

BUSINESS WITH INTEGRITY: OUR COMMITMENT

Addleshaw Goddard believes in sourcing goods and services from suppliers who operate their businesses in a lawful and socially and environmentally responsible way.

We expect each of our suppliers to conform, as a minimum, to the following standards of operation and to impose equivalent obligations on their suppliers.

People:

- ▶ The supplier shall protect and maintain the human rights of all its workers.
- ▶ The supplier shall take all appropriate steps to eradicate modern slavery in all of its forms.
- ▶ The supplier shall not discriminate on any grounds against its workers, within the customs and practices of the countries in which a worker is engaged.
- ▶ The supplier shall comply with applicable laws and regulations relating to:
 - ▶ minimum wage and benefits and shall apply prevailing industry wages and benefits where higher;
 - ▶ working time and shall ensure that any overtime shall be voluntary;
 - ▶ minimum working age and shall ensure that child labour is not used; and
 - ▶ health and safety at work.
- ▶ The supplier shall engage workers on fair and easily understandable terms and conditions and provide clear, fair and uniformly applied grievance and disciplinary procedures.

Environment:

- ▶ All applicable environmental laws and regulations shall be complied with in the geographical areas in which the supplier operates.
- ▶ The supplier shall seek to source resources and carry on its own business in a way to minimise the carbon footprint and all other harmful environmental effects.
- ▶ All hazardous or toxic waste that is produced by the supplier must be properly identified and disposed of by licensed and competent bodies via authorised and/or licensed means.

Legitimate Financing:

- ▶ The supplier shall carry on its business without the making or taking of bribes in any form and by taking positive action to prevent any such corrupt practices within its supply chain.
- ▶ The supplier shall be vigilant when dealing with its own suppliers and customers, that any monies received are from legitimate sources and that any monies paid out are for a legitimate purpose.
- ▶ The supplier shall structure and carry on its business in a way that ensures the right amount of tax is paid at the right time and in the right place and shall put reasonable measures in place to prevent the criminal facilitation of tax evasion.
- ▶ The supplier shall co-operate fully with any Addleshaw Goddard procedures relating to anti-bribery and corruption, anti-money-laundering and counter-terrorist financing and the prevention of tax fraud.

Management and Transparency:

- ▶ The supplier shall develop and implement written policies, appropriate to the size and nature of the supplier's business, which address:
 - ▶ protecting human rights and preventing discrimination and modern slavery;
 - ▶ providing a safe and healthy workplace and promoting fair working practices;
 - ▶ preventing illegitimate, fraudulent or criminal financing streams; and
 - ▶ promoting sustainability and preventing, mitigating and controlling environmental damage.
- ▶ The supplier shall appoint, at senior management level, individuals to take responsibility for health and safety, workers rights, anti-bribery and corruption, anti-money-laundering and counter-terrorist financing and the prevention of tax fraud, local community wellbeing and managing environmental performance.
- ▶ The supplier shall provide ongoing training to workers on all people policies, anti-bribery and corruption, anti-money-laundering and counter-terrorist financing and the prevention of tax fraud policies and environmental policies and the procedures to be followed in order to implement such policies successfully.
- ▶ The supplier shall implement due diligence processes in order to ensure that policies are being adhered to and that ethical, lawful and environmentally responsible practices are being implemented throughout the supply chain.
- ▶ The supplier shall collate the data on all its business practices (regarding health and safety, workers rights, anti-bribery and corruption, anti-money laundering, counter-terrorist financing and prevention of tax fraud measures, local community wellbeing) and its environmental performance and shall seek to achieve better transparency by reporting publically on such matters.

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