



# DWF Supplier Code Of Conduct

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# Introduction

## It Starts With Our Purpose...

**At DWF, we are driven by a common purpose to deliver positive outcomes with our colleagues, clients and communities. As a global legal business, we must act responsibly, how we do business is just as important as what we do.**

Leading with purpose means living up to our values, ensuring we are able to demonstrate the extent to which those values inform business decisions in a way that is consistent with the expectations of our stakeholders. This includes the way we source goods and services from our suppliers.

This code sets out what we expect in terms of responsible business behaviour and demonstrates an attitude that is alert and responsive to the challenges of doing business in a global context.

Since 2016, we have been a signatory to the Ten Principles of the UN Global Compact on human rights, labour, environment and anti-corruption. They provide a blueprint for how a responsible, sustainable business operates and contribute to the delivery of the UN Sustainable Development Goals – a set of global goals to end poverty, inequality and protect the planet.

Our ESG strategy includes ambitious science-based targets, with an explicit commitment to substantially reducing carbon emissions across our value chain – the ESG credentials of a supplier are a specific factor included in business award decisions made by DWF. Consistent with our commitment to responsible business, we support the Universal Declaration of Human Rights and ILO (international Labour Organisation) labour standards.

- | We believe in developing mutually beneficial relationships with our suppliers, founded on trust and respect.
- | We conduct business with integrity, complying with all applicable laws, rules and regulations of the countries in which we operate.
- | We maintain our zero-tolerance approach to bribery or any form of unethical inducement or payment to gain any advantage for DWF.

## Guiding Principles

- | We promote a diverse and inclusive workplace and will not tolerate discrimination, bullying, harassment or victimisation in our workplace or in connection with any service provision.
- | We adopt a zero tolerance to slavery, forced labour and human trafficking.
- | Identify and avoid any actual or apparent conflict of interest.  
Maintain a zero-tolerance approach to child labour.
- | We believe in being good corporate citizens and shared responsibility to contribute to community prosperity and resilience.
- | We contribute to the global effort to reduce, reuse and recycle wherever possible.

## What we need you to do

- | Support our guiding principles.
- | Confirm your agreement to comply with this Code of Conduct (and any future revisions) as part of the due diligence suite when requested.
- | Share this Code of Conduct with your employees so they understand what is important to us.

## Living Our Values

This Code describes how we put our values into practice. It helps us to do the right thing, to ask the right questions and make the right decisions every day. However, no Code can describe every situation we might face, cover every applicable law or action we take.

Our culture depends on all of us living our shared values every day, so our colleagues, clients, suppliers and communities can remain confident that their trust in us is not misplaced.

Our values define who we are and what we stand for. They are what we believe and influence the behaviours people see and experience. That's why it is so important that we apply these values to everything that we do.

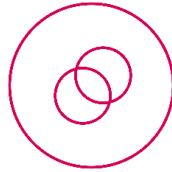
# Our Values

Our values are at the heart of our inclusive culture, providing a clear foundation for our people, and are integral to the achievement of our strategy. They influence actions and behaviours, complement our strategic direction and support the integration of people that join our business.



## Always Aim Higher

We exceed the expectations of our colleagues and our clients in everything we do.



## Be Better Together

We listen, recognise and support each other to protect a diverse and inclusive culture and sustain our business, clients and communities.



## Keep All Promises

We listen, recognise and support each other to protect a diverse and inclusive culture and sustain our business, clients and communities.



## Disrupt to Progress

We embrace change and new ways of working to enhance our performance and our reputation.



## Attend to Details

We achieve the best results to complex problems by focusing on simple and effective solutions.

Our core purpose is to deliver positive outcomes for our colleagues, clients and communities. We deliver this through our ESG strategy which focuses on six key areas of work:



Diversity &  
Inclusion



Climate Action



Empowering  
Colleagues &  
Our  
Communities



Supporting &  
Connecting  
with our  
Clients



Acting with  
Integrity in  
Everything  
we do



Building  
Trust and  
Increasing  
Transparency

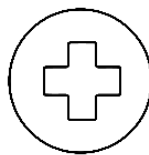
# Responsible Business Practice

Our suppliers should comply with all applicable laws and regulations which apply to their business and to that of their wider group.

We have broken down our expectations of suppliers are grouped into 7 key areas:



Human Rights



Health & Safety



Responsible Supply Chain Management



Diversity & Inclusion



Business Integrity



Climate Action & Environmental Management



Confidentiality, Privacy & Intellectual Property

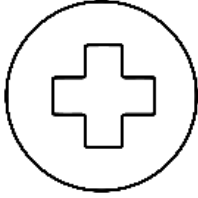


# Human Rights

We are committed to recognising and preventing human rights breaches including modern slavery, human trafficking and child labour in all its forms. As a responsible business and employer, upholding human rights is fundamental to who we are and what we stand for.

## What we expect from you:

- | Respect the human rights of your employees.
- | Comply with all relevant legislation, regulations and directives in the countries and communities in which you operate.
- | Ensure that all employees can make a free choice about their employment: there should be no illegal, forced, bonded, involuntary or exploited labour.
- | Ensure there is no involvement in incidences of human trafficking or involuntary movement of people for exploitation.
- | Ensure that no underage workers are employed, either directly or indirectly
- | Pay wages which at least meet minimum national standards, overtime is voluntary, used reasonably and compensated fairly.
- | Respect the rights of your employees to associate freely, join or not join labour unions, seek representation and join workers' councils.
- | Provide a workplace free of harsh and inhumane treatment, mental or physical coercion or verbal abuse.
- | Suppliers shall support the elimination of child labour.



# Health & Safety

Suppliers should ensure that workers are provided with adequate training relating to health and safety, along with appropriate personal protective equipment to protect against hazards typically encountered in that supplier's business and any other locations in which their workers operate.

## What we expect from you:

- | Provide & promote a safe working environment abiding by local laws and regulations, respecting the health & wellbeing of your employees and any subcontractors.
- | Have a Health & Safety Policy in Place unless local legislation dictates otherwise.
- | Identify and assess emergency situations in the workplace and minimise their impact through prevention and by implementing emergency plans and response procedures.
- | Suppliers must provide workers with safe and hygienic working conditions. This includes as a minimum potable drinking water, adequate lighting, temperature, ventilation and sanitation.
- | Suppliers should ensure that appropriate steps are taken to prevent accidents and injury to health through appropriate controls, safe work procedures, preventative maintenance and necessary technical protective measures. Where hazards cannot be adequately controlled by these means, suppliers will provide workers with appropriate, well maintained personal protective equipment.
- | Suppliers' workers shall receive regular, recorded health and safety training.



# Responsible Supply Chain Management

It is important to us to engage with our supply chain, to understand more about your priorities, mitigate risks and to collaborate and support you.

## What we expect from you:

- | Deal fairly with subcontractors in your supply chain, avoiding the flow of unreasonable levels of risk to subcontractors who cannot be expected to manage or carry these risks.
- | Manage your suppliers appropriately to mitigate supply chain risks. This may include the development and implementation of appropriate business continuity plans for operations.
- | Supporting the supply of goods and services to DWF.
- | Not create barriers to the use of small businesses and social enterprises qualified to provide goods or services.
- | Have reasonable payment policies in place aligned to the Prompt Payment Code
- | Encourage innovation in your supply chain to increase the value or quality of supply and to take positive actions to improve social, ethical and environmental standards where relevant.



# Diversity & Inclusion

Our vision is to create a working environment and culture where colleagues of all different backgrounds can contribute at their highest level to deliver positive outcomes for our colleagues, clients and communities.

This means sustaining a workplace where everyone is included, valued and equipped with skills for today and the future.

## What we expect from you:

- | Provide a workplace free of bullying, harassment and discrimination.
- | Prohibit direct and/or indirect discrimination based on age, gender, ethnicity, race, nationality, paternity and/or maternity, marital/civil partnership status, pregnancy, sexual orientation, gender transition or reassignment, gender identity/expression, disability, national, cultural, religious or personal beliefs, part time or full-time status, or flexible and agile working.
- | Make available to workers a mechanism to express grievances without fear of reprisal, ensuring concerns are dealt with appropriately and in a timely manner.
- | Support the development of an inclusive and diverse workforce through all aspects of your operations and management.
- | Offer equality of opportunity in employment, skill development and career progression, particularly with under-represented segments of society around local operations.
- | Promoting positive mental health, well-being in the workplace, and a healthy work-life balance



# Business Integrity

Maintaining the confidence and trust of our stakeholders is essential to our continued success and we work hard to hold ourselves to the highest standards of integrity and governance.

## What we expect from you:

- | Conduct business with integrity and a high regard for social responsibility.
- | Abide with the requirements of local, national and international laws and regulations regarding ethical and social conditions (as covered in this Code)
- | Prohibit bribery or other means of obtaining an unfair advantage and adhere to anti-corruption laws.
- | Have procedures in place to cover improper payments, conflicts of interest, extortion and fraud, gifts and hospitality.
- | Communicate any potential conflicts of interest immediately to DWF. You may also be asked as part of any initial dialogue to declare any such known or potential connections to DWF which may be deemed a conflict of interest.
- | Have in place reasonable prevention procedures to prevent persons associated with you from engaging in criminal facilitation of tax evasion.
- | Use social media in a responsible, reasonable, and respectful manner and ensure any comments you make align with the ethical values of DWF.



# Climate Action & Environmental Management

We have set an aggressive science-based target to reduce our Scope 1, Scope 2 and Scope 3 carbon emissions by 50% in line with a 1.5C pathway and have an Environmental Management System accredited in the UK to the ISO14001 Standard to identify and control the impacts of our business.

## What we expect from you:

- | Comply with all applicable environmental regulations
- | Conserve natural resources and engage in activities aimed at reducing water usage and energy consumption
- | Work to reduce your direct and indirect carbon emissions in line with the global transition to a low carbon economy
- | Constructively engage with DWF to explore collaborative opportunities to reduce carbon output and enhance resilience to climate change
- | Contribute to the global effort to reduce, reuse and recycle wherever possible
- | Operate in a responsible manner to ensure the safe handling, movement, storage, recycling, reuse or management of waste and prevention of spills/releases into the environment
- | Assist DWF in understanding your impact on the environment and plans to reduce these impacts. Consider the benefits of being certified to a formal Environmental Management System Standard such as ISO14001
- | Apply innovative approaches to managing the supply chain in order to cut carbon emissions
- | Explore commitment and adoption of science based targets (Ambitious corporate climate action – Science Based Targets)



# Confidentiality, Privacy & Intellectual Property

DWF is committed to treating other parties' confidential, private or intellectual property with integrity. We respect the confidentiality of the information provided to us and expect our suppliers to meet similar standards.

## What we expect from you:

- | Safeguard the integrity and security of your systems and inform us immediately if you become aware of any cyber security incident that affects or has the potential to affect DWF information and/or personal data, please contact [Information.Security@dwf.law](mailto:Information.Security@dwf.law). The notification should include all relevant details of the breach, its impact, and any remedial actions taken or proposed.
- | To comply in full with all applicable data legislation within all operational jurisdictions.
- | Ensure that all information received from us (or on our behalf) is held confidentially and securely and in compliance with all contractual provisions and any applicable laws in relation to confidential information.
- | Only collect the personal information required to fulfil the service you are providing and to not further process this information in a manner incompatible with this service.
- | Sufficiently protect intellectual property rights of DWF and its clients and comply with any agreements they have with us about the use of our intellectual property.
- | Uphold rigorous standards of fairness, transparency, and accountability when deploying Artificial Intelligence (AI). AI systems should be developed and utilised in a way that protects individual rights and freedoms, including privacy and data protection. Additionally, any decisions made by AI should be explainable and subject to human supervision.

# Compliance with this Code

We expect all our suppliers to meet or exceed the provisions of this Code. Our goal is to build trust and open relationships with our supply chain and work with you to develop our approach to responsible sourcing and sustainable procurement.

DWF reserves the right to conduct audits on our suppliers to ensure compliance with our Supplier Code of Conduct. This includes, but is not limited to, the right to verify adherence to human rights standards, Data Security and service delivery as outlined in our policies and agreements.

- | You are duly authorised to complete and submit this form on behalf of the named company/organisation.
- | The named company/organisation complies in full with all relevant and applicable laws and will continue to do so on an ongoing basis.
- | You will notify DWF immediately should any change occur which affects any self-assessment response answer or statement. If there are situations where you fall short of this Code, you must let us know. We will work with you on the development of an improvement plan.
- | You acknowledge that DWF reserve the right to seek further clarification and/or detail in respect of any response provided and on occasion require evidence (e.g. policies etc.) to fulfil our internal audit requirements of our suppliers.
- | Understand that deliberately, recklessly or negligently making a false, inaccurate or misleading statement could result in a range of consequences being applied, including but not necessarily limited to, immediate termination of any and all contracts or other agreements between DWF and the named company/organisation at DWF's sole and absolute discretion.
- | The expectations in this Code are in addition to and not in lieu of any legal agreement or contract.
- | Declaration to this code can be found on the Onboarding Self Declaration questionnaire, any questions about this please contact [Procurement@dwf.law](mailto:Procurement@dwf.law)



# DWF is a leading global provider of integrated legal and business services.

Our Integrated Legal Management approach delivers greater efficiency, price certainty and transparency for our clients. All of this, without compromising on quality or service. We deliver integrated legal and business services on a global scale through our three offerings; Legal Services, Legal Operations and Business Services, across our eight key sectors. We seamlessly combine any number of our services to deliver bespoke solutions for our diverse client base.

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