

# Supplier Code of Conduct



January 2021

## 1 Introduction

At Travers Smith, our aim is to provide the very highest quality of service whilst ensuring that our business is conducted in an ethical way. We expect our suppliers to meet the same ethical standards to which we hold ourselves, or similar standards equivalent to their particular business sector, throughout the course of their operations.

|                 |  |
|-----------------|--|
| "Employee"      | means any individual who works for a Supplier, whether under a contract of employment or any other contract (written or oral) where an individual undertakes to do personally any work or services for the Supplier. |
| "Supplier"      | means any company, firm or individual that provides a product or service or undertakes any activity for or on behalf of Travers Smith, either directly or indirectly.  |
| "Travers Smith" | means both Travers Smith LLP and Travers Smith Employment Services.  |

## 2 Laws and Ethical Standards

Suppliers shall comply at all times with all laws applicable to their business and will support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national law and practice.

## 3 Slavery and Child Labour

Suppliers shall take all reasonable steps to ensure that slavery, servitude, human trafficking, forced or compulsory labour, and/or child labour do not take

place in their supply chains or in any part of their business (including making all necessary enquiries with their suppliers and, to the extent reasonable, other parties in the supply chain).

Suppliers shall comply with the Modern Slavery Act 2015 and the commitments in Travers Smith's Modern Slavery Act Statement, as well as any other applicable anti-slavery legislation, as updated from time to time.

## 4 Working Hours and Wages

Suppliers shall follow all applicable local laws and regulations in relation to working hours, and all overtime must be voluntary. Employees must be provided with wages that, as a minimum, comply with national laws.

## 5 Non-Discrimination

Suppliers shall not discriminate on the basis of race, religion, ethnicity, disability, age, sexual orientation, political affiliation, union membership, gender or marital status. Suppliers shall provide a workplace free of inhumane and degrading treatment, including sexual harassment, sexual abuse, corporal punishment, mental, physical or verbal abuses of Employees and with no threats of such treatment.

Suppliers shall take steps to ensure they are striving for the highest standards of support for Employees from minority and/or under-represented groups, such as BAME people, women, LGBT+ people, people with disabilities, etc. We would encourage Suppliers to work with external bodies such as Stonewall, BITC, Working Families, Mind, etc., to develop these standards, and also where appropriate to work towards achieving diversity and inclusion-related accreditations, such as Disability Confident employer, Mental Health at Work Commitment, 30% Club, Stonewall Diversity Champion, etc.

## 6 Anti-Bribery and Corruption

---

Suppliers must never, directly or through their intermediaries, offer, promise or receive any personal or improper advantage in order to obtain or retain a business or other advantage from a third party. Suppliers must not pay or receive bribes or kickbacks and shall not take any actions to violate, or cause their business partners to violate, any applicable anti-bribery laws and regulations (including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act).

## 7 Tax Evasion

---

Suppliers must not evade paying tax or knowingly assist others to evade taxes. "Tax evasion" generally refers to the illegal evasion of taxes where individuals or organisations dishonestly or fraudulently under-declare their taxes.

## 8 Health and Safety

---

We expect Suppliers at all times to strive for the highest standards of occupational health and safety. Suppliers shall comply with all applicable occupational health and safety regulations and provide a work environment that maintains the health of employees and prevents accidents, injuries and work-related illnesses.

## 9 Environment

---

Suppliers shall comply with all applicable environmental laws, regulations and standards and maintain effective systems to identify and eliminate potential hazards to the environment, promote energy efficiency and minimise unnecessary waste and carbon emissions.

## 10 Animal Welfare

---

We expect Suppliers at all times to comply with all applicable laws in relation to the welfare of animals, including but not limited to the standards and guidance specified under the UK's Animal Welfare Act 2006 (which is designed to protect animal welfare on farms, in transport, at market and at slaughter).

## 11 Sustainability

---

We encourage all of our Suppliers to source their products sustainably and, where applicable and reasonable to do so, to use locally sourced produce. Where possible, Suppliers should seek to support their local communities and work with local charities and enterprises.

## 12 Conflicts of Interest

---

Suppliers shall immediately report any situation which, in relation to their business with Travers Smith, appears to be a conflict of interest to Travers Smith and disclose if they become aware that any Travers Smith staff or professional under contract with Travers Smith may have a conflicting interest of any kind in the Supplier's business.

## 13 Freedom of Association and Collective Bargaining

---

Suppliers shall grant Employees the right to freedom of association and collective bargaining in accordance with all applicable laws and regulations.

## 14 Third Party Communication

---

Suppliers shall communicate the principles stated in this Supplier Policy to their sub-contractors and other business partners who are involved in supplying the products and services described in the main contract to Travers Smith. Suppliers shall take reasonable steps to ensure that such parties adhere to the same or similar standards.

## 15 Monitoring

---

The Operations Committee will review this Supplier Policy on an ongoing basis and will highlight any areas of improvement, issues or areas of concern.

Suppliers shall co-operate fully with Travers Smith in any investigations or reviews relating to compliance with this Supplier Policy.

This Supplier Policy will be reviewed and updated as appropriate on an ongoing basis and published on our website, at [www.traverssmith.com](http://www.traverssmith.com).

## 16 Notification

---

Suppliers shall notify Travers Smith immediately in writing if they become aware or have reason to believe that they, or any of their officers, Employees, agents or subcontractors, have breached or have potentially breached any of the Supplier's obligations under this Supplier Policy or any similar policies or procedures.

Any material breach of the obligations stipulated in this Supplier Policy may result in Travers Smith ceasing to work with the Supplier in breach.