SUPPLIER CODE OF BUSINESS

Introduction

Burness Paull is a leading independent law firm, based in Scotland and providing advice and support to our clients, both in the UK and internationally. Our focus is on delivering success for our clients. In doing so, we strive to achieve the highest standards of conduct, professionalism and ethics and we are committed to complying with all applicable laws as well as the professional obligations we have as a firm of solicitors.

This Code sets out the values and principles that are important to us and which we expect all our suppliers to adopt and follow. We seek to work with suppliers who contribute to sustainable development and are economically, environmentally and socially responsible. It is also to ensure our compliance with legal requirements including those relating to anti-bribery and corruption, modern slavery, financial crime and data protection.

Key principles

We expect our suppliers to adhere to the following principles:

**Employment:** Suppliers must adopt fair and ethical employment practices. Suppliers must take steps to ensure that slavery and human trafficking are not occurring in their business or in their supply chain. Suppliers must notify us immediately if they become aware or have reason to believe that they, or any of their officers, employees, agents or sub-contractors have breached or potentially breached any of the provisions of this requirement on modern slavery.

**Health & Wellbeing:** Suppliers must take a proactive approach to the wellbeing of their workforce. Suppliers should have policies and/or procedures in place which commit to health and wellbeing in the workplace, in addition to meeting their duties as an employer and complying with relevant health and safety legislation.

**Diversity & Inclusion:** Suppliers must promote equal opportunities for all and embrace diversity in the workplace. Suppliers should have in place policies which explicitly prohibit discrimination on any ground including sex, race, religion or belief, social background, gender, gender identity, sexual orientation, marital status, disability or age and procedures for any concerns to be raised.

**Conflict of Interest:** Suppliers must take active steps to manage and disclose to us any actual, potential or perceived conflicts of interests in relation to their engagement with us.

**Bribery & Corruption:** Suppliers must not tolerate, permit or engage in bribery, corruption or unethical practices. The highest standard of integrity is expected from all of our suppliers. We expect suppliers to fully comply and procure that their affiliates fully comply with all applicable United Kingdom laws, statutes and regulations relating to anti-bribery and anti-corruption including but not limited to the Bribery Act 2010. If at any time suppliers have knowledge of, or have reasonable grounds to suspect the occurrence of a breach of this anti-bribery and corruption requirement, they are required to notify us without delay and co-operate with us in the investigation of such breach or suspected breach.

**Criminal Conduct:** Suppliers must have in place systems and controls that enable them to identify, assess, monitor and manage their business risk of criminal conduct including money laundering and fraud, proportionate to the nature, scale and complexity of their activities.

**Business Continuity:** Suppliers must have proportionate business continuity capabilities in place. We expect relevant suppliers to have a robust and flexible capability to respond quickly to manage and recover safely from any disruptive events, reducing the impact on us and the service we provide to our clients.
**Information Security:** Suppliers must respect and protect the confidentiality of our and our clients’ data. Confidentiality and protection of our data is a cornerstone of our business. Suppliers must ensure that our information is kept and transmitted in a confidential and secure manner. To the extent relevant to the service they provide to us, suppliers must be able to demonstrate compliance with information security best practice frameworks, policies and procedures and provide evidence of secure networks, IT operations, development and change activities for technology assets along with procedures for the timely identification and management of incidents.

**Privacy & Data Protection:** Suppliers must comply with all privacy and data protection laws. Suppliers must notify us without delay if they are aware of any security incident that may affect the confidentiality of our data or that of our clients including any personal data breaches.

**Environmental sustainability:** Suppliers must run their business in an environmentally responsible manner, as well as complying with all applicable environmental laws and regulations. We expect you to set yourself stretching targets to implement best practice procedures aimed at reducing the impact of your business on the environment and to be able to evidence your efforts to achieve them.

**Compliance**

We reserve the right to audit all of our suppliers at any point to confirm that they have in place the appropriate policies and procedures in place to ensure compliance with this Code.

We expect you to ensure that;

1. relevant personnel are informed about this Code; and
2. all your directors and employees and any sub-contractors you appoint comply with the standards described in this Code as if they had also signed it

This Code is monitored on an ongoing basis and may be updated.

This Code contains general requirements for our suppliers. Particular contracts with suppliers may contain further specific provision addressing similar issues. In the event there is any inconsistency between this Code and any contractual provision, we expect you to adhere to the contractual provisions.

**Supply chain compliance**

We expect you to ensure that your own supply chain is also meeting high ethical standards. You must carry our appropriate due diligence on your own suppliers and require them to adhere to standards which are similar to those set out in this Code. On request, you will provide us with details of the due diligence that you undertake.

10 January 2022