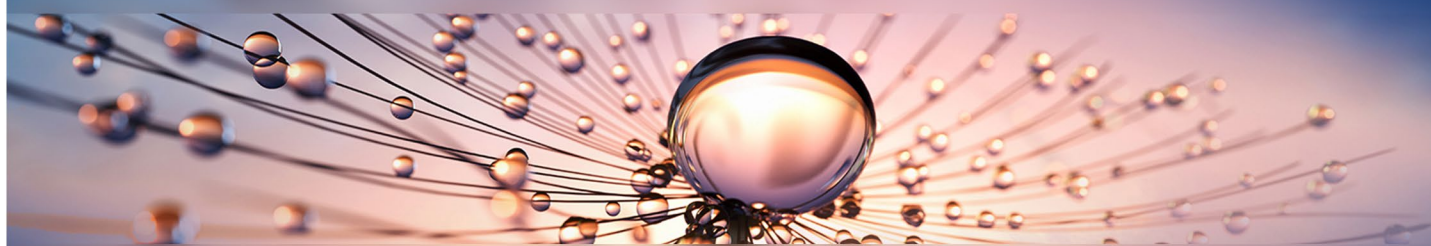


C L I F F O R D
C H A N C E



SUPPLIER CODE OF CONDUCT
MARCH 2024

INTRODUCTION



To achieve our [vision and strategy](#), we must be fully committed to the highest professional and ethical standards, and nurture a culture characterised by integrity, responsibility, accountability and inclusivity.

Our commitment to [act responsibly](#) means working collaboratively with our Suppliers and ensuring the right processes, procedures and controls are in place as part of our end-to-end supply chain.

We believe that by providing a clear set of guidelines, and developing strong and trusted relationships with our Suppliers, we can maintain the high ethical and professional standards we pride ourselves on, and deliver on our social, economic and environmental commitments. We seek to partner with Suppliers who share our commitments and approach, and work with them to ensure they are meeting the principles of our Supplier Code of Conduct. Throughout our relationship, we encourage our Suppliers to be open and honest with [us](#).

Our Supplier Code of Conduct provides a set of key principles that underpin the minimum [standards](#) we expect from the suppliers and contractors (each referred to as a “**Supplier**” hereafter), and their subsidiaries and subcontractors, that provide goods or services to us.*

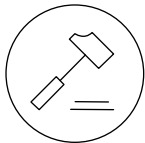
*WE HAVE SEPARATE ARRANGEMENTS IN PLACE FOR WHERE WE INSTRUCT EXTERNAL LAWYERS.

OUR SUPPLIER CODE OF CONDUCT

Outlined below are the key principles that underpin the minimum [standards](#) we expect from all our Suppliers, and which we expect them to promote with their subsidiaries, subcontractors and in their end-to-end supply chain.

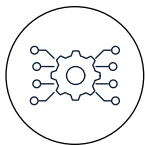
Key Principles – What you need to know

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



Compliance

- Demonstrate compliance with all applicable laws, regulations and good industry practice, including maintenance of policies and procedures designed to support its compliance;
- Comply with contractual obligations; and
- Take steps to ensure its own staff, suppliers, subsidiaries and subcontractors do not undermine its compliance with this code.



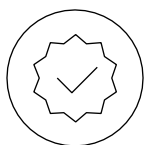
Protect our reputation, clients and data

- Support our commitment to the protection of personal data and respect for individual privacy rights; and
- Maintain confidentiality and prevent inappropriate disclosure, corruption, loss, theft, and/or destruction of our information assets/data.



Be honest and act with integrity

- Conduct its business in a manner that complies with the law and is consistent with the highest ethical standards, including standards intended to prevent bribery and corruption, money laundering, breach of economic sanctions, facilitation of tax evasion and fraud within its business operations and value chain.
- Follow the payment procedures set out on Clifford Chance's [Supplier Management website](#)
- Report any unacceptable conduct observed and/or concerns identified during the period of service delivery to the [Global Responsible Supply Chain Team](#) and/or follow our [complaints procedure](#).




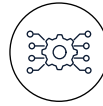




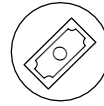





Be 'responsible' and show respect for others

- Respect human rights and ensure that all forms of slavery and human trafficking do not occur in its business operations or value chain;
- Demonstrate a commitment to equality of opportunity, treatment and inclusion through all aspects of its workforce operations;
- Support us in our efforts to promote inclusion within our firm and value chain;
- Adopt and promote ethical business practices;
- Implement initiatives which aim to reduce or minimise adverse environmental impacts and support us to fulfil our long-term ambition of becoming net zero; and
- 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 THE PROVISIONS OF THIS SUPPLIER CODE OF CONDUCT, THEN THE PROVISIONS OF THAT CONTRACT WILL PREVAIL, BUT ONLY TO THE EXTENT OF ANY CONFLICT.

OUR MINIMUM STANDARDS

The key principles address the “ethical behaviour” we expect from our Suppliers. The minimum [standards](#) address how those principles should be implemented, the controls our Suppliers should have in place, and how we work together:

COMPLIANCE	PROTECT OUR REPUTATION, CLIENTS & DATA	BE HONEST AND ACT WITH INTEGRITY	BE 'RESPONSIBLE' AND SHOW RESPECT FOR OTHERS
 Health & safety	 Information security management	 Financial crime	 Our approach and commitment to our suppliers
 People screening & onboarding	 Data privacy	 Payment procedure for suppliers	 Human rights & modern slavery
 Travel & expense management	 Use of Clifford Chance's brand		
	 Business continuity management		
	 Physical security		

WORKING WITH CLIFFORD CHANCE

As a global law firm, we are rightly held to high standards, including within our supply chain. To ensure effective implementation of our Supplier Code and minimum [standards](#), the Supplier is expected to:

Compliance

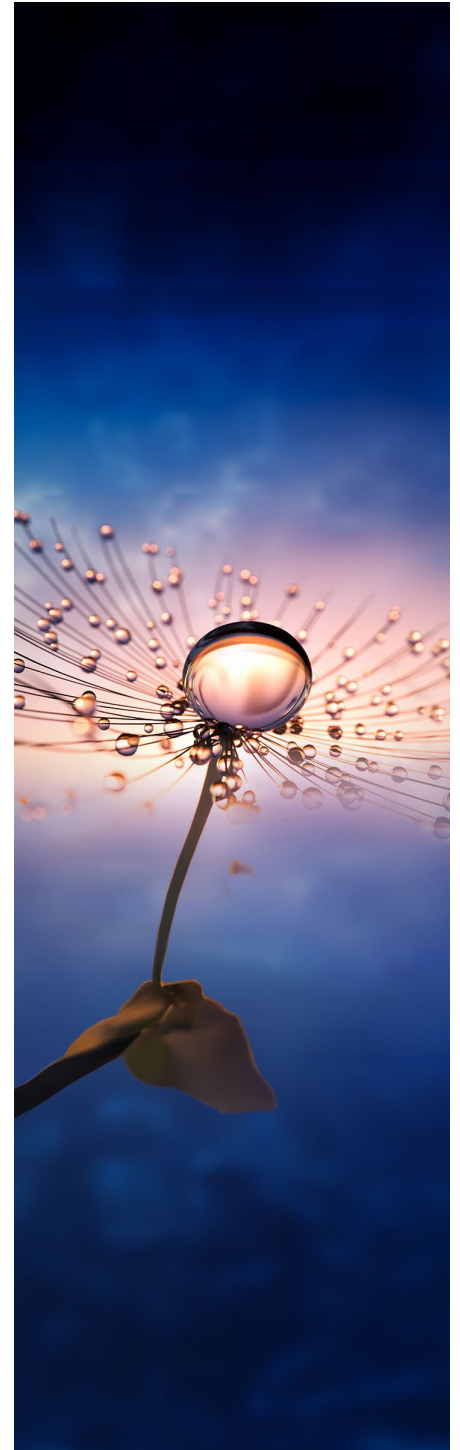
- Meet the expectations in this Supplier Code of Conduct and minimum [standards](#), and/or demonstrate that it has comparable standards in place that are reasonable to its size or industry sector; and
- Maintain policies, procedures and training for its personnel, to promote compliance with the expectations of this Supplier Code of Conduct.

Ongoing monitoring and due diligence

- Provide information and assurance regarding compliance with this Supplier Code of Conduct, including that of its key Suppliers, relevant to the services provided; and
- Where required, complete the annual supplier declaration and participate in audit or due diligence assessments.

Report and remedy non-compliance

- Notify [us](#) immediately if the Supplier has any concerns in relation to its compliance with this Supplier Code of Conduct or minimum [standards](#) and/or identifies any areas of non-compliance within its own business or supply chain; and
- Mitigate any failure to comply with the principles of this Supplier Code of Conduct or the minimum [standards](#) as part of continuous service improvement.



CLIFFORD CHANCE

Document Owner: Procurement

Approved By: Global Head of Procurement

Date Approved: 18th March 2024

Date for Review: March 2025

Version: 1.3

Classification: Public

Clifford Chance, 10 Upper Bank Street, London, E14 5JJ

© Clifford Chance 2024

Clifford Chance LLP is a limited liability partnership registered in England and Wales under number OC323571

Registered office: 10 Upper Bank Street, London, E14 5JJ

We use the word 'partner' to refer to a member of Clifford Chance LLP, or an employee or consultant with equivalent standing and qualifications

www.cliffordchance.com

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.

Abu Dhabi • Amsterdam • Barcelona • Beijing • Brussels • Bucharest • Casablanca • Delhi • Dubai • Düsseldorf • Frankfurt • Hong Kong • Istanbul • London • Luxembourg • Madrid • Milan • Munich • Newcastle • New York • Paris • Perth • Prague • Rome • São Paulo • Shanghai • Singapore • Sydney • Tokyo • Warsaw • Washington, D.C.

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

Clifford Chance has a co-operation agreement with Abuhimed Alsheikh Alhagbani Law Firm in Riyadh.