

Supplier Code of Conduct

DWF Group plc | 2022

Contents

Foreword	3
Introduction	4
Guiding Principles	4
What we need you to do	4
Living our Values	5
Our Values	5
Supplier Responsible Business Practice	6
Human rights	6
Health & Safety	6
Responsible Supply Chain Management	6
Inclusion & Diversity	7
Business Integrity	8
Climate Action & Environmental Management	8
Compliance with this Code	9



dwfgroup.com



Karl.Waribold@dwf.law



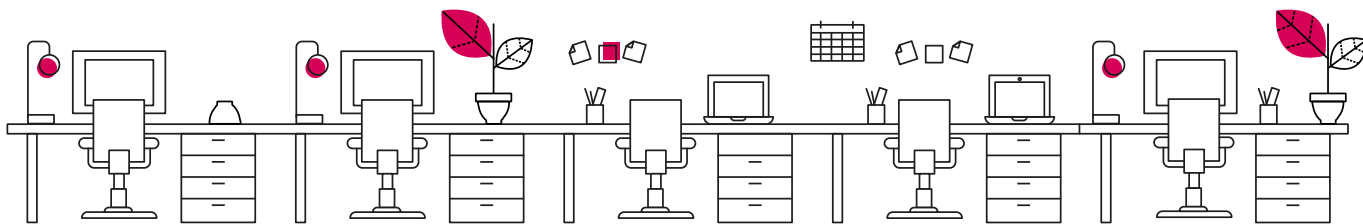
[linkedin.com/company/dwf](https://www.linkedin.com/company/dwf)



[@DWF_Law](https://twitter.com/DWF_Law)



Foreword



I am pleased to share with you our updated Supplier Code of Conduct which I believe continues to provide the basis for trusting and open relationships and is an important aspect of working together across our supply chain to help address the key environmental, social and governance (ESG) issues impacting our world today.

As a leading global provider of integrated legal and business services, we play an important role in helping business to grow and prosper. However, as the only Main Market listed business in our sector, we also recognise that there is increased stakeholder interest in how we do business, where and who we do business with and the level of our ambition and action to integrate and manage ESG (Environment, Social and Governance) risks into our business operations.

Society and business are best served by responsible business behaviours and practices and in line with our purpose and values, this Code reinforces our commitment to a responsible, sustainable and inclusive future and sets out the key ESG values and behaviours that we want you to abide by. Together, we can utilise our collective strength as a force for good.

In recognition of the importance of how we conduct ourselves, we have published our ESG strategy on our website [ESG Statement](#) - the launch of the strategy followed a comprehensive review of business processes and behaviours alongside the completion of an independent Materiality Assessment. It therefore reflects the ESG issues most important to all stakeholders of the DWF Group and

includes ambitious science-based targets to reduce carbon emissions in line with the Paris Agreement, alongside stretch targets to continue to increase the diversity of our workforce. Our global D&I strategy can also be accessed via our website [Diversity and Inclusion](#).

Extreme weather episodes around the world are a frequent occurrence, reinforcing the need to focus on how we can significantly reduce carbon emissions; this is a significant challenge globally, and presents a corresponding opportunity for innovation within the supply chain – challenging each other on how we can do things differently to deliver increasingly environmentally responsible business should become the norm.

Continuing to evolve our response to the issues highlighted requires visible support, insight and collaboration with our suppliers which is not only the right thing to do, it also makes business sense. In developing this code I remained mindful of differences in culture and the challenges associated with interpreting and applying this code globally, but believe that what is expected is universal and I invite you to work with us so we can make a real difference together.

Karl Warmbold
Director of Workplace & Property



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
- 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) upon request;
- Share this Code with your employees so they understand what is important to us;
- Let us know if for any reason you are unable to comply with the Code.

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 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

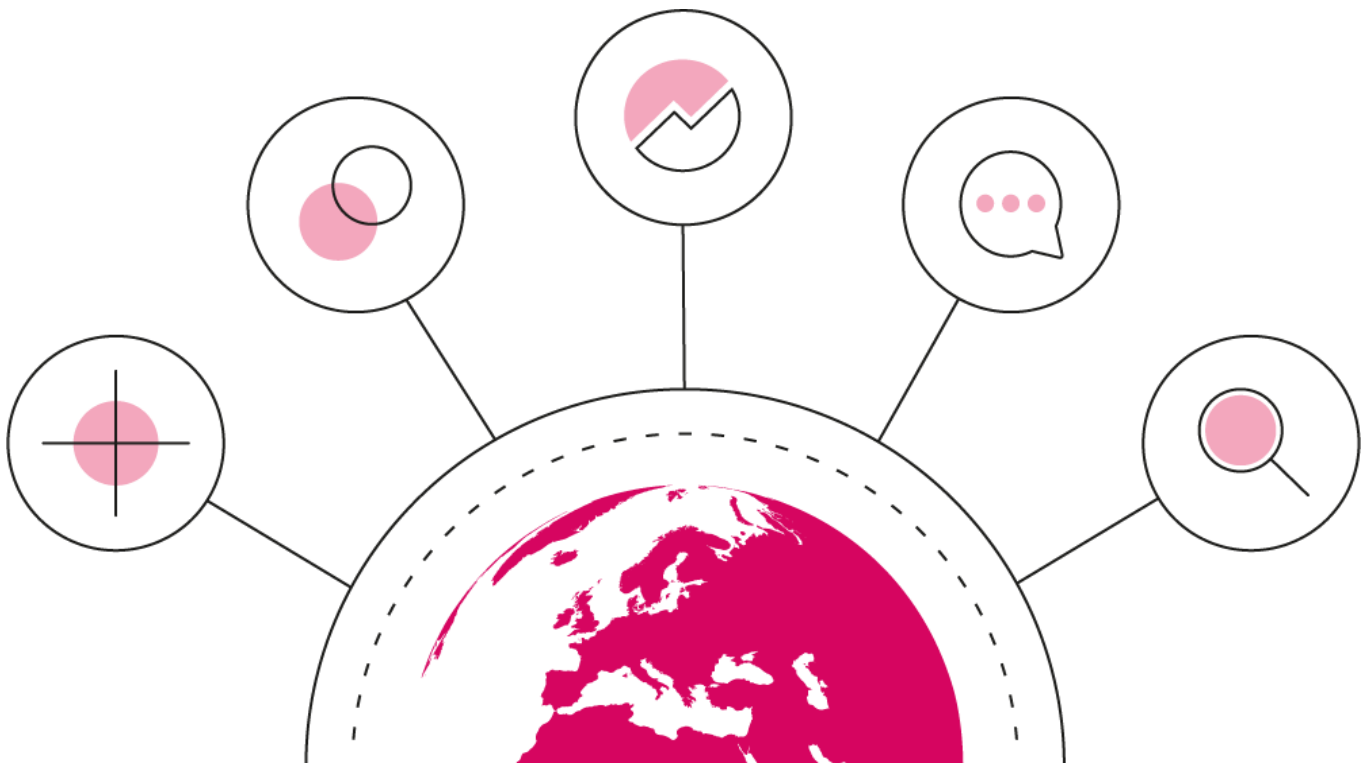
We embrace change and new ways of working to enhance our performance and our reputation.

Keep all promises

By keeping the promises we make to our colleagues and our clients, we build trust, loyalty and credibility.

Attend to details

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



Supplier Responsible Business Practice

Our expectations of suppliers are grouped into 6 key areas:

1. Human Rights
2. Health & Safety
3. Responsible Supply Chain Management
4. Inclusion & Diversity
5. Business Integrity
6. 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
- Apply these principles to any DWF employees, clients or other stakeholders that you may come into contact with

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 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 (where required to do so)
- Identify and assess emergency situations in the workplace and minimize their impact through prevention and by implementing emergency plans and response procedures

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
- Apply innovative approaches to managing the supply chain in order to cut carbon emissions

Inclusion & Diversity

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 (evidenced if required)
- Make available to workers a mechanism to express grievances without fear of reprisal, ensuring concerns are dealt with appropriately and in a timely manner
- Demonstrate mutual respect as part of the way we do business
- 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
- Encourage mental health and wellbeing at work.



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:

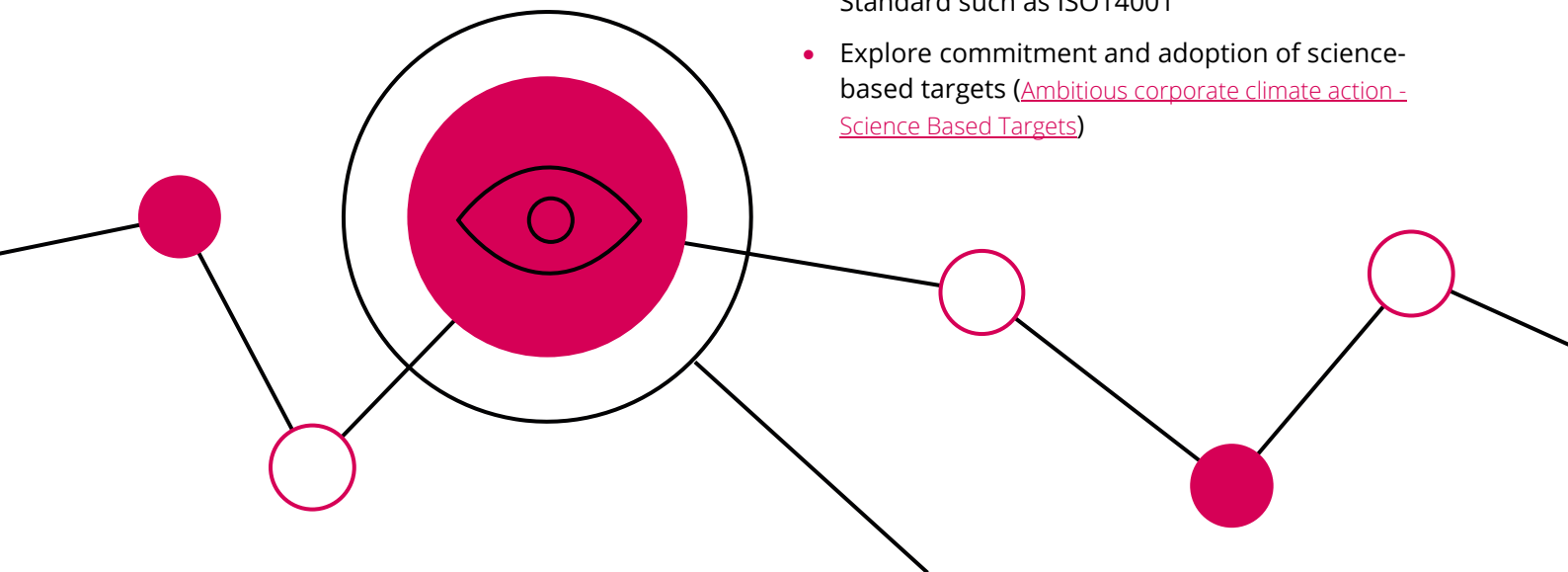
- Conduct business with integrity and a high regard for social responsibility
- Abide with the requirements of local, national and international laws and regulations regarding ethical and social conditions (as covered in this Code)
- Prohibit bribery or other means of obtaining an unfair advantage and adhere to anti-corruption laws
- Have procedures in place to cover improper payments, conflicts of interest, extortion and fraud, gifts and hospitality
- 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).

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
- Explore commitment and adoption of science-based targets ([Ambitious corporate climate action - Science Based Targets](#))



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.





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 Advisory, Mindcrest and Connected Services, across our eight key sectors. We seamlessly combine any number of our services to deliver bespoke solutions for our diverse clients.

[dwfgroup.com](https://www.dwfgroup.com)