



HERBERT SMITH FREEHILLS KRAMER THIRD PARTY COMPLIANCE STANDARDS

September 2026

Herbert Smith Freehills Kramer provides a full and extensive range of legal services to a diverse body of clients. We seek excellence in every aspect of our business and are committed to the highest standards of professionalism, ethics and integrity. This includes a commitment to working with **third parties**¹ to ensure a high level of compliance. We look for compliance in the categories set out below and expect third parties to share our commitment and to have their own internal policies and procedures in place to support such commitment. Where incorporated into any contract, these Compliance Standards shall survive the contractual term.

1. Confidentiality

- 1.1 Herbert Smith Freehills Kramer treats the information of our clients and staff with the utmost respect. As a law firm we have professional obligations of confidentiality and it is important that you understand this.
- 1.2 We expect you to keep all information received about any Herbert Smith Freehills Kramer entity, client, or staff member confidential. You must put in place safeguards to ensure that access to confidential information is appropriately restricted. We may require you to enter into a non-disclosure agreement on appropriate terms when confidential information is to be shared outside of other contractual protections.

2. Information Security

- 2.1 We are committed to maintaining the highest standards of information security when it comes to handling our clients', employees', and our own, information.
- 2.2 You are expected to put in place appropriate technical and organisational measures to protect information received about any Herbert Smith Freehills Kramer entity, its clients or its staff.
- 2.3 We expect you to have your own internal information security policy and if applicable, security compliance certifications, which will be made available to us for review. If we have concerns about the adequacy of the security measures, we may require you to comply with Herbert Smith Freehills Kramer's Information Security Policy and Supplier Security Standards, which outline the behaviours and security measures required in protecting the information of our clients and the firm.

3. Artificial Intelligence

- 3.1 Any AI used in the course of performing the services is expected to meet the Information Security requirements above, and to have been implemented in line with industry best practices. Use of information received from us in public generative AI tools or in any AI system where it may be used to develop, train or fine-tune an AI model or system is strictly prohibited.
- 3.2 We expect you to maintain records of AI processing activities and to notify us without undue delay of any suspected unauthorised disclosure, retention, or misuse of confidential information by AI systems, including if such information may have been incorporated into training data or otherwise exposed.
- 3.3 We expect you to take all reasonable steps upon completion of your engagement with the firm to ensure that our confidential information has been deleted from AI systems and cannot be recovered or reconstructed from any AI model or system memory.
- 3.4 We expect you to be aware of and comply with all applicable laws and regulations, including but not limited to the EU AI Act 2024, and any sector-specific AI governance requirements that may apply to your operations.

¹ We use "third parties" in this document to mean both (i) service providers and other suppliers who provide services or goods to Herbert Smith Freehills Kramer entities and (ii) service providers and other suppliers (including law firms) who provide services to our clients, where we are involved in their engagement (although only as an agent or intermediary for our client).

4. Data Protection and Privacy

- 4.1 Herbert Smith Freehills Kramer is fully committed to compliance with its obligations in relation to the handling and use of personal data under applicable data protection and privacy laws in force from time to time. These laws include, but are not limited to, the EU General Data Protection Regulation, the UK General Data Protection Regulation, the UK Data Protection Act 2018, the Australian Privacy Act 1988, the California Consumer Privacy Act, and all other data protection and privacy legislation applicable in the jurisdictions in which we operate or to which our personal data is transferred or in which it is processed (together, "Applicable Data Protection Laws").
- 4.2 We expect you to be fully aware of, and comply with, all Applicable Data Protection Laws relevant to your engagement with us. Where you process personal data on our behalf, on behalf of our associated entities, or our clients, there may be jurisdiction-specific data protection and privacy provisions which you will need to comply with. You must not do, or omit to do, anything that would prevent us, our associated entities, or our clients from complying with Applicable Data Protection Laws.

5. Anti-Bribery and Corruption

- 5.1 Herbert Smith Freehills Kramer is committed to preventing bribery and corruption. Herbert Smith Freehills Kramer has anti-bribery policies designed to prevent persons employed by or performing services on its behalf from paying or receiving bribes.
- 5.2 It is important to us that you share our commitment to preventing bribery and corruption. We expect you to have similar policies, or to comply with Herbert Smith Freehills Kramer's anti-bribery policies.
- 5.3 Our policy specifically prohibits dealings for the purpose of improperly obtaining or retaining business or for any other improper purpose or business advantage, as well as the making of facilitation payments.
- 5.4 We expect you to act in the best interests of us or our client and take steps to avoid, or disclose, conflicts in your provision of goods or services to us or our client.
- 5.5 You must not offer any partner or employee of Herbert Smith Freehills Kramer or a client any gift or hospitality of such value that it might have the effect, or perceived effect, of improperly influencing their decisions.

6. Sanctions Compliance

- 6.1 It is the firm's policy to adhere to all applicable sanctions laws and regulations and we expect you to do the same.
- 6.2 You must not cause us to breach applicable sanctions laws. You must tell us if you (or any parent, subsidiary, involved supplier or other connected party) become subject to sanctions and if you (or any of the related parties mentioned) are, or become, owned or controlled by a sanctioned person to any extent.

7. Tax Evasion

- 7.1 It is the firm's policy to adhere to all applicable tax laws and we expect you to do the same. We expect you to implement appropriate procedures, systems and controls relevant to your business to prevent the criminal facilitation of tax evasion.
- 7.2 We do not tolerate tax evasion (or any form of financial crime) and any third parties found to be engaging in these practices may be reported to the relevant authorities.

8. Fraud

- 8.1 Herbert Smith Freehills Kramer is committed to preventing the commission of fraud. It is the firm's policy to comply with all applicable fraud laws and regulations.
- 8.2 We expect you to share our commitment to preventing fraud. You must implement reasonable measures to prevent and detect fraudulent conduct by your employees, subcontractors and others acting on your behalf in connection with the goods or services you provide to our people.

9. Modern Slavery

- 9.1 Our Modern Slavery statement is published on our website. We are continually working towards ensuring that our policies and procedures comply with the requirements of applicable modern slavery legislation and operate in accordance with our Responsible Procurement policy.
- 9.2 We expect you to consider the requirements of any applicable legislation, and to the extent possible examine your own supply chain to highlight the risk areas in relation to slavery and human trafficking.
- 9.3 We expect you (whether you are required to comply with the applicable legislation or not) to give due consideration to what the legislation seeks to address (including considering and addressing parts of your own supply chain that are at risk of slavery and human trafficking) and act in accordance with the spirit of the legislation.

10. Workplace Health & Safety

- 10.1 We expect you to be fully aware of and abide by your obligations under applicable workplace health and safety legislation, regulations and standards, and to have in place an internal policy to ensure compliance with such obligations.
- 10.2 We expect you to have an internal policy governing discrimination, harassment (including sexual harassment) and other unacceptable behaviours. Such policy should make it clear that unacceptable behaviour by your staff towards third parties (including our people) will not be tolerated.

11. Labour Laws (including Labour Hire Licensing)

- 11.1 We expect you to pay fair wages and compensate workers in accordance with all applicable labour laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- 11.2 We expect you to follow all applicable laws and regulations with respect to working hours.
- 11.3 We adhere to all applicable labour hire licensing laws and, where required by law, we will only engage suppliers of labour hire services who hold and maintain a labour hire licence. Where applicable, providers must provide any necessary labour hire licences to us prior to the provision of services and at other times on our request.

12. Competition

- 12.1 It is the firm's policy to comply with relevant competition laws. We expect you to do the same and to assist us in our compliance.
- 12.2 Accordingly, you must not share information with us which might result in an anti-competitive effect or object. This would include for example: specific information about significant costs of our competitor firms, the markets in which they compete, and the means by which they deliver key services and make key strategic decisions. If in any doubt, describe to us in advance the nature of information you consider passing to us, and we will advise whether we are able to receive it.

13. Regulatory Compliance

- 13.1 As a global firm of legal professionals, our practice and conduct are regulated in every jurisdiction where we operate. Our regulators have a say in the way we do business, and they regulate our relationships with third party suppliers and service providers. We expect you to recognise the fact that we are subject to such regulatory obligations (the nature and extent of which may differ from one jurisdiction to the next) and that it may affect our dealings with you.
- 13.2 Where you have access to confidential information, we expect you to permit audits to be carried out as required by our professional regulators and to provide every assistance reasonably requested.

14. Dignity and Respect

- 14.1 We do not tolerate any form of discrimination, bullying, harassment (including sexual harassment) or unacceptable/inappropriate behaviour. We expect our suppliers to share our commitment, which includes demonstrating through your actions that you treat all individuals, including both our people and your own employees and suppliers, with dignity and respect.

15. Continued responsibility

- 15.1 Notwithstanding your involvement or engagement of any employees, subcontractors, agents, service providers or other third parties, or your use of artificial intelligence tools or systems, in connection with the goods or services you provide to us, you remain responsible for compliance with these Compliance Standards. You must ensure that any such persons, entities, tools or systems act or operate in compliance with these Compliance Standards as if they applied directly to them. This reminder does not, in itself, constitute authorisation to use artificial intelligence tools or engage other service providers.