

SUPPLIER
CODE OF
CONDUCT

Kingsley Napley LLP

KINGSLEY
NAPLEY



PURPOSE

Kingsley Napley LLP is committed to the highest standards of good and ethical business behaviour. This Supplier Code of Conduct ("Code") sets out the standards and expectations that Kingsley Napley LLP ("KN") requires all suppliers, vendors, contractors, and service providers ("Suppliers") to meet when conducting business with or on behalf of KN.

KN is committed to conducting business ethically, responsibly, and in compliance with all applicable laws and regulations. We expect our Suppliers to share these values and demonstrate the same commitment to ethical business practices, integrity, and social responsibility.

By engaging with KN, Suppliers acknowledge their understanding of and agreement to comply with this Code.

APPLICATION

Suppliers must ensure that all of their representatives, including employees, agents, subsidiaries, affiliates, suppliers, advisors and subcontractors, which for the purposes of this Code shall be included in all references to the 'Supplier', conduct business with and/or on behalf of the Firm in accordance with this Supplier Code of Conduct.

LEGAL COMPLIANCE AND BUSINESS INTEGRITY

Compliance with Laws

Suppliers must comply with all applicable laws, regulations, and industry standards in the jurisdictions where they and we operate. This will include but is not limited to the areas which are covered in this Code of Conduct.

As a regulated entity, we also require that our Suppliers do not do anything or omit to do anything which would result in our breach of the regulations that are applicable to us as a law firm.

Business Ethics

Suppliers must at all times, conduct business with honesty, integrity, and transparency and must always compete fairly and ethically in the marketplace, never engaging in any form of fraudulent, deceptive or misleading practices. All Suppliers must be alive to and avoid all conflicts of interest in providing goods or services to KN. In the event that any actual, potential or perceived conflict of interest should arise, then this should promptly be discussed with KN.



Anti-bribery and Corruption

Suppliers must comply with all applicable anti-bribery and corruption laws including but not limited to the UK Bribery Act 2010, and must maintain policies and procedures which are designed to promote and achieve compliance with such laws.

Supplier must not offer, promise, give, request, or accept bribes, kickbacks, improper payments or any item of value of any kind, whether directly or indirectly to any person, including government officials, public officials, or any director, officer, employee or agent of a commercial customer or supplier for the purposes of obtaining or retaining business, securing an improper business advantage or inducing the recipient to perform a job function improperly. For the avoidance of doubt, items of value may include (but is not limited to) gifts, hospitality, entertainment or travel.

The Supplier must ensure that all of their expenditures are reasonable and done in the ordinary and proper course of business. No discounts, loans or funding should be used to disguise any improper facilitation payments, whether made or given directly by the Supplier or through a third party under the instructions of the Supplier.

Modern Slavery Act

The Supplier shall at all times comply with its obligations under the Modern Slavery Act 2010, and understands the consequences of a failure to comply. KN expects that all Suppliers undertake due diligence processes on their supply chains in order to ensure that they are free from modern slavery and/or human trafficking.

Employment Practices

The Supplier, as a minimum must uphold the following standards both in its own business, but also within its supply chain:

- Provide a safe working environment for all staff and subcontractors;
- Do not use slaves, forced or bonded labour or child labour;
- Ensure and validate that all employees and the employees of subcontractors have the legal right to work in the country where the services are to be performed;
- Support fair labour practices, including the right to belong to a trade union, the payment of at least the legal minimum wage where such exists and a fair living wage where it does not. KN asks that all Suppliers ensure that they pay any staff supporting KN at a level which does not fall below the London Living Wage (or where appropriate the UK Living Wage) Rates;



- Ensure respect for the dignity of individuals at work and zero tolerance for the harassment of individuals in any form and for any reason;
- Provide a confidential and secure mechanism for employees to raise grievances;
- Comply with all applicable laws relating to working hours, rest periods and public holidays; and
- Refrain from discrimination against employees or potential employees on the basis of their race, colour, nationality, ethnic origin, caste, gender, gender reassignment status, marital status, disability, age, religion, belief, membership or non-membership of a trade union or sexual orientation. Issues of disability should only be considered against the particular requirements of the job.

Environmental Compliance

The Supplier must act responsibly towards the environment and is encouraged to implement environmental policies that address environmental impacts and outlines measures to mitigate them.

We expect that all Suppliers will comply with all applicable environmental laws and regulations, obtain and maintain all required environmental permits and licences and monitor and report environmental performance as required by law.

If you have more than 250 employees or £36 million in revenue, the following also apply:

- You commit to setting emission reduction targets aligned with the latest climate science by 2030.
- You measure and report your carbon footprint (at a minimum Scope 1 and 2 emissions) and disclose publicly or share with us directly.

Sustainable Practices

KN recognises the important role that business has to play in driving growth in the global marketplace and believes that businesses must accept the responsibility to ensure that growth is achieved in a sustainable manner, promoting socio economic development to try to tackle poverty whilst protecting and enhancing quality of life and avoiding detrimental impacts on any part of the global population or environment.

KN looks to the supply chain as a key area through which to secure sustainability and requires the Supplier to take these issues seriously by abiding by relevant international, European or national standards or commitments and being able to prove its sustainability credentials if asked.



Data Protection and Privacy

Suppliers must comply with all applicable data protection and privacy laws, which provide for the protection, transfer, access and storage of personal data.

Confidentiality

The Supplier must not utilise or disclose KN confidential information. This includes, but is not limited to, client information, supplier information, knowledge of business plans or projections, sales or marketing programmes and client lists or any information or data that could reasonably be expected to be treated as confidential by its nature.

General

All Suppliers must ensure that they maintain accurate books, records, and accounts in order to be able to demonstrate compliance with this Code of Conduct.

In the event of a breach of any of the terms of this Code of Conduct, then this should be reported to KN promptly and KN reserves the right to terminate the contract and relationship with any Suppliers that are in breach of these obligations.

Kingsley Napley

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