

Supplier Code of Conduct



December 2024

This Supplier Code of Conduct applies to all third-party individuals and organisations who provide goods or services to Travers Smith LLP ("Travers Smith"/"we"/"us"/"our") or who undertake any activity on our behalf, either directly or indirectly ("Suppliers"). All Suppliers contracting with us are expected to meet the same ethical standards to which we hold ourselves, or equivalent standards that are relevant to their business sector.



INTRODUCTION AND OUR EXPECTATIONS

- 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 understand that our supply chain accounts for a significant part of our impact on the environment and society. Our aim is to promote best practices and drive accountability and transparency across our Supplier relationships, for the mutual benefit of all involved.
- Whilst we recognise that our Suppliers operate in many different cultural environments, this Code sets out the minimum standards that we expect our Suppliers to observe. The Code has been drafted with reference to the principles set out in the [United Nations Global Compact](#), the UN Universal Declaration of Human Rights, and the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, and in accordance with national law and practice.
- Suppliers are expected to communicate the principles stated in this Code across their own supply chains where their subsidiaries, subcontractors and other business partners are involved in supplying goods or services to Travers Smith, and to take reasonable steps to ensure that such parties adhere to the Code's requirements.
- This Supplier Code of Conduct will be reviewed and updated as appropriate on an ongoing basis and published on our website, <http://www.traverssmith.com>.



WORKING WITH SUPPLIERS TO MEET THE CODE'S STANDARDS

- To enable us to have a clear overview of the performance of our Suppliers as against the requirements of this Code, we invite all of our Suppliers to join the Sustainability Intelligence Suite that has been developed by [EcoVadis](#) on behalf of Travers Smith.
- By carefully monitoring our supplier base, we aim to identify areas of non-compliance and opportunities for us to exert our influence to ensure that environmental, social, and ethical sustainability standards are high on our Suppliers' agendas.
- Travers Smith reserves the right to refuse to work (or to continue working) with Suppliers who are not prepared to participate in the Sustainability Intelligence Suite or who are unable to demonstrate continued progress towards meeting the requirements of this Code of Conduct.
- We encourage positive, active account management and open communication with all Suppliers throughout the term of our relationship with them.
- Suppliers must co-operate fully with Travers Smith in any investigations or reviews relating to their compliance with this Code of Conduct. Any known or suspected breach of the Code must be reported promptly to Travers Smith.
- Where any breach of this Code is identified, Suppliers must take all reasonable measures to remedy such breach as soon as possible.



LABOUR AND HUMAN RIGHTS

- Suppliers are expected to support and respect the protection of internationally proclaimed human rights, guided by fundamental principles such as the [United Nations Universal Declaration of Human Rights](#) and the [International Labour Organisation \(ILO\)](#).
- Suppliers should ensure that they are not complicit in human rights abuses and that they do not work with third parties who have poor human rights records.

Slavery and Child Labour

- Suppliers shall take all reasonable steps and make all necessary enquiries 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.
- Suppliers shall adhere to minimum age provisions set by national laws and shall require the same throughout their supply chain. Where applicable national laws fall short of generally accepted international standards, Suppliers shall seek to observe international standards.
- 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.

Community Rights

- Suppliers shall respect community rights, such as land usage rights and the right to a safe environment and avoid negative impacts on the local communities within which they operate.

Working Hours and Wages

- Suppliers shall follow all applicable local laws and regulations in relation to working hours, and all overtime must be voluntary.
- Supplier employees must be provided with wages that, as a minimum, comply with the Living Wage relevant to their specific location and applicable national laws. Wage reductions or the imposition of additional hours shall not be used as disciplinary measures.
- Suppliers shall not seek to prevent employees from exercising their legal or contractual rights and must prescribe working hours which are compliant with international conventions.

Non-Discrimination

- Suppliers shall ensure compliance with the Equality Act 2010, have a zero-tolerance approach to discriminatory practices, and provide training to all of their employees on equality, diversity and inclusion principles.
- 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, bullying, mental, physical, or verbal abuse (and free of any threats of such treatment).
- Suppliers are expected to promote gender equality and women's empowerment, and to take steps to ensure that they are striving for the highest standards of support for employees from minority and/or under-represented groups, such as BAME people, LGBTQ+ people, people with disabilities, etc.
- We encourage Suppliers to work with external bodies such as Stonewall, BITC, Working Families, Mind, etc., to develop appropriate policies and also, where appropriate, to work towards achieving diversity and inclusion-related accreditations, such as by becoming a Disability Confident employer, making a Mental Health at Work Commitment, joining the 30% Club, becoming a Stonewall Diversity Champion, etc.

Harassment at Work

- Suppliers shall foster a respectful, dignified work environment free from all forms of harassment, sexual harassment and bullying. This should involve taking all necessary measures such as implementing comprehensive policies, ensuring unacceptable behaviour is clearly defined, maintaining an effective complaints procedure, safeguarding whistleblowers, and promoting a culture of accountability.

Wellbeing

- Suppliers are expected to take a proactive approach to the positive wellbeing of their employees and supply chain partners and to play a leading role in building an inclusive culture.
- There should be an emphasis on promoting a healthy work-life balance, the provision of employee benefits that enhance wellbeing (such as an employee assistance program), and consideration of mental health awareness schemes and support.

Health and Safety

- We expect Suppliers to strive for the highest standards of occupational health and safety. Suppliers shall comply with all applicable occupational health and safety laws, regulations, and best practice guidelines.
- Supplier work environments must operate in a way that maintains the health and welfare of the Supplier's employees and that prevents accidents, injuries, and work-related illnesses. Suppliers must inform Travers Smith should any of their products or services breach UK-accepted safety standards or guidelines.

Freedom of Association and Collective Bargaining

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



BUSINESS ETHICS

Anti-Bribery and Corruption

- Suppliers must never, whether directly or through their intermediaries, offer, promise, or receive any personal or improper advantage 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 Travers Smith or any of their other business partners to violate, any applicable anti-bribery and corruption or anti-financial crime laws and regulations (including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act).
- Suppliers should have their own anti-corruption policy and related procedures in place that seek to prohibit any form of bribery, corruption, extortion, or other similar unethical practice.

Supply Chain Diversity

- We recognise the value and benefits of working with small and diverse businesses, and we see supplier diversity as important to our success. We encourage Suppliers to provide opportunities for such businesses to participate in their supply chain.

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.

Sanctions

- Suppliers must not breach sanctions or export controls and shall not take any actions to violate, or cause Travers Smith or any of their other business partners to violate, any applicable sanctions and export control laws (including those imposed by the UN, UK or US).

Conflicts of Interest

- Suppliers shall immediately report to Travers Smith any situation which, in relation to their business with us, appears to present a conflict of interest.
- Suppliers shall immediately inform us if they become aware that any individual working for Travers Smith or any professional otherwise under contract with Travers Smith may have a conflicting interest of any kind in the Supplier's business.



ENVIRONMENT

- Suppliers must, as an absolute minimum, comply with all applicable environmental laws, regulations and standards and maintain effective systems to identify and eliminate potential hazards to human health and/or the environment from pollution and waste.
- Suppliers are expected to integrate into their processes systems that are intended to prevent pollution, control raw material usage, avoid unnecessary waste, promote energy efficiency, minimise carbon emissions and promote biodiversity.
- Suppliers are encouraged to join collaborative, industry-wide efforts to share best practices, with the aim of helping reduce negative effects on the environment and the natural world, in particular with regards to production processes.

Carbon Reduction and Environmental Management

- Suppliers should, as appropriate, complete an Environmental Impact Assessment in respect of their operations, so as to identify and mitigate any aspects that are likely to have a significant negative effect on the environment.
- Suppliers should have the ability to review energy performance and continuously strive to reduce their energy usage and carbon footprint.

- Suppliers are required to demonstrate environmental policies and management systems sufficient to ensure continuous improvement in environmental performance and promote greater environmental responsibility.
- Suppliers should review the degree to which products and services have been designed with environmental considerations in mind.

Hazardous Waste

- Suppliers must appropriately manage the storage, use, transport, and disposal of hazardous waste to reduce the risk of harm or damage to the environment or human health.

Waste Reduction and Circular Economy

- Suppliers should aim to implement a waste hierarchy that includes the following steps: waste assessment; reduction planning; emergency response; separation at source; and disposal (covering recycling, composting and energy recovery).
- Suppliers should use products which can be re-used, recycled or used in an energy-efficient manner, with a view to reducing negative impacts on the environment at all stages of the supply chain.
- Where reasonably possible, Suppliers should implement a circular economy, in which waste is used in place of raw materials to manufacture products.

Animal Welfare

- We expect Suppliers to comply at all times 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).

Sustainability

- We encourage all our Suppliers to use life cycle assessments when sourcing materials, products, and services to help prevent the destruction of natural or physical resources.
- Suppliers should seek to support their local communities and work with local charities and enterprises, and (where applicable and reasonable to do so), should look to use locally sourced produce.



INFORMATION SECURITY, DATA PROTECTION, BUSINESS CONTINUITY AND INCIDENT REPORTING

Information Security

- Suppliers must comply with the terms of any separate confidentiality undertaking agreed with Travers Smith that governs the use of our information.
- Suppliers must ensure that appropriate safeguards are in place to protect the confidentiality, integrity and availability of our information in all its forms (including digital, paper, voice recordings etc.) and must ensure that their staff and those working in their supply chains are appropriately trained on how to keep information safe.
- Suppliers must have in place appropriate governance and risk management processes to ensure that access within their organisation to our information is granted only on a need to know, least privilege basis and that any incidents are dealt with promptly and effectively.
- Suppliers should work toward adopting industry best practices and frameworks including by way of obtaining certifications such as Cyber Essentials and ISO 27001 and SOC 2 Type 2.
- Suppliers should take a responsible approach to the use of public information for the purpose of training artificial intelligence ("AI") models, such as large language models, or algorithms, and must provide us with advance notice of any proposed usage of AI tools in connection with the provision of goods and/or services to Travers Smith.

Data Protection

- Suppliers must observe all information and security standards that are notified to them by Travers Smith and comply with all applicable laws concerning the protection of personal data belonging to their employees and to third parties.

Business Continuity

- Suppliers should have appropriate business continuity and disaster recovery plans in place to ensure they can continue to provide services to us in the event of any disruption to their operations. Plans should be developed, maintained and tested in accordance with applicable regulatory, contractual and service level requirements.

- Where applicable, business continuity and disaster recovery plans should extend to cover the operations of a Supplier's own supply chain.

Incident Reporting

- Suppliers must promptly notify us of suspected or actual security or data breaches, any incidents that involve the loss of our information, or any disruption or likely disruption to services that may be caused by an incident. Notifications via email should be sent to: security.notifications@traverssmith.com.



GOVERNANCE

Supplier Code of Conduct, 40582592

Account Management

- Suppliers should take a proactive approach to working with Travers Smith on account management and should ensure that we are promptly notified of any proposed changes to contractual documentation, key contacts or the Supplier's ownership or control structure. Suppliers must also notify us of any material risks that may impact upon the provision of goods or services to us.

Branding

- The Travers Smith brand encompasses our name, logo and/or any other identifier specific to us (for instance, references to our social media platforms).
- Travers Smith does not ordinarily endorse or recommend any third-party brands, services, or products. Suppliers are not permitted to disclose that they are providing services or products to Travers Smith without our prior written consent.

FOR FURTHER INFORMATION, PLEASE CONTACT



Paul Mullis
Workplace Compliance Manager
paul.mullis@traverssmith.com
+44 (0)20 7295 3127



Connor Keown
Contracts and Supplier Manager
connor.keown@traverssmith.com
+44 (0)20 7295 3643