

CODE OF BUSINESS CONDUCT

MAY 2024

Slaughter and May is a leading international law firm, providing an extensive range of legal services to a diverse range of clients. We seek excellence in every aspect of our business and are committed to the highest standards of professionalism, ethics and integrity. Furthermore, we are committed to complying with all applicable laws and the professional rules which apply to us as a firm of solicitors and to observing the highest standards of propriety.

It follows that our partners and staff understand that they must:

- **reject bribery and corruption** - this means that they will not:
 - offer, promise or give any financial or other advantage to anyone, including a public official, (whether on our behalf or on behalf of any other person, including any client) for any improper purpose or to influence any public official in the exercise of his or her functions; or
 - request or accept any such advantage;
- **avoid being compromised by gifts and entertainment** - although giving and entertainment practices may vary according to local customs or practice, any gifts or entertainment given or received must be in compliance with applicable laws and must not knowingly breach any internal policies which apply to the giver or receiver;
- **not facilitate criminal conduct by any other person** - this means that they will not aid, assist or enable another person to commit a crime. This may limit the extent to which it is possible to comply with client instructions and extends, but is not limited to, facilitating fraud and crimes relating to payment of taxes;
- **play a role in combating financial crime** - by complying with applicable anti-money laundering and anti-terrorism laws;
- **avoid personal conflicts of interest** - any actual or potential personal conflicts must be reported internally as soon as possible so that immediate steps can be taken to resolve any impression of personal bias;
- **not deal in shares or other securities when in possession of inside information** - everyone who works for us must observe the firm's own strict rules limiting dealing in shares and securities, not only to eliminate the risk of insider dealing but also to avoid any perception of impropriety;
- **respect all employment rights and protections** - including those aimed at eliminating slavery, servitude and forced, compulsory and child labour;
- **support the firm's aim to be diverse and inclusive** - by not discriminating on the grounds of sex, race, religion or belief, gender, gender identity, sexual orientation, marital status, disability or age as well as by promoting equality, valuing diversity and helping to create an open and inclusive work environment;
- **treat individuals fairly and with dignity and respect** - by not engaging in unwanted, unacceptable and inappropriate behaviour. This can include bullying, harassment, discrimination, sexual harassment or victimisation;
- **play a part in looking after the environment** - by supporting the firm's initiatives to promote greater environmental responsibility, as well as by complying with all applicable environmental laws and regulations;

- **protect and secure confidential and personal data** - all confidential and personal data must be kept securely by our partners and staff who must:
 - protect data from loss, destruction or damage by using the firm’s technical and organisational measures; and
 - take steps to ensure their actions do not risk unauthorised or unlawful access or processing of such data; and
- **raise any concerns** - by following the firm’s “raising concerns informally guidelines”, its internal “whistleblowing” policy, or simply speaking to a partner, manager or supervisor, if they suspect or know of any behaviour which falls below the standards required by the SRA, breaks or may break the law or have any similar concerns.

We will also make sure that our key suppliers understand that we expect them to adhere to similar standards and to maintain the highest standards of professionalism, ethics and integrity.

All our partners and staff have access to this Code through the Slaughter and May intranet. The principles in it are reinforced through periodic training and included in the induction of new staff.

The operation of this Code and associated procedures will be monitored and reviewed by our Managing Partner to ensure that we continue to maintain the highest standards in this area.

Approved by:
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