

Supplier code of conduct policy

The Simmons & Simmons supplier code of conduct (“Code”) defines the standards we expect of our suppliers, which reflects the standards we adhere to as a firm.

We expect these standards to be implemented throughout our suppliers’ businesses and within their own supply chains.

As an firm, Simmons & Simmons is committed to ensuring that we minimise harmful impacts and work actively with our partners to deliver increased positive benefits for the environment and society. All suppliers to Simmons & Simmons must commit to adhering to this Code, which sets the minimum expected standards.

Simmons & Simmons pledges to help our suppliers understand how to improve their sustainability practices and positive impacts. We recognise that this effort requires listening to our suppliers and taking a collaborative approach to solving challenges.

As a firm we are committed to the [UN Sustainable Development Goals](#), the [International Bill of Human Rights](#), the [UN Guiding Principles on Business and Human Rights](#) and the principles set out in the [International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work](#). These commitments guide both our internal approach and our expectations of our suppliers. While we recognise that there are different legal and cultural environments in which suppliers operate, this Code outlines the basic requirements to which suppliers should adhere in order to do business with Simmons & Simmons.

Suppliers must be able to demonstrate adherence to the Code at the request of Simmons & Simmons, which reserves the right to audit suppliers based on the principles of this Code. This Code is supported by the statements made and evidence provided during the supplier due diligence and onboarding process. The areas covered in the supplier code of conduct includes:

- (1) labour practices and conditions
- (2) sustainability and environmental issues
- (3) ethics and anti-corruption
- (4) data security and privacy
- (5) diversity and inclusion
- (6) sanctions and export controls

Supplier code of conduct

1. **Part 1 – Labour Practices and Conditions**

These standards set out our expectations for fair, safe and healthy working conditions and responsibility for those conditions throughout our supply chain. The standards are based on best practices created by the Fair Labor Association (FLA) and the International Labor Organisation (ILA).

Requirements in this Code apply to the whole supply chain, including sub-suppliers, subcontractors and farms. Standards equally apply to permanent, temporary, and agency workers, as well as piece-rate, salaried, hourly paid, legal young workers (minors), part time, night, and migrant workers.

Simmons & Simmons seeks at all times to exercise the best possible practices for the respectful and ethical treatment of workers and promote sustainable conditions in which workers earn fair wages in safe and healthy workplaces. We expect the same standards to apply to those who work in our supply chain.

1.1 **Law and code compliance**

Our suppliers are expected to comply with

- (A) all relevant and applicable laws and regulations of the country in which workers are employed including those at the federal, state/provincial and local community levels,
- (B) where applicable, collective bargaining agreements, and
- (C) the expectations set out in this supplier code.

1.2 **Child labour**

No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher. Juvenile workers (ages 15-17) shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to compromise their health, safety or morals. ([ILO Convention 138 and 182](#))

1.3 **Forced labour and anti-slavery**

There shall be no use of forced labour, including prison, indentured, bonded, slave or other forms of forced labour. Acts of human trafficking are also prohibited. Simmons & Simmons expects its suppliers to comply with all applicable anti-slavery and human trafficking laws and regulations, including but not limited to the Modern Slavery Act 2015 (United Kingdom). Suppliers are required to have appropriate monitoring of any third party entity which assists them in recruiting or hiring employees, to ensure that people seeking employment at their facility are not compelled to work through force, deception, intimidation, coercion or as a punishment for holding or expressing political views. (ILO Conventions [29, 105, 182](#)).

1.4 **Harassment, abuse and disciplinary practices**

Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse, or to monetary fines or embarrassing acts as a disciplinary measure.

1.5 **Discrimination**

No person shall be subject to any discrimination in any aspect of the employment relationship including recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, discipline, termination or retirement, on the basis of race, religious belief, colour, gender, pregnancy, childbirth or related medical conditions, age, national origin, ancestry, sexual orientation, gender identification, physical or mental disability, neurodiversity, medical condition, illness, genetic characteristics, family care, marital status, status as a veteran or qualified disabled veteran (in the USA only), caste, socio-economic situation, political opinion, union affiliation, ethnic group, illness any other classification protected under applicable law. All employment decisions must be made based on the principle of equal employment opportunity, and shall include effective mechanisms to protect migrant, temporary or seasonal workers against any form of discrimination. (ILO Conventions [100](#) and [111](#))

1.6 **Freedom of association and collective bargaining**

Suppliers must ensure that workers are free to join organisations of their own choice. Suppliers shall recognise and respect the right of employees to freedom of association and collective bargaining. All suppliers must develop, appropriate to the size of the company, effective grievance mechanisms which resolve internal industrial disputes and employee complaints, and ensure effective, respectful and transparent communication between employees, their representatives and management. (ILO Conventions [87](#), [98](#) and [135](#))

1.7 **Employment relationship**

Suppliers should adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labour and social security laws and regulations.

1.8 **Wages and benefits**

Suppliers should ensure that worker compensation is sufficient to meet the workers' and their family's basic needs and provide some discretionary income. Employers shall pay wages which equal or exceed minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law and/or contract. (ILO Conventions [26](#) and [131](#)).

1.9 **Overtime wages**

In addition to compensation for regular working hours, employees must be compensated for overtime hours at the rate legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate exceeding the regular hourly compensation rate by at least 125%. (ILO Convention [1](#) and [30](#))

1.10 **Hours of work**

Suppliers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular workweek shall not exceed 48 hours or the maximum allowed by the law in that country, whichever is less. Employers shall allow workers at least 24 consecutive hours of rest in every seven-

day period. All overtime work shall be consensual. Employers shall not request overtime hours on a regular basis. The sum of regular and overtime hours in a week shall not exceed 60 hours or the maximum allowed by the law in that country, whichever is less. (ILO Convention [1](#))

1.11 **Health and safety**

Suppliers shall provide a safe and healthy workplace to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities. The employer shall take a proactive approach to health and safety by implementing policies, systems and training designed to prevent accidents, injuries and protect worker health, and which are appropriate to the size of the business. (ILO Convention [155](#))

2. **Part 2 : Sustainability and environmental Issues**

As a firm, we are committed to minimising negative impacts on the environment. We expect our suppliers to comply with all applicable environmental laws, regulations and standards. Suppliers should also responsibly manage their energy and natural resource usage, emissions, discharges, carbon footprint and disposal of waste.

We expect our suppliers to have in place the following:

2.1 **Carbon reduction**

An appropriate carbon reduction and environmental management system or approach. This should be commensurate to the size of the company, sector and environmental impacts, including certification where relevant.

2.2 **Energy consumption**

Energy consumption and efficiency plans, including an agreed and publicly available greenhouse gas emissions reduction plan in line with the [Paris Accord](#). Greenhouse gas emissions should be recorded and suppliers commit to providing Simmons & Simmons data when requested.

2.3 **Hazardous materials**

Hazardous materials management plan to ensure that all hazardous materials including waste are handled to ensure safe use, movement, storage and disposal.

2.4 **Waste management**

(A) Waste management strategy or practices which seek to minimise waste, and increase the circular economy, including through recycling and efficiency programmes.

(B) We accept and understand that the maturity, size and complexity of such systems will differ, especially within the SME sector, and for those businesses currently developing their sustainability strategies.

3. **Part 3: Ethics and anti-Corruption**

As a firm, we are committed to upholding the highest level of ethical standards of business and anti-corruption practices. We expect our suppliers to apply the same level of diligence and standards. We expect all suppliers to apply stringent ethical and moral business standards in line with those set out in the relevant jurisdictional legal frameworks in which they operate, including the Bribery Act 2010 (United Kingdom). We expect all of our suppliers to have in place:

- (A) Appropriate management systems in place to oversee ethical standards and business standards.
- (B) Systems and practices to ensure that the highest standards of integrity in relation to anti bribery and corruption are adhered to. Suppliers are expected to have a zero tolerance approach in relation to all forms of bribery and corruption, or similar unethical practices, including improper payments or gifts.
- (C) Systems to prevent conflicts of interests arising, and to ensure that potential conflicts of interest are managed effectively. Suppliers should not engage in any improper payments, offer or solicitations to our partners or employees. Reasonable, non-cash gifts having a token or nominal value are acceptable, provided that they are not intended and cannot be construed as a bribe, kickback or other form of compensation to the recipient.
- (D) Systems and practices to ensure fair competition, in compliance with all relevant competition laws and regulations. Suppliers will ensure that they do not take part in anti-competitive practices.
- (E) Clear procedures to oversee gifts and hospitality to prevent unethical practices, including appropriate record keeping.

4. **Part 4: Data security and privacy**

- 4.1 Suppliers should have in place policies to ensure data privacy and data security. Simmons & Simmons expects suppliers to appropriately protect all information and data received from the firm according to the sensitivity of the data received, and in accordance with industry recognised good security practices.
- 4.2 We expect suppliers to comply with all relevant data protection laws and regulatory obligations in relation to information collection, storage, processing, transmission and sharing in relation to personal data.
- 4.3 Wherever suppliers are aware of a security and/or data privacy incident that affects or has the potential to affect Simmons & Simmons, they must inform Simmons & Simmons immediately.

5. **Part 5: Diversity and inclusion**

Simmons & Simmons is an equal opportunity employer that values diversity and inclusion. We have clear targets for our progress and our supply chain is an important part of our impact. We expect our suppliers to demonstrate a commitment to equality of opportunity for all individuals and groups, enabling them to live their lives free from discrimination,

harassment or oppression including employees, customers, suppliers and local communities. All suppliers must comply with all laws prohibiting discrimination.

6. **Part 6: Sanctions and export controls**

- 6.1 Suppliers must comply with all applicable economic, trade, financial export control or other restrictive measures, including sanctions imposed or administered by the United Nations, the United Kingdom, the European Union, the United States, and any other applicable sanctions regimes.
- 6.2 Suppliers shall not directly or indirectly engage in any activity that would cause Simmons & Simmons to breach, or be exposed to a risk of breaching, applicable sanctions or export control laws, including dealings with sanctioned persons or restricted jurisdictions or any act intended to circumvent such laws.
- 6.3 Suppliers must maintain appropriate controls to manage sanctions risk and must promptly notify Simmons & Simmons of any actual or suspected sanctions breach or restriction affecting the services.

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