



RESPONSIBLE PROCUREMENT POLICY*

Herbert Smith Freehills Kramer is committed to minimising the adverse social and environmental impacts within our supply chain. We partner with, and prioritise, suppliers who not only embed sustainable and ethical practices in their organisations but also promote these practices within their own supply chains. Our Responsible Procurement Policy incorporates these social, environmental, and ethical considerations into purchasing decisions, and is applicable to all purchases of goods or services made by or on behalf of Herbert Smith Freehills Kramer.

1.1 OUR COMMITMENTS:

Where reasonable and practical we endeavour to:

- Engage with suppliers to determine the sustainability of goods and services we purchase.
- Use sustainability criteria in the awarding of contracts.
- we strive to prevent any negative impacts on human rights when procuring goods or services, and we actively address such issues if they arise in the course of our purchasing activities. This is in line with our commitment to combat modern slavery.
- Purchase goods and services that comply with applicable laws relating to environmental protection, occupational health and safety, non-discrimination, and the protection of internationally recognised human rights.
- Conduct an annual evaluation of our key suppliers' responsible business practices.
- Review and survey suppliers who are high-risk of modern slavery based on the services they provide or the geographical locations in which they operate and, if necessary, after appropriate discussion and mediation, as relevant, terminate our arrangements with such suppliers.
- Share information about, and ensure our suppliers understand, our approach to responsible business and seek partnerships with those who actively champion similar values/support our aims and values within their own organisation.
- Ensure that this Policy is available for public review on request.

In all cases

- deal with all our suppliers and potential suppliers fairly and ethically and in accordance with this Policy.
- protect the confidentiality of information entrusted to us.

1.2 OUR EXPECTATIONS OF SUPPLIERS:

Human rights

Seek ways to honour the principles of internationally recognised human rights and avoid causing or contributing to adverse human rights impacts through their own activities.

Policies and Laws

- Maintain and apply in practice effective policies and procedures to manage environment, health and safety and social and ethical issues encountered in their business.
- Pay employees the minimum legal wage by law in any jurisdiction and ensure that all facilities and working conditions are free from danger and safe environment.
- Ensure adherence to all local health and safety laws and support employees in their development and training needs around responsible procurement.

Sustainability

- Commit to science-based targets.
- Support the reduction and use of plastic within its goods and services delivered to Herbert Smith Freehills Kramer.
- Monitor and, wherever possible, take action to reduce any adverse sustainability impacts, including energy usage, from the operations of organisations in their own supply chain.

Engagement

- Engage with us on social, ethical, and environmental issues and provide relevant information on performance where requested.

Diversity & Inclusion

- Fully comply with applicable local regulations on diversity and inclusion.

Fair operating practices

- Use responsible business practices and comply with all applicable local laws and mandatory requirements concerning environmental protection (including energy efficiency), human rights and health and safety of persons in the workplace.

Community involvement and development

- Suppliers are expected to actively contribute to their local communities. This could include promoting education and culture understanding, creating employment opportunities, and facilitating skills development to help individuals reach their full potential.

1.3 GOVERNANCE AND ACCOUNTABILITY:

We have:

- Assigned responsibility for this Responsible Procurement Policy to the Director of Responsible Business
- Measured and monitored the application of the Policy.
- Communicated this Policy to our key suppliers.
- Reviewed this Policy at regular intervals, to determine areas for improvement.

*This policy does not apply to our US operations