



# DLA Piper International

SUPPLIER CODE OF CONDUCT | LAST UPDATED APRIL 2024



# Contents

<b>Introduction.....</b>	<b>3</b>
<b>Requirements and expectations.....</b>	<b>3</b>
DLA PIPER VALUES .....	3
COMPLIANCE WITH LAWS .....	3
HUMAN RIGHTS.....	3
GRIEVANCE MECHANISM .....	3
FORCED LABOUR.....	3
CHILD LABOUR .....	4
COMPENSATION .....	4
WORKING HOURS .....	4
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING .....	4
HEALTH AND SAFETY.....	4
ENVIRONMENT.....	4
ETHICAL BUSINESS PRACTICE .....	5
CONFIDENTIALITY AND INFORMATION SECURITY.....	5
PRIVACY AND DATA PROTECTION .....	5
FACILITATION OF TAX EVASION.....	5
ANTI-BRIBERY AND CORRUPTION .....	5
PHYSICAL SECURITY .....	6
BUSINESS CONTINUITY .....	6
INSURANCE .....	6
SUB-CONTRACTING.....	6
INCLUSIVE PROCUREMENT.....	6
<b>Monitoring and governance.....</b>	<b>7</b>
<b>Breaches or concerns .....</b>	<b>7</b>

## Introduction

---

DLA Piper's business in Europe, Africa, the Middle East and Asia Pacific (DLA Piper) is committed to the highest standards of social and environmental responsibility. We expect our suppliers and business partners to share our aim to promote lawful, professional, fair practices that integrate respect for human rights, business ethics and sustainability, and to support and contribute to DLA Piper's achievement of its environmental and social commitments.

We recognise both the opportunity and responsibility we have, in partnership with our suppliers, to lead on delivering a sustainable future. Therefore, environmental, social and economic considerations are integral to our decision-making when selecting our suppliers to deliver goods and services. We believe sustainable procurement will help us to achieve sustainable growth by managing risk, maximizing efficiency and driving value.

The DLA Piper Supplier Code of Conduct (Code) exists to promote and ensure safe and fair working conditions and the responsible management of environmental and social issues in the DLA Piper supply chain.

DLA Piper requires agreement to the Code from all those involved in its supply chain. The Code describes DLA Piper's expectations of how all our suppliers and business partners conduct their business and applies to all suppliers and business partners providing products or services to DLA Piper. All suppliers and business partners are expected to act in accordance with the Code, including aligning policies, practices and guidelines and communicating and enforcing the Code throughout their organisation and across their supply chain.

## Requirements and expectations

---

### DLA PIPER VALUES

We're committed to adhering to the following core values in all our dealings with our clients, our people and our communities:

- be supportive;
- be collaborative;
- be bold;
- be exceptional.

We expect all our suppliers to support these values through the products and services they provide to DLA Piper.

### COMPLIANCE WITH LAWS

DLA Piper expects its suppliers to operate in accordance with all applicable laws and regulations. This includes those respecting individuals' human rights, prohibiting bribery and corruption and stipulating mindfulness of environmental and safety impacts of products and services. When differences arise between standards set out in the Code and legal or regulatory requirements, the stricter standard applies, in compliance with applicable law or regulation.

## HUMAN RIGHTS

DLA Piper recognises its responsibility to protect human rights. We expect our business partners and suppliers to respect human rights and to have in place policies and processes to meet their responsibility to protect and respect human rights that apply to all workers, suppliers, and their supply chains and to comply with all relevant legislation, regulations and directives in countries where they operate. At a minimum, suppliers should be able to demonstrate that compliance with the UN Guiding Principles on Business and Human Rights (see below) is encouraged and observed within their business.

Suppliers sourcing goods or services in geographies with high risk of human rights violations must notify DLA Piper immediately and provide information on the steps the supplier has taken to ensure risk of violation of human rights in relation to this purchasing activity are being fully mitigated. Countries with high risk of human rights violations can be identified via public sources, including the Human Freedom Index and similar. DLA Piper reserves the right to conduct further due diligence until it is satisfied that no adverse effects have or are likely to take place.

For more information see the [UN Declaration of Human Rights \(OHCHR | Universal Declaration of Human Rights\)](#) and the [UN Guiding Principles on Business and Human Rights](#).

### GRIEVANCE MECHANISM

We expect our suppliers to have a process through which workers can raise workplace concerns without fear of retaliation. This grievance mechanism should be transparent and understandable to workers and should ensure the protection of whistleblowers.

DLA Piper's own whistleblowing portal can be accessed here: [DLAPiperPulse – Safecall](#).

### FORCED LABOUR

Suppliers and business partners will not use or permit their subcontractors to use child, slave, forced or obligatory labour, including prison labour, indentured labour, bonded labour or other forms of forced labour.

These practices, identified by the International Labour Organization (ILO), include withholding of wages, retention of identity documents, and restriction of movement. For full guidance from the ILO please see: [The 8 ILO Fundamental Conventions](#).

Vendors must put into place measures that ensure workers are not exploited by third-party labour providers, such as recruiters or agencies. Such measures include: caps on or elimination of recruitment fees; provision of contracts to all workers in their native language or other language they can understand; elimination of deposits paid by workers to vendors or recruiters to secure jobs.



Additionally, suppliers must not engage in or support human trafficking and are encouraged to implement due diligence measures to ensure that no human trafficking exists in their extended supply chains. Suppliers must also fully comply with requirements of applicable slavery, forced labour and human trafficking laws without limitation.

### **CHILD LABOUR**

Suppliers and business partners will ensure that no person under the age of 15 or under the age for completion of compulsory education, whichever is higher, is employed. The necessary preventive measures to ensure this include age-verification systems, training for managers, and communicating with sub-contractors and suppliers on child labour issues. Suppliers must also comply with local laws regarding the minimum age of employees and all other applicable child labour laws.

### **COMPENSATION**

Suppliers and business partners must pay workers regularly and on time at least the minimum wage or the appropriate prevailing wage, whichever is higher and comply with all legal requirements on wages. DLA Piper in the UK is a signatory of the Living Wage Foundation, and we encourage all our suppliers to pay their workers a living wage – a wage that enables employees and their families to afford a decent standard of living where they live.

All other types of legally mandated benefits must be provided as required by law, including, as applicable, paid leave, pension, statutory insurance, health benefits, maternity leave, parental leave, family care leave, and childcare benefits. All overtime work must be performed and compensated in accordance with the law and the individual's employment contract or other applicable contract or collective agreement.

### **WORKING HOURS**

Our suppliers must ensure that workers are not required to work more than the relevant legal limits on working hours, overtime hours and number of working days per week. All overtime work must be consensual. Workers must be granted and correctly compensated for any types of paid leave or time off to which they are legally entitled under applicable law, which may include holidays, maternity/parental leave, family care leave and sick leave. While it is understood that overtime may be required, suppliers must carry out operations in ways that limit overtime to a level that ensures humane and productive working conditions.

### **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Suppliers and business partners must recognise and respect the right of employees to freedom of association and collective bargaining without interference, discrimination, retaliation or harassment and must meet or exceed relevant requirements of local law.

## **HEALTH AND SAFETY**

DLA Piper is committed to providing our people with a safe and secure working environment that safeguards their health, and promotes physical and mental wellbeing, regardless of where in the world they work. Our suppliers are expected to support our commitments by complying with all applicable health and safety laws and regulations in the jurisdictions in which they operate, having the appropriate arrangements in place for managing health and safety, and providing their goods and services safely, without risks to health.

As a minimum, we expect our suppliers and business partners to:

- jointly assess or notify DLA Piper of health and safety risks associated with the performance of their contract;
- comply with our health and safety requirements while on our premises, including, but not limited to agreed method statements and permit to work arrangements;
- report all incidents and near misses related to the contract;
- provide health and safety policy statement, management arrangements, certifications and insurances on request.

## **ENVIRONMENT**

DLA Piper is committed to minimising the environmental footprint of its business operations while contributing globally to the evolving societal goals for sustainable development.

We expect our key suppliers to:

- demonstrate a good understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide;
- promote environmentally sustainable practices within their own supply chain, including responsible sourcing;
- set their own science-based targets for reducing carbon emissions and develop a decarbonisation pathway to net zero;
- comply with relevant recognised eco-friendly standards and certifications such as ISO 14001, Green Seal, Energy Star, etc.;
- prioritise energy efficiency in their operations, utilising technologies and processes that minimise energy consumption;
- use renewable sources of energy wherever possible;
- adopt circular economy principles, with particular emphasis on lifecycle considerations and take-back programmes;
- implement waste reduction measures and promote recycling initiatives;
- ensure that their operations do not adversely impact biodiversity and local ecosystems;
- measure and report their environmental performance throughout the contract.

For the purposes of this Code of Conduct, DLA Piper defines key suppliers as those with whom DLA Piper has a multi-year relationship, those in the top 70% of our spend, and those suppliers who have a material impact on DLA Piper's ability to meet our own targets.

### **ETHICAL BUSINESS PRACTICE**

Integrity is vital for a sustainable relationship with suppliers and DLA Piper does not tolerate corruption or bribery in any form. We expect all suppliers to uphold the highest standards in ethical business practice and comply with requirements of all applicable anti-corruption laws. Our zero-tolerance approach requires all suppliers and business partners to have in place policies, systems and/or procedures to ensure zero tolerance towards, but not limited to, human rights abuses, money laundering, fraud, bribery, tax evasion, conflicts of interest, corruption and other improper payments, benefits gifts or other inducements.

Suppliers should take appropriate steps to ensure that all who act for or on their behalf also comply with such obligations.

Any ethical breaches or suspicions of breaches should be reported (anonymously if desired) to DLA Piper's whistleblowing portal: [DLA Piper Pulse – Safecall](#).

### **CONFIDENTIALITY AND INFORMATION SECURITY**

Our suppliers and business partners must have robust cybersecurity processes and controls in place to protect data and confidential information. Suppliers must adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of DLA Piper. In addition, suppliers must comply with all applicable privacy/data protection and information security laws and regulations.

### **PRIVACY AND DATA PROTECTION**

We expect our suppliers to protect personal information they process on our behalf. Suppliers must adopt and maintain processes to ensure compliance with applicable data protection and privacy laws and provide reasonable protections for personal information, including information that they access, receive or process on behalf of DLA Piper. Suppliers should recognise that unauthorised use and/or disclosure of such information may have severe, legal, reputational and financial consequences for the vendor, the individuals whose personal information may be implicated, and for DLA Piper.

### **FACILITATION OF TAX EVASION**

Our suppliers and business partners shall not engage in any activity, practice or conduct which would constitute or facilitate tax evasion (including but not exclusively the UK offences under sections 45(1) and 46(1) of the UK Criminal Finances Act 2017 (Act)).

Our suppliers and business partners must have and maintain in place such policies and procedures as are both reasonable to prevent the facilitation of tax evasion by another person (including without limitation all employees) and to ensure compliance with this clause.

Suppliers and business partners will ensure the same of any affiliates, retained agents, subcontractors, intermediaries or workers performing services or providing goods to DLA Piper.

DLA Piper reserves the right to request suppliers' policies on tax evasion.

### **ANTI-BRIBERY AND CORRUPTION**

DLA Piper is committed to conducting our business in accordance with the highest ethical standards and in compliance with all applicable laws and regulations. We expect our suppliers to share our principles and uphold our standards, and to comply fully with the agreed ABC policy and procedures to ensure that all those involved in the supply chain understand and adhere to these standards.

DLA Piper does not tolerate corruption or bribery in any form, and we expect our suppliers to fully comply with the requirements of all applicable anti-bribery and corruption laws, including but not limited to the US Foreign Corrupt Practices Act and the UK Bribery Act. Suppliers will not directly or indirectly accept, promise, solicit, receive, offer or give a bribe. A bribe includes a financial or other advantage, intended to induce a person to give improper assistance in breach of their duty, or to otherwise improperly influence someone with the underlying purpose of obtaining or retaining business, or an advantage in the course of business either for DLA Piper or a third party. Examples of bribes includes any benefit, fee, facilitation payment, kickback, donations (political or charitable), commission, dividend, gift, hospitality, cash, gratuity, services, consideration or any inducements of any kind to any DLA Piper partners, employees, interns, consultants and third parties (which includes suppliers). Suppliers must also not be involved in corruption, which is the misuse of entrusted power or a breach of duty for personal gain.

Furthermore, suppliers must ensure the same of any affiliates, agents, subcontractors, intermediaries or those who work for them.

The prohibition on giving or receiving bribes, extends not only to public officials, officers and candidates for political office, and workers of state-owned enterprises, but also to workers or officers of counterparties, clients/customers, suppliers, any agent of the aforementioned parties, or any other person with whom the firm does or anticipates doing business. DLA Piper reserves the right to request a supplier's policy or similar document on anti-bribery and corruption.

## PHYSICAL SECURITY

Our suppliers and business partners must comply with our security requirements when conducting business for DLA Piper and commit to the protection of our people, property, assets and reputation. They should visibly wear identification while on our premises; be escorted as far as reasonably practicable while on our premises; not enter working floors without authorisation; not take any photographs or record video without prior written approval; comply with all applicable legislation and relevant regulatory requirements; take responsibility for their personal items; comply with any ad hoc requirements that may be implemented depending on their scope of work.

## BUSINESS CONTINUITY

Where suppliers are providing services that impact DLA Piper's ability to meet our own targets and obligations (our key suppliers), we expect them to be operationally resilient. Suppliers should take appropriate steps to ensure their critical processes are defined, with recovery procedures in place to address risks. Business response procedures and appropriate workarounds/fall back procedures should be in place and regularly tested to ensure continuity of service in the event of any disruptions. For our most critical suppliers, we may request details of our suppliers' business continuity arrangements, which may involve testing by DLA Piper.

## INSURANCE

Our suppliers and business partners must have adequate and relevant insurance including, but not limited to, public and product liability and professional indemnity insurance which is current for the duration of the contract. They must comply with any request to provide proof of insurance or other related information and keep the firm abreast of any material changes.

## SUB-CONTRACTING

Our suppliers and business partners must seek the firm's written consent before any sub-contracting.

## INCLUSIVE PROCUREMENT

At DLA Piper, inclusion is at the heart of everything we do. We acknowledge that being diverse and inclusive is not about identifying and putting people into categories. It should inspire a feeling of being welcomed, heard and respected among our people and vendors. We want everyone both inside and outside our firm to feel that their voice, made up of their individual experiences and characteristics – but not defined by them, is heard and valued.

To achieve a truly diverse and inclusive workplace, as well as setting goals, monitoring data and intervening if required, we are focused on the culture of our firm. Our values reflect this. We are supportive. This means we are thoughtful, and we embrace diversity. We must be bold and collaborative in our ambition to address barriers and level the playing field, and move towards an 'everyone' culture, where all our people feel they belong. We must be willing to be different and set ourselves apart. This will help make us exceptional.

We want our people to be able to work in an environment where they feel respected and valued regardless of the jurisdiction they work in or the role they perform. And this extends to all our suppliers, contractors and vendors. All suppliers, contractors and vendors are expected to hold these high standards in all their dealings with DLA Piper.

We believe that how we allocate our resources, matters and that inclusive procurement from a broad range of businesses can bring about meaningful, long-term, sustainable change.

We expect our vendors to share the same commitment to being diverse and inclusive, both in their operations and supply chains.

In return, our vendors will be treated fairly and equally during the tendering and purchasing process, with decisions made based on clear selection criteria.

Vendors should take all steps required to be inclusive in their operations, which include but are not limited to:

- treating workers with dignity and respect at all times;
- ensuring that all laws and any applicable discrimination legislation are complied with regarding the fair treatment of people;
- providing a fair and transparent recruitment and hiring processes;
- providing a workplace free from discrimination, bullying, harassment or inappropriate behaviour;
- ensuring that no person experiences disadvantage based on (but not limited to) the following:
  - age, disability, ethnicity, faith, gender, gender identity, marital status, parental status or pregnancy, sexual orientation, social origin or any other underrepresented group;
- having a stated commitment to being diverse and inclusive and being able to demonstrate active compliance if requested.

DLA Piper expects vendors to promote diversity in their own supply chain and purchase goods and services from a broad range of businesses. Vendors are also expected to apply the following principles to their own supply chains:

- apply inclusive procurement policies – for example through offering tendering opportunities and awarding contracts to new, small, innovative suppliers, or using women-owned, LGBTI+ owned or other underrepresented group owned, or locally owned business to supply services or products;
- support a range of suppliers, from SMEs to social enterprises, giving them the opportunity to compete for business on a fair and equal scale;
- consider usability by and inclusion of individuals with disabilities when designing products and/or delivering services to DLA Piper;
- comply with all relevant regulatory requirements, and with any local diversity regulations and programs.

## Monitoring and governance

---

DLA Piper is committed to ensuring compliance with this Supplier Code of Conduct. We expect all new and existing suppliers to meet these expectations by establishing effective management systems to address the topics set out within the code and to continuously review and improve their performance. This should include a process for the identification and proactive mitigation of risks associated with compliance to this Code, as well as a process for ongoing monitoring and review of risk controls, and prompt and accurate reporting of all incidents.

We expect suppliers to cooperate with reasonable assessments requested by DLA Piper. DLA Piper may request suppliers to complete a Supplier Questionnaire to both assess the supplier's compliance with this Code and collect information on the supplier's approach to corporate responsibility and sustainability. We may request completion of the Supplier Questionnaire at the start of the business relationship, and/or periodically thereafter.

The information gathered through the Supplier Questionnaire is used to perform an internal desk review of any risks or opportunities specific to the individual supplier. DLA Piper may request additional information and evidence from the supplier if deemed necessary.

DLA Piper may also offer support and capacity building, as may be appropriate, to support suppliers in their sustainability journeys.

## Breaches or concerns

---

If suppliers, or one of their employees or contractors, believe that the terms of this Code are not being complied with by either the supplier or DLA Piper, we encourage them to report their suspicions or concerns to DLA Piper's General Counsel, or via our publicly accessible whistleblowing mechanism ([DLA Piper Pulse – Safecall](#)).

Material risks identified through supplier assessment or non-compliance with this Code will be addressed through the actions detailed below:

- We expect suppliers to develop a remediation plan for any instances, non-compliance and/or significant risk, and provide progress updates to DLA Piper on at least an annual basis, or more frequently depending on the severity of the issue.
- The remediation plan should include:
  - **Problem statement:** The issue the supplier is not able to comply with and the reasons for not complying.
  - **Corrective actions:** Specification of the actions that will be taken in order to comply or correct.
  - **Timeline:** Definition of a period of time to fulfil the corrective actions.
  - **Preventive measures:** Detail of any additional measures or changes that will be implemented to prevent similar issues from occurring in the future.
  - **Communication:** Specification of how the progress and results of the Remediation Plan will be communicated to DLA Piper and relevant stakeholders.
- DLA Piper only partners with suppliers that attest they respect and comply with this Code and all applicable health, safety, environmental, employment, fiscal and other laws, rules and regulations. Failure to comply or inability to provide the appropriate evidence may disqualify them from the procurement process and/or result in termination of existing contracts.

DLA Piper is committed to continuously reviewing and updating this Code. Therefore, this Code is subject to modification from time to time.

The contents of this Code are additional to and do not in any way affect or prejudice any of DLA Piper's rights and remedies under the relevant contracts with each supplier, if any. The failure or omission to comply with the requirements of this Code of Conduct may constitute a breach of contract. In the event of any conflict or ambiguity between any provision of this Code and the provisions of any relevant contract with any supplier, the provisions of that contract will prevail.

