

## Linklaters' Supplier Code of Conduct

September 2022



This Supplier Code of Conduct (“**Code**”) applies to all suppliers and their subsidiaries and subcontractors that provide goods or services to Linklaters. Suppliers contracting with Linklaters are expected to promote the principles of this Code in their own supply chains.

Linklaters is committed to being a responsible and sustainable business. We are a proud signatory of the UN Global Compact and, in 2021, we extended our commitment to carbon reduction by adopting targets approved by the Science Based Targets Initiative (SBTi).

Our Environment, Social and Governance (ESG) practice advises many of our clients on their sustainability journey and we know how much our own response matters to our people, to our clients and to other key stakeholders around us.

Our supply chain accounts for a significant part of our impact on the environment and society. We are bold in our ambition and want to develop pioneering, accountable and transparent partnerships with our suppliers, seeking reliable and fair relations for the mutual benefit of Linklaters and our supply chain.



### Legal Compliance

While Linklaters recognises that there are different legal and cultural environments in which suppliers operate, this Code outlines the basic responsible requirements to which suppliers should adhere in order to do business with Linklaters. To the extent suppliers are unable to comply with the Code due to laws and regulations, suppliers shall, to the extent reasonably possible, adhere to the spirit of the Code. If local customs or practices are in contradiction with the Code, suppliers shall comply with the Code.

Suppliers are expected to comply with this Code as a prerequisite to every Linklaters contract, confirming that their operations comply with the provisions listed in this Code. Suppliers must be able to demonstrate adherence to the Code at the request of Linklaters, who reserve the right to audit suppliers based on the principles of this Code. This Code should be read in conjunction with [Linklaters' Responsible Sourcing Policy](#) and [Linklaters' Ethical Code](#).



### Working with Suppliers to meet the Standards of the Code

Suppliers are expected to be transparent in their practices and actively promote adherence to Linklaters' policies and processes. Linklaters regularly monitors suppliers through a supplier governance framework, including the use of suitable accreditations, certifications, self-assessments and audits, to identify and assess potential risks. In the case of non-compliance, Linklaters will work collaboratively with suppliers to implement remedial actions.

Linklaters reserves the right to refuse partnerships with suppliers that do not achieve or are unable to demonstrate progress towards this Code and that adopt approaches which are inconsistent with Linklaters' own principles.

If suppliers become aware of a breach of any of the requirements of the Code by their own employees or Linklaters employees, suppliers should inform Linklaters as soon as possible. Reports can be sent to [regulatorycompliance@linklaters.com](mailto:regulatorycompliance@linklaters.com) or our externally-hosted hotline SpeakUp.



## Supplier Code of Conduct

In addition to complying with all applicable domestic and international laws, Linklaters expects its suppliers will:

### Labour and Human Rights

Respect internationally-recognised human rights, including those set out in the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the principles set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

#### Child Labour

- > Support the elimination of child labour by ensuring child labour is not utilised in their operations and employ only employees who meet or exceed the applicable minimum legal working age in the country in question.

#### Community Rights

- > Respect community rights, such as access to land, land usage rights and the right to a safe environment, in all their operations. Suppliers should assess, anticipate and avoid negative impacts on local communities within which they operate.

#### Discrimination

- > Demonstrate a commitment to equality of opportunity for individuals and groups enabling them to live their lives free from discrimination, harassment or oppression.
- > Treat employees in a fair and equal manner. No staff member or job applicant should be treated less favourably, or experience discrimination (direct or indirect), harassment or victimisation on the basis of their age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex and/or sexual orientation or any other characteristic protected by law in any of the jurisdictions in which Linklaters operates. The promotion of equal opportunities extends to all aspects of an individual's work including: recruitment, selection, training, promotion, staffing and terms and conditions of employment.

### Freedom of Association and Collective Bargaining

- > Respect the right of all employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities. Employees and/or their representatives shall be able to communicate openly and to share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

### Health and Safety

- > Take appropriate measures to ensure the health, safety and wellbeing of their workforce including third parties and anyone that may be affected by their work activities including Linklaters employees, visitors and the wider public. Suppliers must comply with all applicable health and safety laws, regulations and best practice guidelines. Suppliers must have suitable arrangements in place to manage health and safety risks. Suppliers must disclose any information that comes to their knowledge that demonstrates that any of their products or services breach internationally-accepted safety standards or guidelines.

### Modern Slavery

- > Afford employees the freedom to choose employment. Employees should be free to leave the employment after reasonable notice is served. Suppliers should not use any form of slavery, servitude or forced or compulsory labour and employees must not be obliged to lodge identity papers or pay any deposit as a condition of work.

### Wage, Working Hours and Other Conditions of Work

- > Offer wages, including overtime premiums, and benefits that at least meet international conventions and, in the United Kingdom, ensure a commitment to the Real Living Wage.
- > Prescribe working hours which are compliant with international conventions.
- > Establish recognised employment relationships with their employees that are in accordance with international conventions. Suppliers should not seek to prevent employees from exercising their legal or contractual rights.



Abu Dhabi | Amsterdam | Antwerp | Bangkok | Beijing | Berlin | Brisbane\* | Brussels | Cape Town\*\*\* | Dubai | Dublin  
Düsseldorf | Frankfurt | Hamburg | Hanoi\* | Ho Chi Minh City\* | Hong Kong SAR | Jakarta\*\* | Jeddah<sup>Δ</sup> | Johannesburg\*\*\*  
Lisbon | London | Luxembourg | Madrid | Melbourne\* | Milan | Munich | New York | Paris | Perth\* | Port Moresby\*  
Riyadh<sup>Δ</sup> | Rome | São Paulo | Seoul | Shanghai<sup>ΔΔ</sup> | Singapore | Stockholm | Sydney\* | Tokyo | Warsaw | Washington, D.C.

\* Office of integrated alliance partner Allens

\*\* Office of formally associated firm Widyawan & Partners

\*\*\* Office of collaborative alliance partner Webber Wentzel

<sup>Δ</sup> Office of Zamakhchary & Co. Linklaters in agreement with Zamakhchary & Co.

<sup>ΔΔ</sup> Linklaters Shanghai and Linklaters Zhao Sheng (joint operation office with Zhao Sheng Law Firm)



## Business Ethics

Apply stringent ethical and moral business standards in line with those set out in the Bribery Act (United Kingdom), the Foreign Corrupt Practices Act (United States of America) and equivalent laws in other jurisdictions.

### Conflict of Interest

- > Avoid contracts that might lead to, or suggest, a conflict of interest between personal activities and the supplier.

### Data Protection

- > Protect the reasonable privacy expectations of the personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with all data protection laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.
- > Protect confidential information from improper disclosure, ensuring that any authorised communication of confidential information is limited to individuals who need it to carry out their work.

### Anti-Bribery and Corruption

- > Uphold the highest standards of integrity in all business interactions. Suppliers shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion, embezzlement or other similar unethical practices, including improper offers of payments or gifts to or from employees. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

### Fair Competition

- > Compete in a fair manner in compliance with all applicable competition laws and regulations. Suppliers shall not enter into any agreements with their competitors to increase prices or to restrict the availability of products.

### Gifts and Hospitality

- > Neither give nor accept hospitality or gifts that might appear to incur an obligation. The supplier should maintain proper records of all hospitality or gifts whether offered, received or declined.



## Environment

As an absolute minimum, comply with all applicable environmental laws, regulations and standards, whilst striving to adopt the best environmental practices for their sector. Suppliers shall implement initiatives which will reduce the adverse environmental impacts associated with their products and services by taking a lifecycle approach and by adopting the measures below.

### Carbon Reduction and Environmental Management System

- > Have an appropriate, structured and systematic approach to managing environmental responsibilities and impacts, preferably through a certified environmental management system.
- > Continuously strive to reduce energy consumption and to improve energy efficiency and the carbon footprint of its operations, products and services.
- > Establish an organisation-wide greenhouse gas reduction target and track, document and report on progress against the target.

### Hazardous Materials

- > Ensure chemicals, waste and other materials posing a hazard to humans or the environment are minimised, identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

### Waste Minimisation and the Circular Economy

- > Promote the circular economy, including through the use of natural materials, recycled content and end-of-life takeback and reuse schemes.
- > Continuously strive to integrate circular economy principles into design and operational processes to support resource efficiency and waste prevention.
- > Prevent and reduce waste arising from services and product manufacture, installation and packaging and at the end of product life.
- > Implement the waste hierarchy with a focus on prevention, reduction, reuse and recycling of materials.