

WATSON FARLEY & WILLIAMS

WATSON FARLEY & WILLIAMS ("WFW") - GLOBAL SUPPLIER CODE OF CONDUCT

Introduction

At Watson Farley & Williams ("**WFW**") we are committed to maintaining high ethical standards and embedding a Responsible Business approach across our operations and value chain.

This Supplier Code of Conduct sets forth the principles and standards expected from all suppliers and contractors who are commercially engaged by WFW (collectively referred to as "**Suppliers**"), insofar as compliance does not conflict with applicable law. These principles and standards align with the United Nations Global Compact ("**UNGC**").

Whilst we recognise that our Suppliers operate across a range of different legal and cultural environments, we expect Suppliers to adhere to the following essential principles and ensure compliance throughout their operations and supply chains.

We complete compliance checks on Suppliers prior to executing contracts with a "Medium Value", or higher, as defined in the WFW Procurement and Supplier Compliance Policy. We require all Suppliers for contracts with a "Medium Value" or higher (and WFW will notify relevant Suppliers where contracts are of such a value) to confirm that they have policies and processes in place to enable compliance with this Supplier Code of Conduct as part of checks completed before contracts are awarded.

We also reserve the right to request evidence of compliance from any Supplier in the areas set out below, including as part of a contract review. Current Suppliers may therefore be precluded from continuing to supply WFW where they have not completed required compliance checks, provided information on policies and procedures, or taken corrective action as required.

Compliance with Laws and Regulations

All Suppliers are expected to comply with applicable international, national, and local laws and regulations, including those pertaining to:

- Labour and employment practices;
- Health and safety standards;
- Environmental protection;
- Anti-corruption measures; and
- Data protection and security.

Human Rights

Suppliers shall support and respect the protection of internationally proclaimed human rights. Suppliers must:

- Ensure that their business practices respect the human rights of all employees, customers, and communities;
- Prevent complicity in any form of human rights abuses; and
- Avoid discriminatory practices and promote diversity, equity, and inclusion within their operations.

Labour Standards

Suppliers are required to uphold fair labour practices in alignment with the International Labour Organization's core conventions. This includes:

- Freedom of Association and Collective Bargaining: Recognize and respect employees' rights to join unions, form associations, and engage in collective bargaining;
- Elimination of Forced Labour: Prohibit all forms of forced, bonded, or involuntary labour, including human trafficking;
- Abolition of Child Labour: Ensure that no child under the legal employment age is employed, and that any workers under the age of 18 are protected from hazardous work;
- Fair Wages and Working Hours: Provide fair wages and benefits that meet or exceed legal requirements and ensure that working hours are not excessive and comply with local laws and regulations; and
- Safe Working Conditions: Provide employees with a safe and healthy working environment, in compliance with applicable laws, and take proactive measures to prevent accidents and injuries.

Environmental Responsibility

WFW expects its Suppliers to demonstrate environmental stewardship and actively work to reduce their environmental impact. This includes:

- Compliance: Adhere to all applicable environmental laws and regulations;
- Sustainability: Wherever possible, implement practices that reduce waste, minimize energy consumption, and lower greenhouse gas emissions. Suppliers should also work to promote the sustainable use of natural resources;
- Pollution Prevention: Take all necessary precautions to prevent pollution, including appropriate waste management practices and minimizing the use of harmful chemicals;
- Climate Change Action: Collaborate with WFW where possible to adopt a joint approach to sustainability when working together, including sharing relevant data to inform carbon calculations.

Anti-Corruption and Ethical Business Practices

WFW has a zero-tolerance policy for corruption, bribery, and unethical business conduct. Suppliers must:

- **Prohibit Corruption and Bribery:** Avoid any form of bribery, corruption, extortion, or embezzlement. Suppliers must never offer or accept bribes or engage in other corrupt practices;
- **Ensure Fair Competition:** Conduct business in full compliance with antitrust and competition laws;
- **Avoid Conflicts of Interest:** Disclose any potential conflicts to WFW;
- **Be Transparent and Accountable:** Operate with transparency in all business dealings, maintaining accurate records and disclosures;

Community Engagement and Social Impact

Suppliers are encouraged to contribute positively to the communities in which they operate. WFW values:

- **Local Community Support:** Engaging with and supporting local communities, respecting their rights, and contributing to their well-being;
- **Social Investment:** Actively participating in initiatives that promote social development in areas relevant to the business.

Data Protection, Security and Privacy

All Suppliers are expected to comply with their obligations regarding data protection and privacy and to prioritise data security. This includes:

- Making every reasonable effort to comply with WFW security standards and requirements, including data protection laws and regulations relevant to their product and geographical scope of deployment.
- Ensuring the privacy and confidentiality of personal and business information is safeguarded with adequate data security measures and policies in place.
- Remediating or mitigating any specific risks reported by WFW.
- Cooperating with information requests and compliance audits in a timely and efficient manner.
- Consenting to the use of non-intrusive tools to assess levels of security and compliance.

Monitoring and Accountability

Suppliers must:

- Provide accurate and timely information in response to any requests from WFW for verification of compliance, including as part of contract reviews;
- Have policies and procedures in place designed to ensure that their subcontractors and third-party suppliers comply with the principles of this Code;
- Take corrective action as necessary to address non-compliance, with the understanding that repeated or serious violations may result in termination of the business relationship.

Document Information

Document History

Authors:	
Date:	07/03/2025
WFW document owner:	Simon Muir
Where Published:	External WFW Website

Review and Approval

This document requires the following approvals:

Name:	Title:	Date Approved:	Comments:
Lindsey Keeble	Managing Partner	March 2025	

Document Version Control

Version	Date	Author	Comments
1.0	07/03/2025	Harishan Thevarajah	

This is a WFW document. It will be reviewed at least annually. If you have any feedback on this document, please contact the document owner set out above.