

KINGSLEY NAPLEY

STATEMENT OF CORE RESPONSIBLE BUSINESS PRINCIPLES

Operating our business in a responsible way, for the benefit of our people, clients and suppliers, and in a manner that 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 which lies at the heart of the organisation we wish to be and at the centre of the culture we aspire to have.

Collectively, we have committed to: being a responsible business in everything we do; focusing our efforts on 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 we work hard to reflect them in our own business.
- We always try to 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 of, but also with the spirit behind, the laws and regulations which govern our business, activities and people.
- We do not seek a financial, competitive or other advantage in business for ourselves or for our clients through the use of illegal or unethical business practices. We will never knowingly engage in or facilitate, or advise a client to commit, an illegal act.
- Our people are encouraged to raise issues or concerns at the earliest opportunity so they can be addressed before they become problems. Someone who feels uncomfortable about reporting a matter through normal channels can do that by using the whistleblowing arrangements we have put in place. Retaliation against or victimisation of a firm member who has reported a possible violation of law, regulation, ethics or firm policy is expressly prohibited.

2 Financial crime

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

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

3 Information security

- Laws and regulations governing or protecting confidential information, including personal data, which apply to us we comply with when managing our own business and when we provide legal services to our clients.
- We also comply with the professional obligation of confidentiality that is a fundamental feature of the lawyer-client relationship and respect any legal or other privilege which might also apply in certain circumstances.
- We use systems, processes and technology to keep the information we receive, store and process secure, and to minimise the likelihood of an 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 and through adherence to the professional duties lawyers have to uphold the rule of law and facilitate the administration of justice.
- In addition to complying with the human rights related laws which govern our own business and the human rights related legal work which we carry out for our paying clients, we also seek to promote, protect and facilitate access to or the enforcement of human rights through our pro bono activities.
- Many of the cases we undertake for no reward we agree to take on because it satisfies an unmet need for access to the fundamental right to receive legal advice or legal representation, or because they serve the public interest, feature a point of law of public importance or involve a potential miscarriage 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 also never knowingly retain suppliers who engage in slavery or human trafficking or use forced labour in their businesses.
- We encourage key suppliers to work with us to ensure that such practices are not present in our respective businesses or in our supply chains.

6 Equality and diversity

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

- We also recognise that respecting and promoting equality and diversity must go beyond mere compliance with laws and regulations and that such values must 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 everyone 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

- Our health and safety obligations are taken seriously and we have taken steps to ensure that our office provides a safe environment for our own people and for everyone else who uses it, including clients, suppliers and other visitors.
- We do this by operating systems and processes which comply with legal and regulatory requirements and by following best practice principles in respect of office buildings and clerical work.
- Everyone who works for us has access to a wellness programme which offers a wide range of benefits and initiatives to help keep them fit and healthy.

8 Employment practices

- We respect our people and always try to treat them fairly. Our recruitment processes, employment practices and working arrangements comply with relevant laws and regulations and follow best practice principles in the legal profession.
- We wish our people to be content in their work and to feel appropriately remunerated for their efforts. We are a signatory to the Charter of the London Living Wage Foundation which requires everyone working in London to be paid not just the national minimum wage but a living wage for London. Our employees are paid more than the mandatory national minimum wage and at or above the voluntary London living wage, which is higher. We have engaged with key suppliers who operate in low paying sectors of the economy (such as cleaning, catering and security) to ensure, and we have received written commitments from each of them confirming, that those of their people who they deploy to work for us are also paid at least the London Living Wage.
- The wide range of training opportunities we make available to everyone help them to fulfil their career aspirations. The flexible working arrangements which we also offer help them to find a work life balance which suits them and us. A comprehensive package of fixed and flexible benefits is also open to everyone.
- We do not tolerate bullying, harassment or discrimination. We also encourage our people to have regard to the welfare of co-workers. Arrangements are in place to facilitate the raising of concerns or issues. Professional counselling services are also 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, normally we focus them on an area of the law in which we practice and can thus add value or, alternatively, on matters which have a 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 everyone to do that, and in particular to participate in the charitable and community-based activities which we organise on a regular basis.
- 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 ways, including through donations of money, fundraising activities and/or pro bono legal assistance.
- To enable everyone to participate in such activities, including non-lawyers, we also support community organisations which have practically focused initiatives and projects. Examples range from reading to children in schools to helping to renovate the homes and gardens of families with disabled children.

11 Environmental impact

- Protecting the planet, its resources and the environment, and helping to combat climate change by reducing our carbon footprint, are important to us.
- We are committed to reducing the environmental impact of our business and to continually and incrementally improving our environmental performance through a broad range of initiatives, and by embedding sustainability considerations into our strategy, operations and purchasing decisions.
- We are ISO accredited for environmental purposes, a member of the Legal Sustainability Alliance and a signatory to the Greener Litigation Pledge.

Kingsley Napley LLP

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