

SUPPLIER CODE OF BUSINESS CONDUCT

APRIL 2025

Slaughter and May (the “Firm”) is a leading international law firm, providing an extensive range of legal services to a diverse range of clients. We seek excellence in every aspect of our business and are committed to the highest standards of professionalism, ethics and integrity. Furthermore, we are committed to complying with all applicable laws, the professional rules which apply to us as a firm of solicitors and observing the highest standards of propriety.

This Supplier Code of Business Conduct is underpinned by, and should be read in conjunction with, our [values](#) - the highest standards, independence of thought, collective endeavour and respect for all.

It follows that the quality of our suppliers’ goods and services must match the quality of the services we provide to our clients - which is why we expect the very highest standards from our suppliers.

Our suppliers are, therefore, expected to comply with the minimum requirements set out in this Code.

A. COMPLIANCE

1. Obligation to ensure compliance

It is your responsibility to ensure that:

- relevant personnel are informed about this Code;
- all your directors and workers comply with the standards described in this Code; and
- your sub-contractors adhere to standards which are equivalent to those described in this Code.

To facilitate this, we also expect you to support whistle-blowing within your organisation and to have internal policies and procedures in place which encourage your personnel to speak up whenever they have a genuine concern about a legal or ethical issue. We expect you to carry out appropriate due diligence on your own suppliers. You will provide us with details of the due diligence you actually undertake on request.

2. Complying with the law

You must comply with all applicable legal and regulatory requirements when supplying or providing goods and/or services to the Firm. This includes (without limitation) ensuring that your personnel have the legal right to work in all relevant jurisdictions and that you correctly account for and pay any tax liabilities, protect personal data and comply with anti-money laundering, anti-terrorism, sanctions and proliferation financing laws.

3. Facilitation of criminal conduct

When providing services to the Firm, or to others for or on our behalf, you must not aid, assist or enable another person to commit a crime. This prohibition includes (without limitation) the facilitation of fraud and crimes relating to the payment of taxes.

4. Monitoring and reporting

You recognise that an important part of our relationship with you is our ability to assess your continuing compliance with this Code. You will, therefore, fully and promptly answer any queries we have about the matters covered by it and support any audit we wish to carry out focusing on any specific risk areas. This might include, for example, allowing us or our advisors to visit your premises on reasonable notice, access your records and speak direct to your workers in the course of any such visit.

If you become aware of any actual or suspected breach of this Code, including (without limitation) actual or potential instances of modern slavery or human trafficking within your organisation or your supply chain, you must promptly report this to your usual contact at the Firm.

B. BUSINESS ETHICS

5. Avoiding conflicts of interest

You must ensure that you supply or provide goods and/or services to the Firm in a way which is not only lawful, but also open and transparent.

You must therefore anticipate and identify all relevant potential conflicts of interest, report immediately any possible conflicts in writing to your usual contact at the Firm and work with the Firm with a view to resolving them promptly and in a way which is acceptable to the Firm.

For example, if anyone working for you is closely related to a sub-contractor who you intend to recommend to, or evaluate or manage for, the Firm, this should be disclosed to the Firm before any such recommendation is made or evaluation or management takes place

6. Improper payments, hospitality and gifts

We expect our suppliers to act, in all their dealings with us or on our behalf, with honesty and integrity. In particular, you must not:

- accept bribes or any improper payments from any contractors, sub-contractors or other suppliers you recommend to us or manage or evaluate on our behalf;
- offer bribes or any improper payments with a view to securing business for us or with us;
- (with the exception of low-value branded items) give gifts of any significance to anyone who works for us; and
- (with the exception of occasional drinks and ordinary business lunches) entertain anyone who works for us unless you are confident that they have first cleared the matter with their manager/supervisor.

7. Non-collusion

You must never propose or enter into any agreement with another supplier or potential supplier of the Firm or others in your sector to fix prices, terms and conditions of sale, costs, profit margins or anything similar. We expect you to disclose to us in writing in advance of receipt of any commissions, fees or other forms of income you receive as a result of dealing with us.

C. ENVIRONMENT

We expect our suppliers to:

- comply with all applicable environmental laws and regulations, including those relating to waste disposal, pollution and air emissions;
- develop the capacity to actively measure and monitor carbon emissions;
- ensure appropriate policies and procedures are in place to continually improve environmental performance;

- provide accurate management information on environmental performance annually in contract review meetings; and
- be open to work collaboratively with the Firm on collective impact reduction and the setting of targets/goals to reduce the emissions associated with the goods and/or services provided to the Firm.

D. LABOUR AND HUMAN RIGHTS

8. Equality, diversity and inclusion

We expect our suppliers to be committed to the principles of equality and respect for diversity and inclusion. This means that, in your dealings with people in the course of your supply of goods and/or services to us, we expect you to treat individuals with dignity and respect. You should not engage in unwanted, unacceptable and inappropriate behaviour, which includes bullying, harassment, sexual harassment or victimisation, or discrimination on the grounds of race or racial group; sex; sexual orientation; gender identity, gender expression or gender re-assignment; religion or belief; age; disability; socio-economic background or political affiliation.

We expect you to take practical steps to demonstrate your commitment to eliminating discrimination and to promote diversity and inclusion in your workplace.

9. Fair employment practices

You must comply with all applicable employment laws and adopt fair employment practices which are consistent with the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. Specifically, we expect you to have policies, controls and procedures in place to comply with legislation relating to freedom of association, collective bargaining, working conditions, time and remuneration and equality of treatment .

10. Modern slavery

We expect you to have policies, controls and procedures in place which prohibit “modern slavery” and human trafficking (as defined in sections 1, 2 and 3 of the Modern Slavery Act 2015).

You must respect human rights and ensure that modern slavery and human trafficking are not taking place within your business or supply chain. You must not engage in any practices that are known to contribute to the risk of modern slavery and human trafficking. These include, for example, charging workers recruitment fees (so they are effectively paying for the opportunity of employment), retaining workers’ identity documents (such as their passports) or requiring workers to lodge deposits or bonds (which are effectively “runaway insurance”). We also expect you to avoid treating or making demands of your suppliers that might in any way lead them to violate human rights. Examples of this might include you making late payments or placing late orders as a matter of routine.

If you are required to publish an annual modern slavery statement, you must provide us with a copy of this statement on request. We expect you to provide regular training to your personnel to raise awareness of modern slavery and human trafficking and enable them to identify risk indicators.

11. Health, safety and wellbeing

As a supplier we expect you to maintain the highest standards of health and safety at all times. To facilitate this you must:

- comply with all applicable health and safety laws, regulations and follow best practice in accordance with applicable industry standards;
- identify the risks arising from your business activities and implement control measures to minimise these risks so far as reasonably practicable;
- manage your business activities to ensure the health, safety and welfare of anyone who may be affected by your acts or omissions;
- regularly monitor the performance of your own suppliers and contractors to ensure they maintain the highest standards of health and safety;

- seek continuous improvement through planning, monitoring and reviewing the performance of your health and safety management system.

In addition, we expect you to take appropriate steps to support the physical and mental health and wellbeing of your workers and anyone that may be affected in the course of your supply of goods and/or services.

Statement of understanding and commitment

We hereby confirm that we share the aims and commitments described in this Code and that we will comply with the obligations and responsibilities in it. We understand that this is fundamental to us being appointed as a supplier of, and continuing to supply goods and/or services to, Slaughter and May.

Signed: _____

Printed name and role: _____

Name of supplier: _____

Date: _____

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