



Supplier Code of Conduct

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1. **About us**

We are an independent, full-service law firm that works with suppliers across the UK and beyond. It is important that our suppliers share our values, act responsibly and operate in keeping with the standards that we uphold.

2. **About this Code**

This Code of Conduct (**Code**) sets out the minimum standards of behaviour we expect from suppliers.

3. **Minimum standards of conduct**

We expect our suppliers to comply with our minimum standards of conduct (**Standards**). These Standards are listed below under the following headings:

- Compliance with legal and regulatory requirements
- Employees and working conditions
- Environment
- Data protection, privacy and security, and
- Sustainability principles

We expect our suppliers to apply these same Standards to their own supply chain and to treat their supply chain fairly.

4. **Compliance with legal and regulatory requirements**

Suppliers must comply with the legal and regulatory requirements that apply to their products and business operations. If there is a conflict between those requirements and the Standards in this Code, those requirements must be followed.

Suppliers must notify us promptly if they become subject to legal or regulatory action that is likely to impact their trading relationship with us or their or our reputation.

4.1. **Anti-bribery and corruption**

We expect suppliers to have a zero tolerance approach to bribery, corruption and fraud, which includes complying with all applicable anti-bribery and fraud laws and regulations.

We expect Suppliers to have good corporate governance, be transparent and accountable. Suppliers must pay their taxes.

4.2. **Gifts and hospitality**

We accept corporate hospitality where there is a legitimate business purpose and the cost is reasonable and proportionate. However we expect suppliers not to offer or provide cash, or expensive gifts or entertainment to our Staff, and to check with us first if they are in any doubt about what is acceptable to us.

4.3. Money laundering

Suppliers must comply with applicable anti-money laundering laws and regulations.

4.4. Sanctions

Suppliers must comply with applicable sanctions regulations.

4.5. Competition

Suppliers must not engage in anti-competitive practices.

If they have a dominant market position, suppliers must not abuse it to harm customers or competitors.

4.6. Conflicts of interest

We expect suppliers to make us aware of any potential or actual conflicts of interest between them and us or in relation to any relevant third party.

5. **Employees and working conditions**

5.1. Human rights

Suppliers must comply with all applicable standards on human rights.

5.2. Equal treatment

Suppliers must comply with applicable equality laws. We expect suppliers to have a zero tolerance policy towards violence, bullying, intimidation, abuse, discrimination and harassment at work, whether this is verbal, non-verbal or physical in nature.

5.3. Slavery, human trafficking and forced labour

Suppliers must ensure that they comply with all applicable anti-slavery and human trafficking laws and regulations.

5.4. Child labour

Suppliers must comply with all applicable child labour laws and regulations.

5.5. Working hours and payment

We are an accredited [Living Wage Employer](#). That means we pay all directly employed Staff the Living Wage. We also expect regularly contracted Staff, such as contracted catering, cleaning, security, parks or ground Staff, to be paid the Living Wage. If you are a supplier that provides us with contracted Staff, we will address this with you directly. In all other cases, suppliers must pay their workers the minimum wage in the country of employment.

Suppliers must pay workers overtime where legally required. Suppliers must not require their workers to work excessive hours and must allow for regular rest periods and days, in compliance with local laws and regulations.

5.6. Terms of employment

Suppliers must provide their workers with written employment contracts where required by applicable law. We expect suppliers to enable their workers to raise employment related matters with them, and to have systems in place for reported matters to be investigated and resolved fairly.

5.7. Freedom of association

Suppliers must ensure that workers are allowed to associate freely and bargain collectively in compliance with local laws and regulations.

5.8. Health and safety

Suppliers must provide safe working conditions for workers in compliance with applicable health and safety laws.

6. **Environment**

We expect suppliers to adopt responsible environmental practices in compliance with applicable law and internationally recognised standards.

7. **Data protection, privacy and security**

7.1. Data protection and privacy

Suppliers must comply with all applicable data protection and privacy laws and regulations.

7.2. Security

Suppliers must have appropriate technical and organisational measures in place to use information, whether personal data and other information, in a way that ensures its appropriate security, including its confidentiality, availability and integrity. That includes protecting the information against unauthorised or unlawful access or other use and against accidental loss, destruction or damage.

7.3. Artificial Intelligence (AI)

We require suppliers that make use of AI in their products or services to tell us and answer any questions we may have. We expect suppliers to use AI responsibly and to keep us, our Staff and our data, safe and secure.

Suppliers must ensure that their use of AI does not infringe third party rights. Suppliers may not use our data to train AI without our prior written agreement.

8. **Sustainability principles**

8.1. Suppliers must take reasonable steps to:

8.1.1. minimise the environmental impact of delivering the products or services to us; they must not provide us with products or services which consist wholly or partly of single use plastics

- 8.1.2. ensure that the products they supply to us are designed, sourced and delivered in a manner which is environmentally and socially responsible, and
 - 8.1.3. if requested by us and where feasible, demonstrate that the whole lifecycle impacts (including end of use) associated with the products or services they supply to us have been considered and reduced.
- 8.2. On request and at no additional cost to us, suppliers must:
- 8.2.1. provide us with carbon emissions data for the products or services supplied to us in our previous financial year, or
 - 8.2.2. if that information is not available, cooperate with us to estimate those carbon emissions.

9. **Demonstrating compliance**

We expect suppliers to respond transparently and promptly to any reasonable request by us to demonstrate compliance with any part of this Code.

10. **Updates**

We may update this Code from time to time. It is the responsibility of the supplier to ensure that it has read, understands and complies with the most up to date version of this Code.

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Document Control

The Chair of the Responsible Business Board is the owner of this document and is responsible for ensuring that it is reviewed in line with the review requirements of the Quality Standards.

A current version of this document is available to all members of Staff on the EOM.

Version History

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Approvals

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