

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



SUPPLIER CODE OF CONDUCT
MARCH 2023

INTRODUCTION



As a leader in our field we are rightly held to high standards in all we do. We believe that our license to operate, the sustainability of our business and the achievement of our vision are dependent on our ability to inspire trust and earn the confidence of the people we work with. To do this we must act responsibly, and that 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. Further detail can be found in our [Responsible Business Report](#).

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.*

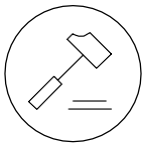
*WE HAVE SEPARATE ARRANGEMENTS IN PLACE FOR WHERE WE INSTRUCT EXTERNAL LAWYERS.

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 chains.

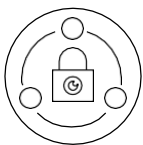
Key Principles – What you need to know

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



Compliance

- Demonstrate compliance with all applicable laws, regulations and good industry practice;
- Comply with contractual obligations; and
- Take steps to ensure its own employees, suppliers, subsidiaries and subcontractors do not undermine.



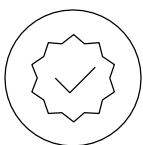
Protect our reputation, clients and data

- 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 and fraud; and
- Take steps to prevent tax evasion within its own firm and its supply chain.









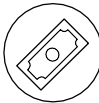





Be 'responsible' and show respect for others

- Respect human rights and ensure no modern slavery;
- Demonstrate a commitment to equality of opportunity and treatment, diversity and inclusion through all aspects of its workforce operations;
- Support us in our efforts to work with a diverse supply base and provide access to a broad talent pool;
- Adopt and promote ethical business practices;
- Implement initiatives which aim to reduce or minimise adverse environmental impacts and support us to fulfil our longer-term aim of being 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 |
|---|--|---|--|
|  <p><u>Health & safety</u></p> |  <p><u>Information security management</u></p> |  <p><u>Financial crime</u></p> |  <p><u>Our approach and commitment to our suppliers</u></p> |
|  <p><u>People screening & onboarding</u></p> |  <p><u>Data privacy</u></p> |  <p><u>Payment procedure for suppliers</u></p> |  <p><u>Human rights & modern slavery</u></p> |
|  <p><u>Travel & expense management</u></p> |  <p><u>Use of Clifford Chance's brand</u></p> | | |
| |  <p><u>Business continuity management</u></p> | | |
| |  <p><u>Physical security</u></p> | | |

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

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