

STATEMENT OF CORE RESPONSIBLE BUSINESS PRINCIPLES

Operating our business in a responsible manner for the benefit of our own people, our clients and our suppliers, and in a way which makes a positive contribution to the wider community and to the environment is important to us.

The commitment we have made to being a responsible business is a core value that lies at the heart of the organisation we wish to be and at the centre of the culture we aspire to have. It is the foundation upon which our business is built and off which our legal services are provided.

Collectively we have committed to: being a responsible business in everything that we do; focusing our efforts on the areas where we can make the biggest difference or have the most impact; seeking incremental improvements as and where necessary; and encouraging all those with whom we come into contact to operate their own businesses in the same manner.

We do not get everything right all the time (no-one does), but we always try to 'do the right thing'. Below is a 'snap shot' of the approach we adopt in some of the areas where our commitment to being a responsible business manifests itself in the day to day life of the firm.

1 Business conduct

- The United Nations Guiding Principles on Business and Human Rights ask businesses to embrace, support and within their respective spheres of influence give effect to a set of core values in the areas of human rights, labour standards, the environment and anti-corruption. We support the aims of the UN Global Compact and work hard to reflect them in our own business.
- We operate our business in compliance with applicable laws and regulations and to the highest ethical standards. We are committed to complying not only with the letter but also with the spirit behind laws and regulations which govern our business and activities.
- We do not seek a competitive or other advantage in business for ourselves or our clients through the use of illegal or unethical business practices, and we will never knowingly advise a client to commit an illegal act.
- Our people are encouraged to raise concerns at the earliest opportunity so that issues can be addressed before they become problems. We have in place 'whistleblowing' arrangements which someone who feels uncomfortable about reporting a particular matter through normal channels can use. We prohibit retaliation against or the victimisation of a firm member who has reported a possible violation of law, regulation, ethics or firm policy.

2 Financial crime

- We recognise that financial crime has a debilitating effect on countries, economies and societies, and that it also has significant financial and other consequences for its victims.

- We acknowledge that as lawyers we have both a legal and a moral responsibility not to assist the perpetrators of financial crimes with their illegal activities or help them to launder the proceeds of their crimes, and, in certain circumstances, to report their activities to a law enforcement agency.
- We operate systems and processes which are designed to identify financial crime and those who perpetrate it in all its forms, including, but not limited to, bribery, corruption, money laundering, terrorist financing, cybercrime and violations of sanctions.

3 Information security

- Laws and regulations which govern or protect information (including personal data) that apply to us or to our activities or services we comply with in relation to both information that we use in our own business and information that we acquire or create when providing legal services to our clients.
- We also comply with the professional obligations of confidentiality that are a fundamental feature of the lawyer-client relationship and respect any legal or other privilege of which we are aware.
- We use systems, processes and technology to keep the information we receive, store and process secure, and to minimise the likelihood of a deliberate or an unintentional information security breach occurring.

4 Human rights

- The United Nations Guiding Principles on Business and Human Rights state that all businesses have a responsibility to respect human rights. We respect internationally recognised human rights as part of our commitment to support the UN Global Compact.
- In addition to complying with the human rights related laws that govern our own business and the human rights related legal work that we conduct for our paying clients, we also seek to promote, support and protect human rights through our pro bono activities, many of which focus on satisfying unmet needs for legal advice, facilitating access to justice or righting miscarriages of justice.

5 Forced labour

- We do not engage in slavery or human trafficking or use forced, bonded, involuntary or child labour in our own business.
- We never knowingly retain suppliers who engage in slavery or human trafficking or who use forced labour in their businesses.
- We encourage our key suppliers to work with us to ensure that such practices are not present in our respective businesses and supply chains.

6 Equality and diversity

- We recognise that a diverse workforce gives us access to different cultures, experiences and views, which in turn benefit our own business and our clients.

- We acknowledge that respecting and promoting equality and diversity must go beyond mere compliance with laws and regulations and that such values should be embedded into the fabric and culture of our business.
- Equality of opportunity, respect for diversity and the right of everyone to work in an environment which promotes fairness and is free from prejudice and discrimination are important values that we expect all our people to adhere to.
- We try hard to cultivate an inclusive working environment where everyone can work and succeed based solely on merit, and without being disadvantaged by prejudices relating to race, nationality, religion, belief, gender, sexual orientation, marital status, pregnancy, paternity, adoption, disability, age, social background or political opinion.

7 Health and safety

- We treat health and safety seriously and take steps to ensure that our offices provide a safe environment not only for our own people, but also for everyone else who uses them, including clients, suppliers and other visitors.
- We operate systems and processes which comply with legal and regulatory requirements and follow best practice principles in respect of office buildings and clerical work.
- All our people have access to a wellness programme which includes a range of benefits and initiatives the aim of which is to keep them fit and healthy.

8 Employment practices

- Our employment practices and working arrangements comply with relevant laws and regulations and follow best practice principles in the legal profession.
- We respect our people and try always to treat them fairly. We wish them to be content in their work and to feel appropriately remunerated for their efforts. The training opportunities we make available help them to fulfil their career aspirations. The flexible working arrangements we also offer help them to find a work life balance that suits them and us. A wide range of fixed and flexible benefits, a comprehensive wellness programme and an active programme of pro bono and charitable activities are also open to everyone.
- Bullying, harassment and discrimination are not tolerated. We encourage our people to have regard to the welfare of co-workers. Arrangements are in place to facilitate the raising of concerns or issues, including for 'whistleblowing' purposes. Counselling services are available to everyone.

9 Pro bono activities

- We are committed to working free of charge for the public good by providing pro bono assistance to people who need legal services but cannot afford them. We encourage all our people to engage in pro bono activities within the parameters of the firm's policy, and we fully support those that do so.
- To ensure that our pro bono activities are deployed effectively and in a manner that maximises their impact, we normally focus them on an area of the law in which we practice and can thus add value or, alternatively, on matters which

have a wider public interest aspect to them, for example, cases involving issues relating to the rule of law, the administration of justice, internationally accepted human rights, access to justice or the righting of miscarriages of justice.

- Our pro bono activities are many and varied and range from working closely with leading advice agencies on an on-going basis to supporting particular charities or non-governmental organisations on a regular basis to conducting individual cases or advising on discrete matters on a one-off basis.

10 Charities and community organisations

- Our responsible business programme includes a commitment to support the work of charities and other not for profit community focused organisations. We encourage our people to do that, and in particular to participate in the charitable and community based activities that we organise on a regular basis.
- All our people are invited to nominate charities for the firm to support for what is normally a two year period. The charities which are chosen as firm charities are supported in a number of different ways, including through donations of money, a wide range of fund raising activities, and pro bono assistance.
- To enable everyone to participate in such activities, including non-lawyers, we also support community organisations through more practically focused initiatives and projects, which range from reading to children in schools to helping to renovate the homes of families with disabled children.

11 Environmental impact

- We work hard to minimise the impact our business has on the planet by being aware of the need to minimise our use of water, energy and raw materials, and by seeking to maximise our use of alternative sources of energy and renewable and recyclable materials, where they are available.
- For example: we encourage a 'less paper' working environment, where possible and practicable (through increased use of online legal resources, e-filing, and duplex printing); we use energy saving products, where available (such as low energy light bulbs and timer light switches); we purchase recycled products, where available (such as paper and ink toner cartridges); and we use sustainable procurement methods, where available (such as recycled lever arch files and tap water rather than bottled water).
- The supplier we use to dispose of regular waste recycles it to the maximum extent possible and provides us with regular reports so that we can monitor the process and progress. The supplier we use to dispose of hazardous waste disposes of it in an environmentally friendly manner which complies with relevant laws and regulations.

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