

Responsible Procurement Programme

Financial Year 2024/25

July 2025



The Responsible Procurement Programme applies to all employees of Travers Smith LLP ("Travers Smith"/"we"/"us"/"our"), individuals who manage supplier contracts ("Contract Owner"), and third-party individuals and organisations who provide goods or services to the firm or who undertake any activity on our behalf, either directly or indirectly ("Suppliers").

INTRODUCTION

- At Travers Smith, we believe that sustainability does not end at the doors of our offices, rather we consider our Suppliers and business partners an integral part of our overall sustainability approach.
- It is essential to us that our supply chain aligns to our core values and that we partner with organisations who share and contribute to our passion for sustainable, transparent, and responsible business practices.
- Through the application of Environmental, Social, and Governance ("ESG") assessments, externally verified ESG scorecards, and common procedures throughout the firm, we seek to monitor risk within our supply chain in a proactive manner.
- This Programme has been carefully drafted and implemented in alignment with the ISO 20400:2017 guidance standard, ensuring an integrative approach towards sustainable procurement that considers the social, economic, and environmental impacts throughout the procurement lifecycle.
- The Programme will be reviewed and updated as appropriate, and a report will be generated on annual basis to record performance against the targets set in the previous financial year.

ROLES & RESPONSIBILITIES

- Procurement has responsibility for this Programme. It supports Contract Owners in delivering responsible supply chains, identifies ESG risks, and connects with EcoVadis, Contract Owners, the ESG Manager, and Suppliers. Procurement also provides specialist training, ensuring the integration of scorecards and ESG strategy in commercial reviews, including ESG terms in contracts, whilst serving as the escalation point for ESG concerns.
- Contract Owners are first-line ESG risk owners, responsible for reviewing EcoVadis scorecards, discussing outcomes with Suppliers, fostering proactive discussions on ESG performance, and championing the Programme to Suppliers.
- The ESG Manager reviews ESG assessments to identify areas of risk and concern, collaborating with stakeholders to address and advise on ESG supply chain risks effectively.

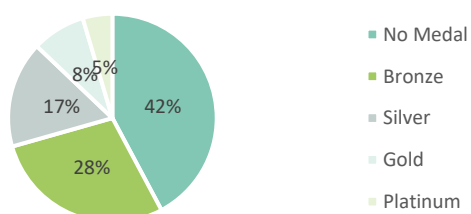
DUE DILIGENCE PROCESS

- All Suppliers who exceed £25,000 annual spend are expected to complete an ESG assessment upon onboarding or at renewal. This ESG assessment allows the firm to understand at a high-level the ESG risk associated with its supply chain, and to develop mitigation strategies where appropriate.

- Suppliers who have a previous ESG assessment that indicated a risk, are located in a higher-risk jurisdiction, or are a manufacturer, are required to complete an ESG assessment regardless of the level of spend. Any Supplier considered to be of a higher risk will also be assigned additional points to the supplier management risk score.¹
- If a risk is identified, the ESG Manager assesses the likelihood and consequences of the risk occurring and advises the Contract Owner of any next steps and where appropriate, may escalate to the Risk Committee.

INDEPENDENT RATINGS & MONITORING

- Travers Smith partners with EcoVadis, an independent ESG ratings agency. Suppliers are requested to provide evidence of policies, processes and controls they have in place. The evidence is then assessed against a range of factors, grouped into four themes: environment, labour & human rights, ethics and sustainable procurement.
- Any areas of improvement identified may result in a 'corrective action plan' issued on the EcoVadis platform and are used to prioritise areas for change. The firm expects Suppliers to engage constructively and demonstrate a willingness to remedy issues in a timely manner. Where necessary, the firm may elect to perform an on-site audit for those Suppliers who are considered to be at the highest risk or have the most areas for improvement.
- The firm reserves the right to refuse to work, or to continue working, with Suppliers who are not prepared to participate in the EcoVadis assessment or who are unable or unwilling to demonstrate sufficient progress aligning to our own principles.
- The chart below shows the breakdown of all the Suppliers within our portfolio and whether they achieve a medal (score >50)², including bronze, silver, gold and platinum.



- 51%** of our PSL Suppliers have a bronze medal or above.

- EcoVadis assesses performance on an annual basis with 55 of our PSL Suppliers³ currently holding a valid scorecard and 19 'In Progress'.
- Since the submission of their latest re-assessment:
 - 69%** of our Suppliers scores have improved;
 - 8%** of our Suppliers scores remained the same;
 - 22%** of our suppliers scores have decreased.
- EcoVadis has recently changed its [methodology](#) to reflect changes in global ESG standards having an impact on many of the re-submissions.
- The firm regularly monitors Suppliers through various due diligence platforms. Where the assessment, EcoVadis scorecard, or the wider supplier governance, indicates an area of poor performance or general concern, then we may elect to conduct further review on the Supplier.

FOCUS AREAS & EXPECTATIONS

- Suppliers, where requested, should commit to completing an ESG assessment, and maintaining an up-to-date, valid scorecard on the EcoVadis platform. Suppliers are also expected to respond to corrective action plans within a timely manner.
- Suppliers are expected to meet the same ethical standards to which we hold ourselves and are expected to embrace the firm's [Supplier Code of Conduct](#). The firm ensures the Code is captured in the form of a contractual clause, alongside standard-form ethics clauses on anti-bribery, anti-tax evasion, anti-fraud, anti-corruption and modern slavery. We also include the latest version as an appendix to the contract.
- As a London Living Wage employer, the firm expects our Suppliers to commit to a living wage standard and promote fair employment practices where appropriate.
- The firm recognises the value and benefits of working with small and diverse businesses. The firm will be actively looking to provide opportunities for diverse suppliers to participate in our supply chain and will seek to include a diverse range of suppliers where competitive sourcing takes place
- As a firm we seek to work with our PSL Suppliers to understand, manage and reduce the environmental impacts of our supply chain. Suppliers are expected to assist us in obtaining more accurate baseline emissions data directly from them, and promote standards on GHG emissions

¹ For more detail, see the Supplier and Contract Management Policy

² Please refer to EcoVadis website for eligibility criteria

³ PSL Suppliers comprise of our Tier 1, 2, & 3 Suppliers

REVIEWING OUR PROGRESS⁴

Targets from FY 2024/25	
Supplier Code of Conduct	
<ul style="list-style-type: none">Tier 1 Suppliers >75% by spendPSL Suppliers >60% by spend	
ESG Assessment	
<ul style="list-style-type: none">100% assessment completion50% of PSL Suppliers with ESG Assessment	
EcoVadis Assessment	
<ul style="list-style-type: none">Tier 1 Suppliers to 90% by spendPSL Suppliers to 40% by spendIncrease overall score average to 65	
Internal engagement	
<ul style="list-style-type: none">50% Contract Owners trained100% Procurement ethics training	



Supplier Code of Conduct

Tier 1 Suppliers

- 64% of Tier 1 Suppliers have contractually accepted our Code of Conduct or one of equivalence, an increase from 50% in the previous reporting period.
- 55% of Tier 1 Supplier by spend have contractually accepted the Code, an increase from 42% in the previous reporting period.

PSL Suppliers

- 59% of PSL Suppliers have contractually accepted our Code of Conduct or one of equivalence, an increase from 42% in the previous reporting period.
- 54% of PSL Suppliers by spend have contractually accepted the Code, an increase from 45% in the previous reporting period.



ESG Assessment

Assessment completion

- 100% of eligible Suppliers have completed an ESG assessment since its introduction in January 2025.

Existing PSL Suppliers

- 32% of PSL Suppliers have an EcoVadis rating on either the specific company or at group level, an increase from 24% in the previous reporting period



EcoVadis Assessment

Tier 1 Suppliers

- 92% of Tier 1 Suppliers have an EcoVadis rating on either the specific company or at group level, an increase from 88% in the previous reporting period.
- 97% of Tier 1 Suppliers by spend have an EcoVadis rating, an increase from 80% in the previous reporting period.

PSL Suppliers

- 32% of PSL Suppliers have an EcoVadis rating on either the specific company or at group level, an increase from 24% in the previous reporting period.
- 68% of PSL Suppliers by spend have an EcoVadis rating, an increase from 50% in the previous reporting period.

Overall score average

- The current average score of 60 has not changed from the previous reporting period. Whilst it is unfortunate that more progress was not made against this target, a change in the EcoVadis methodology and an increase in the number of scorecards is a likely contributing factor.



Internal engagement

Contract Owner training

- All new starters receive training on slavery and human trafficking as part of their induction programme. In addition, targeted slavery and human trafficking training sessions are provided to those managing supplier contracts where necessary to educate them on the importance of implementing and enforcing effective systems to prevent slavery and human trafficking from taking place in our supply chain.

Procurement ethics training

- The firm commits to ensure that the Procurement team conduct ethics training on an annual basis. The firm's Head of Procurement also holds active MCIPS Chartered status supported by an active CIPS Ethics certification.

⁴ Based on the reporting period 1 July 2024 to 30 June 2025

FURTHER ENHANCEMENT

Targets for FY 2025/26	
Supplier Code of Conduct	
<ul style="list-style-type: none"> Tier 1 Suppliers >80% by spend PSL Suppliers >75% by spend 	
ESG Assessment	
<ul style="list-style-type: none"> 100% of ESG Assessments completed 50% of PSL Suppliers with ESG Assessment 	
EcoVadis Assessment	
<ul style="list-style-type: none"> 100% Tier 1 Supplier coverage 50% Tier 2 Supplier coverage by spend Increase overall score average to 65 	
Internal engagement	
<ul style="list-style-type: none"> Review standard-form terms for ESG provisions 100% Procurement ethics training 	
Supplier diversity programme	
<ul style="list-style-type: none"> Promote diverse and unrepresented groups in our supply chain 	
Supplier decarbonisation programme	
<ul style="list-style-type: none"> Begin the process of baselining our emissions Engage 100% Tier 1 suppliers for emissions data 	



Supplier Code of Conduct

- We aim to continue to push for contractual acceptance of our Code of Conduct by ensuring over 80% of Tier 1 Suppliers uphold our standards and 75% of PSL Suppliers commit to these values.



ESG Assessment

- Our goal is to complete 100% of ESG assessments across our supplier base, with a special focus on ensuring that at least 50% of our PSL suppliers have undergone a comprehensive ESG assessment.



EcoVadis Assessment

- In alignment with our governance objectives, we are enhancing our oversight through EcoVadis assessments. We plan on achieving 100% coverage for Tier 1 Suppliers and targeting 50% spend coverage for Tier 2 Suppliers. Additionally, we aim to boost our overall average EcoVadis score to 65.



Internal engagement

- Recognising that our internal practices drive external success, we will review our standard-form terms to embed robust ESG provisions. We are also dedicated to professional development, ensuring that 100% of our procurement team completes procurement ethics training to support our responsible sourcing initiatives.



Supplier diversity programme

- We value diversity as a cornerstone of innovation and resilience. To that end, our new supplier diversity programme is focused on promoting diverse and underrepresented groups within our supply chain, ensuring that we actively support and give opportunity to these Suppliers.



Supplier decarbonisation programme

- We have developed comprehensive strategies to significantly reduce greenhouse gas (GHG) emissions across our operations. Our commitment includes achieving a 50% reduction in emissions by 2030 and a 90% reduction by 2050, with any remaining emissions removed in accordance with the Oxford Principles for Net Zero.

We have established a robust baseline emissions inventory, capturing current GHG emissions across Scopes 1, 2, & 3. Through this process, we have identified our Tier 1 suppliers as a key source of emissions and are committed to working with them. Our objective is to extend these efforts to all existing and new suppliers.

APPENDIX – KPI SCORECARD

Description	Unit	FY23/24	FY24/25	Status
Contractual capture of TS Code of Conduct - Tier 1	%	50%	64%	^
Contractual capture of TS Code of Conduct - PSL	%	42%	59%	^
Valid EcoVadis Scorecard - Tier 1	%	88%	92%	^
Valid EcoVadis Scorecard - PSL	%	24%	32%	^
Valid EcoVadis Scorecard - Total	#	51	109	^
EcoVadis Scorecard Average	#	60	60	-
Internal KPIs				
ESG Training - Contract Owners	%	0%	20%	^
ESG Training - Procurement	%	100%	100%	^
KPI Performance - PSL Suppliers⁵				
Policy on corruption	%	95%	96%	^
Actions to prevent discrimination and harassment in the workplace	%	90%	93%	^
Measures on employee health & safety issues	%	90%	91%	^
Actions on energy consumption & GHGs	%	85%	87%	^
Grievance mechanism or whistleblowing procedure in place	%	79%	79%	-
Policy on sustainable procurement issues	%	72%	72%	-
Reporting on CO2 emissions	%	72%	72%	-
Reporting on scope 3 GHG emissions	%	62%	64%	^
Quantitative objectives set on environmental issues	%	51%	62%	^
Use of renewable energy	%	60%	64%	^

⁵ Data is based on validated scorecard information on EcoVadis as of 30 June for each reporting period

FOR FURTHER INFORMATION, PLEASE CONTACT



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