

## 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 are the minimum standards 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 in line with our commitment to the UN Global Compact and its sustainability goals. 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

As a supplier to Burness Paull, we expect you to adhere to the following principles:

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

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

**Diversity & Inclusion:** You must promote equal opportunities for all and embrace diversity in the workplace. You shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement or any employment practice based on race, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy status, disability, union membership or political affiliation or any other characteristic other than the worker's ability to perform the job subject to any accommodations required or permitted by law.

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

**Bribery & Corruption:** You 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 you to fully comply and procure that your 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 you have knowledge of, or has reasonable grounds to suspect the occurrence of a breach of this anti-bribery and corruption requirement, you shall notify us without delay and you shall co-operate with us in the investigation of such breach or suspected breach.

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

**Business Continuity:** You 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:** You must respect and protect the confidentiality of our and our clients' data. Confidentiality and protection of our data is a cornerstone of our business. You must ensure that our information is kept and transmitted in a confidential and secure manner. To the extent relevant to the service you provide to us, you 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:** You must comply with all privacy and data protection laws. You must notify us without delay if you 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:** You must run your business in an environmentally responsible manner, as well as complying with all applicable environmental laws and regulations. We expect you to take actions to identify, track and improve your environmental performance across all your operations and services. 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

### **Supply chain compliance**

We expect you to ensure that your own supply chain is also meeting high ethical standards. You must carry out appropriate due diligence on your own suppliers and require them to adhere to standards which are similar to those set out in this Code.

### **Compliance**

We reserve the right to audit all of our suppliers at any point to confirm that you 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 contains general requirements for all of our suppliers. Particular contracts with suppliers may contain further specific provisions addressing similar issues. In the event that there is any inconsistency between this Code and any contractual provision, the contractual terms will take precedence.

You agree that you will comply with the requirements in this Code, you have appropriate systems in place to ensure continuous compliance and can demonstrate such compliance to us upon request.

We reserve the right to modify this Code from time to time, with the latest version available on our website.

April 2023