



DWF Supplier Code of Conduct

July 2023



Contents

INTRODUCTION	3
OUR VALUES	4
RESPONSIBLE BUSINESS PRACTICE	5
HUMAN RIGHTS	5
RESPONSIBLE SUPPLY CHAIN MANAGEMENT	6
CLIMATE ACTION & ENVIRONMENTAL MANAGEMENT	7
COMPLIANCE WITH THIS CODE	8



dwfgroup.com



procurement@dwf.law



Introduction

It starts with our Purpose

At DWF, we are driven by a common purpose to deliver positive outcomes with our colleagues, clients and communities. As a global legal business we must act responsibly, how we do business is just as important as what we do

Leading with purpose means living up to our values, ensuring we are able to demonstrate the extent to which those values inform business decisions in a way that is consistent with the expectations of our stakeholders. This includes the manner in which we source goods and services from our suppliers.

This Code sets out what we expect in terms of responsible business behaviour and demonstrates an attitude that is alert and responsive to the challenges of doing business in a global context.

Since 2016, we have been a signatory to the Ten Principles of the UN Global Compact on human rights, labour, environment and anti-corruption. They provide a blueprint for how a responsible, sustainable business operates and contribute to the delivery of the UN Sustainable Development Goals - a set of global goals to end poverty, inequality and protect the planet.

Our ESG strategy includes ambitious science-based targets, with an explicit commitment to substantially reducing carbon emissions across our value chain – the ESG credentials of a supplier are a specific factor included in business award decisions made by DWF. Consistent with our commitment to responsible business, we support the Universal Declaration of Human Rights and respect the following international and national codes and standards:

- ILO (international Labour Organisation) labour standards
- UK Prompt Payment Code
- UK Living Wage

Guiding Principles

- We believe in developing mutually beneficial relationships with our suppliers, founded on trust and respect
- We conduct business with integrity, complying with all applicable laws, rules and regulations of the countries in which we operate
- We maintain our zero tolerance approach to bribery or any form of unethical inducement or payment to gain any advantage for DWF
- We promote a diverse and inclusive workplace and will not tolerate discrimination, bullying, harassment or victimisation in our workplace or in connection with any service provision
- We adopt a zero tolerance to slavery, forced labour and human trafficking
- Identify and avoid any actual or apparent conflict of interest.
- Maintain a zero tolerance approach to child labour
- We believe in being good corporate citizens and shared responsibility to contribute to community prosperity and resilience
- We contribute to the global effort to reduce, reuse and recycle wherever possible.

What we need you to do

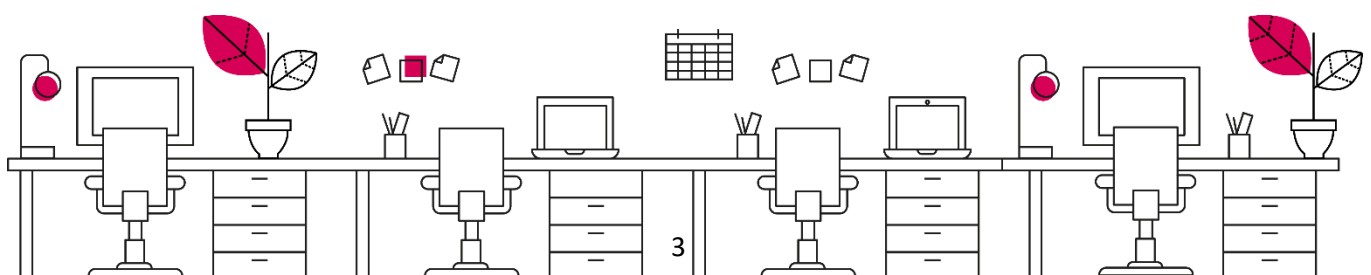
- Support our guiding principles;
- Confirm your agreement to comply with this Code (and any future revisions) as part of the due diligence suite when requested
- Share this Code with your employees so they understand what is important to us;

Living our Values

This Code describes how we put our values into practice. It helps us to do the right thing, to ask the right questions and make the right decisions every day. However, no Code can describe every situation we might face, cover every applicable law or action we take.

Our culture depends on all of us living our shared values every day, so our colleagues, clients, suppliers and communities can remain confident that their trust in us is not misplaced.

Our values define who we are and what we stand for. They are what we believe and influence the behaviours people see and experience. That's why it is so important that we apply these values to everything that we do.



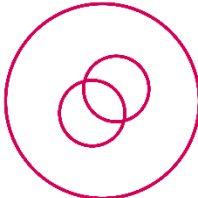
Our Values

Created, shared and upheld by our colleagues, our values help us to define and reinforce our culture.



Always Aim Higher

We exceed the expectations of our colleagues and our clients in everything we do.



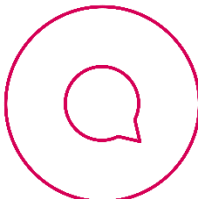
Be Better Together

We listen, recognise and support each other to protect a diverse and inclusive culture and sustain our business, clients and communities.



Disrupt to Progress

We embrace change and new ways of working to enhance our performance and our reputation.



Keep All Promises

We listen, recognise and support each other to protect a diverse and inclusive culture and sustain our business, clients and communities.



Attend to Details

We achieve the best results to complex problems by focusing on simple and effective solutions.

Responsible Business Practice

Our expectations of suppliers are grouped into 6 key areas:



Human Rights



Health & Safety



Responsible Supply Chain Management



Diversity & Inclusion



Business Integrity



Climate Action & Environmental Management

Human Rights



As a responsible business and employer, upholding human rights is fundamental to who we are and what we stand for.

We expect you to:

- Respect the human rights of your employees
- Comply with all relevant legislation, regulations and directives in the countries and communities in which you operate
- Ensure that all employees can make a free choice about their employment: there should be no illegal, forced, bonded, involuntary or exploited labour
- Ensure there is no involvement in incidences of human trafficking or involuntary movement of people for exploitation
- Ensure that no underage workers are employed, either directly or indirectly
- Pay wages which at least meet minimum national standards, overtime is voluntary, used reasonably and compensated fairly
- Respect the rights of your employees to associate freely, join or not join labour unions, seek representation and join workers' councils
- Provide a workplace free of harsh and inhumane treatment, mental or physical coercion or verbal abuse
- Prohibit direct and/or indirect discrimination on the basis of age, gender, ethnicity, race, nationality, paternity and/or maternity, marital/civil partnership status, pregnancy, sexual orientation, gender transition or reassignment, gender identity/expression, disability, national, cultural, religious or personal beliefs, part time or full time status, or flexible and agile working.

Health & Safety

We take our health and safety responsibilities seriously and have a Safety Management System in place. We expect you to also operate in a manner which is safe.

We expect you to:

- Provide & promote a safe working environment abiding by local laws and regulations, respecting the health & wellbeing of your employees and any subcontractors
- Have a Health & Safety Policy in Place unless local legislation dictates otherwise
- Identify and assess emergency situations in the workplace and minimize their impact through prevention and by implementing emergency plans and response procedures
- Provide training of colleagues on Health & Safety and have sufficient representation of H&S officers e.g. first aiders, fire marshals

Responsible Supply Chain Management

It is important to us to engage with our supply chain, to understand more about your priorities and to collaborate and support you.

We expect you to:

- Deal fairly with subcontractors in your supply chain, avoiding the flow of unreasonable levels of risk to subcontractors who cannot be expected to manage or carry these risks
- Manage your suppliers appropriately to mitigate supply chain risks. This may include the development and implementation of appropriate business continuity plans for operations
- Supporting the supply of goods and services to DWF
- Not create barriers to the use of small businesses and social enterprises qualified to provide goods or services
- Have reasonable payment policies in place aligned to our own commitment to the Prompt Payment Code
- Encourage innovation in your supply chain to increase the value or quality of supply and to take positive actions to improve social, ethical and environmental standards where relevant

Diversity & Inclusion

Our vision is to create a working environment and culture where colleagues of all different backgrounds are able to contribute at their highest level to deliver positive outcomes for our colleagues, clients and communities.

This means sustaining a workplace where everyone is included, valued and equipped with skills for today and the future.

We expect you to:

- Provide a workplace free of bullying, harassment and discrimination
- Make available to workers a mechanism to express grievances without fear of reprisal, ensuring concerns are dealt with appropriately and in a timely manner
- Support the development of an inclusive and diverse workforce through all aspects of your operations and management
- Offer equality of opportunity in employment, skill development and career progression, particularly with under-represented segments of society in the area of local operations

Business Integrity



Maintaining the confidence and trust of our stakeholders is essential to our continued success and we work hard to hold ourselves to the highest standards of integrity and governance.

We expect you to:

- Conduct business with integrity and a high regard for social responsibility
- Abide with the requirements of local, national and international laws and regulations regarding ethical and social conditions (as covered in this Code)
- Suppliers shall support the elimination of child labour.
- Prohibit bribery or other means of obtaining an unfair advantage and adhere to anti-corruption laws
- Have procedures in place to cover improper payments, conflicts of interest, extortion and fraud, gifts and hospitality
- Any DWF employee should avoid any actual or apparent conflict of interest. Suppliers are required to communicate potential conflicts of interest immediately to DWF. Suppliers may also be asked as part of any initial dialogue to declare any such known or potential connections to DWF which may be deemed a conflict of interest (failure to declare or withholding relevant information about a known or potential conflict of interest may result in a contract with a supplier being terminated at DWF's sole discretion).
- Have in place reasonable prevention procedures to prevent persons associated with you from engaging in criminal facilitation of tax evasion
- Safeguard at all times and in full the integrity and security of your systems and inform us immediately if you become aware of any cyber security incident that affects or has the potential to affect DWF information and/or personal data (Please notify using both informationsecurity@dwf.law and procurement@dwf.law)
- To comply in full with all applicable legislation within all operational jurisdictions.

Climate Action & Environmental Management



We have set an aggressive science-based target to reduce our Scope 1, Scope 2 and Scope 3 carbon emissions by 50% in line with a 1.5C pathway and have an Environmental Management System accredited in the UK to the ISO14001 Standard to identify and control the impacts of our business.

We expect you to:

- Comply with all applicable environmental regulations
- Conserve natural resources and engage in activities aimed at reducing water usage and energy consumption
- Work to reduce your direct and indirect carbon emissions in line with the global transition to a low carbon economy
- Constructively engage with DWF to explore collaborative opportunities to reduce carbon output and enhance resilience to climate change
- Contribute to the global effort to reduce, reuse and recycle wherever possible
- Operate in a responsible manner to ensure the safe handling, movement, storage, recycling, reuse or management of waste and prevention of spills/releases into the environment
- Assist DWF in understanding your impact on the environment and plans to reduce these impacts. Consider the benefits of being certified to a formal Environmental Management System Standard such as ISO14001
- Apply innovative approaches to managing the supply chain in order to cut carbon emissions
- Explore commitment and adoption of science based targets (Ambitious corporate climate action - Science Based Targets)
- Encourage good mental health and wellbeing at work including encouraging work-life balance.

Compliance with this Code

We expect all our suppliers to meet or exceed the provisions of this Code. Our goal is to build trust and open relationships with our supply chain and work with you to develop our approach to responsible sourcing and sustainable procurement.

If there are situations where you fall short of this Code, you must let us know. We will work with you on the development of an improvement plan. If the issue is serious enough or cannot be resolved in a reasonable period of time, we may review the provision of goods or services by you and ultimately discontinue the relationship.

The expectations in this Code are in addition to and not in lieu of any legal agreement or contract.

By submitting this information, you hereby declare and undertake, on behalf of the supplier, that the information you have provided is true, complete and factually correct and that:

- you are an appropriately authorised representative of the named company/organisation;
- you are duly authorised to complete and submit this form on behalf of the named company/organisation;
- the named company/organisation complies in full with all relevant and applicable laws and will continue to do so on an ongoing basis;
- you will notify DWF immediately should any change occur which affects any self-assessment response answer or statement;
- you acknowledge that DWF reserve the right to seek further clarification and/or detail in respect of any response provided;
- understand that deliberately, recklessly or negligently making a false, inaccurate or misleading statement could result in a range of sanctions being applied, including but not necessarily limited to, immediate termination of any and all contracts or other agreements between DWF and the named company/organisation at DWF's sole and absolute discretion
- DWF have the right to check on this information and on occasion require evidence (e.g. policies etc.) to fulfil our internal audit requirements of our suppliers

Name & Position of the Person Submitting the Form	
---	--



DWF is a leading global provider of integrated legal and business services.

Our Integrated Legal Management approach delivers greater efficiency, price certainty and transparency for our clients. All of this, without compromising on quality or service. We deliver integrated legal and business services on a global scale through our three offerings; Legal Services, Legal Operations and Business Services, across our eight key sectors. We seamlessly combine any number of our services to deliver bespoke solutions for our diverse clients.

Document Classification: External	Version No: v1.0
Policy Name: Supplier Code of Conduct	Policy Owner: Senior Finance Manager
Authorised by: Finance Director	Effective Date: 16/01/2024
Last Review Date: 16/01/2024	Next Review Date: 01/07/2024
Jurisdiction: Group	