

Supplier Code of Conduct

Introduction

White & Case, a global law firm comprising White & Case LLP, a limited liability partnership registered in the State of New York in the United States of America and its related partnerships and associations (together, "**White & Case**," the "**Firm**," "**we**," "**our**" or "**us**"), is committed to responsible business practices and adheres to the highest level of integrity, ethical behaviors and professional standards. This Supplier Code of Conduct (the "**Code**") reflects the Firm's commitment to ensuring that our suppliers subscribe to these values.

We expect integrity from individuals or organizations that provide goods or services to us ("**Suppliers**"). We strive to work only with Suppliers that ensure fair and ethical work conditions, where individuals working for a Supplier, either under a contract of employment or informally ("**Workers**"), are treated with dignity and respect and that the highest standards of human rights are upheld. Accordingly, we have created this Code, which sets out the standards we expect from every Supplier with whom we do business.

Scope

This Code applies to all Suppliers and their subsidiaries and subcontractors that provide goods or services to the Firm. While the Firm recognizes that there are different legal, corporate and cultural environments in which Suppliers operate globally, this Code establishes a framework that we consider important to managing our supply chain. If compliance with any provisions of this Code would directly or implicitly result in a Supplier violating legal or regulatory obligations, then the Supplier must adhere to the highest standard allowed under such law or regulation. Where the Code and a Supplier agreement conflict, the Supplier agreement prevails.

Supplier and supply chain compliance

As a prerequisite to the provision of goods and services to the Firm, all Suppliers must confirm on their behalf and on behalf of their subsidiaries, Workers, authorized representatives and subcontractors in their supply chain that they will comply with the requirements set out in this Code.

Suppliers must be able to demonstrate compliance with the Code at all times. Suppliers must permit us to audit their compliance with the requirements set out in this Code, including through the use of questionnaires, auditors and site visits.

In the case of non-compliance, White & Case reserves the right to cease trading with such Suppliers.

In complying with this Code, we expect Suppliers to promote whistle-blowing within their companies and to have internal policies and procedures to encourage personnel to voice genuine concerns about legal or ethical matters. We also expect Suppliers to conduct appropriate due diligence on their own Suppliers and to require them to adhere to standards similar to those set out in this Code.

1. Compliance with the law and ethical practices

The Firm expects its Suppliers to be committed to high ethical standards and to comply with all applicable laws, regulations, standards, guidance or directions (the “**Applicable Laws**”) when supplying goods or services to the Firm.

Specifically, Suppliers are expected to have policies and procedures to ensure compliance with:

- (a) **Anti-bribery and corruption laws** – The Firm prohibits improper payments or influence in its business and decision making and demands the same from those with whom it conducts business. Therefore, Suppliers must:
 - (i) comply with all Applicable Laws relating to the prevention of bribery, corruption, fraud or similar or related activities (including, where relevant, the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977, the Canadian Corruption of Foreign Public Officials Act (as amended) 1998 and the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017);
 - (ii) (with the exception of low-value items) not give or receive gifts of any significance in its business or supply chain. Certain gifts are never permissible including cash, gift cards, lines of credit, instruments of ownership or anything redeemable for cash and
 - (iii) (other than as contemplated in the Firm’s Anti-Corruption policy) not entertain anyone who works for the Firm
- (b) **Anti-tax evasion and facilitation laws** – The Firm cannot contract with a Supplier who commits tax evasion in any jurisdiction in which the Supplier operates (including the facilitation of tax evasion) and
- (c) **Data protection and confidentiality laws and obligations** – Each Supplier must ensure protection of personal data in compliance with EU data protection laws, and, where the Supplier processes personal data for the Firm, it will enter into such data processing agreement required by the Firm. Suppliers must also protect the Firm’s confidential information in accordance with the highest industry standards

2. Human rights and employment laws

We expect our Suppliers to support the principles of the United Nations Global Compact and the United Nations Universal Declaration of Human Rights, as well as the

1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work. Suppliers shall comply with all applicable local and international human rights-related laws in respect of their Workers (including, where relevant, the Human Rights Act 1998 and the Modern Slavery Act 2015). Specifically:

- (a) Suppliers shall conduct their business activities in a manner that respects human rights as set out in the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organisation
- (b) Suppliers must employ Workers in compliance with applicable employment laws and other laws relating to freedom of association, collective bargaining, immigration, working periods and remuneration (including overtime and benefits imposed by law), and equality of treatment, health and safety.
- (c) Suppliers must not:
 - (i) hold another person in slavery or servitude
 - (ii) employ, engage or otherwise use forced, bonded, compulsory labor or trafficked labor
 - (iii) engage in or condone the use of corporal punishments or mentally, physically or sexually abusive or inhumane treatment of Workers
 - (iv) oblige Workers to lodge identity papers (such as passport or resident permit cards) or pay any deposit or bond as a condition of work
 - (v) impose monetary or other penalties on Workers that is triggered by them leaving employment
 - (vi) deny Workers the freedom to leave the Supplier after reasonable notice is served
 - (vii) treat or make demands of their Workers that might lead them to violate human rights. This includes routinely making late payments or placing late orders and
 - (viii) engage in any practices that are known to contribute to the risk of modern slavery. These include charging Workers recruitment fees or costs
- (d) Suppliers must comply with all applicable local laws with regard to the minimum working age for Workers. If no such law exists or if the existing local law permits the hiring of Workers younger than 18 years of age, the Supplier may not employ Workers younger than 18 years of age except where the Worker is above the age for compulsory education and the work is non-hazardous

(e) Suppliers are expected to respect the right of every Worker to participate in all aspects of employment without regard to their personal characteristics or beliefs. Specifically, Suppliers must:

- (i) comply with all applicable anti-discrimination laws and actively promote diversity and inclusion within their own workplace, including in recruitment, retention and promotion practices;
- (ii) provide a workplace free of harsh and inhumane treatment or threats of such treatment; and
- (iii) have appropriate policies and procedures in place to deal with Workers, disciplinary or grievance issues.

3. Worker's health and safety

Suppliers shall comply with all applicable health and safety laws and regulations and be committed to providing a safe and hygienic working environment for their Workers and anyone else affected by their businesses. This includes:

- (a) ensuring adequate fire and life safety systems and equipment
- (b) protecting Workers from harmful pollution, toxic materials and waste
- (c) implementing appropriate health and safety training and procedures to prevent accidents and injury at work
- (d) providing Workers with clean drinking water and
- (e) ensuring adequate emergency and evacuation procedures for each workplace

4. Environment

All Suppliers shall comply with all applicable environmental laws and regulations (including those related to pollution, waste disposal, air emissions and discharges). All necessary environmental permits and licenses shall be obtained and maintained. We also expect Suppliers to commit to implementing best practices and initiatives aimed at reducing the impact of their business on the environment. This includes:

- (a) where possible, avoiding the use of hazardous materials
- (b) committing to recycling
- (c) safe handling, storage, recycling and management of waste in order to minimize the impact on human health and the environment

(d) having systems in place to prevent and mitigate accidental spills and

(e) continually strive to improve their sustainability performance, focusing on reduction (as appropriate) of waste, carbon emissions, water and the consumption of natural resources.

5. Fair competition

The Firm believes in free competition and fair business practices. Suppliers shall follow fair and competitive business practices and antitrust laws. Suppliers shall not propose or enter into any agreement with another Supplier or potential Supplier of the Firm or others in their sector to fix prices, terms and conditions of sale or service, costs, profit margins or anything similar.

6. Conflicts of interest

Suppliers shall supply goods or services to the Firm in a lawful, open and transparent manner.

Suppliers shall anticipate and use all reasonable efforts to identify potential conflicts of interest in their supply of goods and services to the Firm, immediately report the same to the Firm in writing and, if possible, promptly assist to resolve the conflict in an acceptable manner for the Firm.

Reporting

The Firm's employees and the public are encouraged to report or raise ethical concerns, violation of this Code or Applicable Laws with no reprisal through the Firm's confidential Whistleblower Hotline at +1 212 819 8844.

Reports made to the Hotline are sent to the Firm's General Counsel for further investigation.

