacity as a Public Official and to obtain or retain business or a business advantage, unless the Public Official is permitted or required to be influenced by the offer, promise or gift by any written law applicable to the Public Official,
- in order (in either case) to retain business for Clifford Chance Group or some advantage in the conduct of Clifford Chance Group’s business.

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Glossary of Terms (continued)

“Clifford Chance Group” means Clifford Chance LLP, any Affiliate of Clifford Chance LLP, any firm anywhere in the world which is Controlled by Clifford Chance LLP or the partners in Clifford Chance LLP, or which trades under the name of or a name including “Clifford Chance” with the authorisation of Clifford Chance LLP, or which is treated as a subsidiary undertaking of Clifford Chance LLP for the purposes of its audited accounts, and includes Clifford Chance Newcastle Limited and the Clifford Chance Global Shared Services Centre currently located in India (for the purposes of this definition “Controlled” or “Control” means, in relation to a person or entity, the direct or indirect ability to direct the affairs of that person or entity, whether by way of contract, ownership of shares, exercise of voting rights, power of attorney or otherwise);

“Criminal property” means property which the Supplier knows, or reasonably suspects, represents the proceeds of crime.

“Financial Crime Laws” means anti-bribery, anti-money laundering, economic sanctions, anti-tax evasion, and anti-fraud laws.

“Fraud” or **“fraudulent practices”** means the use of deception to obtain an advantage, avoid an obligation or cause loss to another party.

“High Risk/Very High-Risk Suppliers” means those Suppliers which have been classified as High Risk or Very High-Risk following Clifford Chance’s supplier risk assessment process.

“Public Official” means an individual who is in a position of official authority conferred by a state, or a national, federal or local government, who holds a legislative, administrative or judicial position of any kind (whether appointed or elected) of a country or territory (or any subdivision of a country or territory), who exercises a public function for or on behalf of a country or territory (or any subdivision of a country or territory) or for any public agency or public enterprise of a country or territory or subdivision thereof, or who is an official or agent of a public international organisation, a candidate for public office, or an official or employee of a political party.

“Sanctions” means any economic or financial sanctions or trade embargoes implemented, administered or enforced by the United Nations Security Council, the European Union, Her Majesty’s Treasury or any other UK government authority, the U.S. Department of the Treasury’s Office of Foreign Assets Control, the U.S. Departments of State or Commerce or any other US government authority.

“Standard” means this Financial Crime Standard which forms part of Clifford Chance’s Supplier Code of Conduct and Supplier Standards.

CLIFFORD CHANCE

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