

C L I F F O R D

C H A N C E

OUR COMMITMENT TO PREVENTION OF FACILITATION OF TAX EVASION

OUR VALUES

As a leading global law firm we are rightly held to high standards in all we do. We believe that our licence to operate, the sustainability of our business and the achievement of our aim to be the law firm of choice for the world's leading businesses are dependent on our ability to inspire trust and earn the confidence of our clients and staff and the third parties with which we deal. To do this we must act responsibly and seek to help all of our clients and staff in their future success. This includes having in place measures designed to prevent the facilitation of tax evasion.

BUSINESS AND ORGANISATIONAL STRUCTURE

Clifford Chance is an integrated international law firm which provides legal services across the key markets of the Americas, Asia Pacific, Europe, the Middle East and Africa. We have over 30 offices in more than 20 countries, focusing on the core areas of commercial activity - capital markets; corporate and M&A; finance and banking; real estate; tax, pensions and employment, and litigation and dispute resolution. The firm is led by over 500 partners, with a total headcount of around 6,000 including lawyers and business services staff.

Our principal partnership is Clifford Chance LLP, a limited liability partnership incorporated under English law. In some jurisdictions we practise through this partnership, in others through a local entity which uses the Clifford Chance name. Our practices are supported by a number of wholly-owned service companies. The members, shareholders, partners and directors of all these entities are subject to the governance of Clifford Chance LLP. Each of the offices is managed locally by one of our senior partners, supported by professional managers.

Our supply chains relate to our global office-based professional service business – supplying personnel, goods and services to support the services we in turn supply to our clients. Some of our suppliers are engaged on a global basis; others are local. We seek to establish and maintain relationships with our suppliers with a view to ensuring that all elements of our supply chain act in accordance with applicable laws, our values and ethical business principles.

POLICIES AND ETHOS

Clifford Chance has in place a number of global policies relating to professional and personal conduct, including compliance with laws and applicable professional standards. A number of these are designed to mitigate the risks of financial crime such as tax evasion.

Clifford Chance opposes tax evasion and is committed to taking steps to ensure that this is not facilitated by our partners, employees, agents or third parties that act for us.

Our professional approach is to deliver quality legal advice to our clients and to advise them on their responsibility to comply with applicable laws, including tax laws. Tax evasion is contrary to law and we do not condone, encourage or facilitate it.

DUE DILIGENCE AND RISK ASSESSMENT

In 2017, in response to the provisions of the UK Criminal Finances Act 2017, we reviewed Clifford Chance's business to identify and assess the risks of facilitating tax evasion, the measures already in place to address such risks, and any additional measures that may be warranted in light of the review. As a professional services firm strictly regulated by professional regulatory bodies in each of the jurisdictions in which we operate, and in the light of our existing policies and practices intended to prevent financial crime, we have assessed that we are at low risk of facilitating tax evasion, although we are taking steps through our policies and training in particular to seek to ensure we are alert to possible risks of tax evasion in our business, and prepared to address any that may arise.

We acknowledge that tax evasion is a risk in certain jurisdictions in which we operate, and/or from which we procure goods or services, and accordingly we will remain vigilant as to these risks so as to identify of any relevant issues that may arise, and ensure they are addressed appropriately.

TRAINING AND AWARENESS

We are committed to ensuring that Clifford Chance personnel are equipped to identify risk factors and indicators of possible tax evasion, understand the implications for our business, and react appropriately.

We are developing a mandatory training module for all our lawyers, including all our partners, in relation to the issues tax evasion raises for Clifford Chance and its business – this will build on our existing training around measures to prevent financial crime.

We are developing specific targeted training for groups of our business services staff, such as the teams involved in procurement, in relation to the issues relevant to their areas of work – again this will build on our existing training around measures to prevent financial crime.

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