

Lewis Silkin LLP - Supplier Code of Conduct

Introduction

Lewis Silkin is committed to doing business with integrity and in accordance with the highest ethical standards. We have a zero-tolerance approach to:

- Forced labour;
- Human rights violations;
- Bribery and corruption;

and we expect our suppliers to adhere to these same values and standards and share the responsibility of ethical business.

This Code applies to all persons providing goods or services to us (whether for our benefit or that of our clients) as well as to each of their directors, staff, sub-contractors, and delivery chain partners. We expect our suppliers to follow the principles set out herein as a minimum and to develop relationships with their own supply chains consistent with the principles set out below.

1. Compliance with Applicable Laws and Regulations

All business should be conducted in compliance with applicable laws and regulations.

2. Labour Practices and Standards

Employment is freely chosen.

There is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.

We do not use any form of forced labour and we are committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own business and its supply chain.

We expect all those who work on our behalf, including agency workers, casual and freelance staff, suppliers and representatives (as well as our employees) to comply with our Anti-Slavery and Human Trafficking policy available on our website.

Freedom of association and the right to collective bargaining are respected.

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. We expect our suppliers to adopt an open attitude towards the activities of trade unions and their organisational activities. Workers' representatives should not be discriminated against and should have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Working conditions are safe and hygienic.

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work.

Child labour shall not be used.

There shall be no recruitment of child labour. We expect our suppliers and representatives to uphold the rights set forth in the Convention on the Rights of the Child and ILO Minimum Age Convention. Where there is no legislative age prescribed in the relevant jurisdiction, a "child" should be considered

as anyone under the age of 15. Workers aged 18 and under shall not be employed to work at night or in hazardous conditions.

Living wages are paid.

Wages and benefits paid for a standard working week should meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. All workers shall be provided with written and understandable information about their employment conditions and wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Lewis Silkin is an accredited Living Wage Employer, as per the Living Wage Foundation. Suppliers are expected to pay all regularly contracted staff working for Lewis Silkin the Living Wage. All staff working in London will be paid at the minimum the London Living Wage. Regularly contracted staff include those working two or more hours a week, for eight or more consecutive weeks a year.

Working hours are not excessive.

Working hours comply with national laws and benchmark industry standards, whichever affords greater protection. In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

No discrimination is practised.

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, faith, age, disability, gender, marital status, sexual orientation, socio-economic background, union membership or political affiliation. Recruitment practices should eliminate barriers to social mobility and attract the best candidates from a diverse pool of talent.

Regular employment is provided.

To every extent possible, work performed must be based on a recognised employment relationship established through national law and practice. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through using labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

No harsh or inhumane treatment is allowed.

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

3. Environmental management.

Environmental impact should be monitored and reduced as far as possible. We seek to reduce the environmental impact of all our activities including in our supply chain. We support for the aims of the Science-Based Targets Initiative (www.sciencebasedtargets.org) to reach net-zero greenhouse emissions. We expect our suppliers and representatives to also strive towards improving the efficiency and sustainability of their operations including by reducing greenhouse gas emissions, reducing waste, water and energy conservation programmes and reserve the right to request data from our suppliers regarding the products and services supplied to us.

4. Ethical Business Practice

Business should be conducted with integrity and the highest ethical standards. Money laundering, bribery and corruption, acting in conflict of interest, tax evasion and human rights abuses will not be tolerated.

Confidentiality and Information Security.

The confidentiality of information exchanged during business must be respected and never be used for illegal purposes or for individual gain. False information must not be given during commercial negotiations. Robust cyber security processes and controls shall be put in place to protect data and confidential information and all applicable privacy / data protection and information security laws and regulations must be complied with.

No bribery or corruption will be tolerated.

The offering, paying, soliciting or accepting of bribes or kickbacks, including facilitation payments, is strictly prohibited. A bribe may involve giving or offering any form of gift, consideration, reward or advantage to someone in business or government in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribery can also take place where the offer or giving of a bribe is made by or through a third party, e.g. an agent, representative or intermediary. Some examples of bribes include (this is not an exhaustive list):

- lavish gifts, meals, entertainment or travel expenses, particularly where they are disproportionate, frequent or provided in the context of ongoing business negotiations;
- the uncompensated use of company services, facilities or property;
- cash payments; loans, loan guarantees or other credit;
- the provision of a benefit, such as an educational scholarship or healthcare, to a member of the family of a potential customer, public or government official;
- providing a subcontract to a person connected to someone involved in awarding the main contract; and engaging a local company owned by a member of the family of a potential customer, public or government official.

Facilitation payments are small payments or fees requested by government officials to speed up or facilitate the performance of routine government action (such as the provision of a visa or customs clearance). Such payments are strictly prohibited.

Suppliers, representatives and their employees must comply with all applicable anti-bribery and corruption laws. If no such anti-bribery or corruption laws apply or are of a lesser standard to that prescribed in the UK Bribery Act 2010, suppliers, representatives and their employees must adhere to the UK Bribery Act 2010.

Suppliers and representatives shall have in place anti-corruption and bribery procedures designed to prevent employees or persons associated with its business from committing offences of bribery or corruption. Suppliers and representatives will properly implement these procedures into their business and review them regularly to ensure that they are operating effectively.

Quality.

Any goods supplied shall be without fault and of the best available design, quality, material and workmanship available for the price paid. Goods must be fit for the purposes held out by the supplier or for which they are commonly used and shall conform in all respects with any order and specification and/or patterns or samples supplied or advised by the supplier.



Any services supplied shall be provided by appropriately qualified and trained personnel, with due care and diligence, to such high standard of quality as is reasonable for us to expect in all circumstances and shall conform in all respects with any order.

Audit and termination of agreements.

We reserve the right to verify a supplier's compliance with this Code and may require a supplier to complete a self-assessment questionnaire in relation to its business practices and supply chain. This may be for our own internal purposes, or to satisfy the requirements of one of our clients.

Where a supplier review or audit demonstrates shortcomings in any of these areas, the supplier should strive to implement a time-bound programme of improvement (remediation) leading to conformance. If we become aware of any actions or conditions not in compliance with this Code, we may request corrective actions. We reserve the right to terminate an agreement with any supplier that does not comply with this Code.

Our suppliers acknowledge that, in certain circumstances, we may report any activity in breach of the Supplier Code of Conduct to the appropriate authorities.

Last updated: February 2023