

EVERSHEDS  
SUTHERLAND

# Ethical Code of Conduct

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Our Ethical Code of Conduct sets out our expectations of our people in terms of their behavior towards each other, our clients and our wider stakeholders.

Its foundation is the applicable legal and regulatory framework within which we operate in each of our worldwide jurisdictions, reinforced by our purpose and our values which frame our wider commitment to ethical and responsible business practices.

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**The Code is built on the following eight core principles:**

1. We respect the rule of law
2. We always act in the best interests of our clients
3. We act ethically and with integrity at all times
4. We uphold the reputation of the firm and the high standards of the legal profession
5. We expect our people to follow all our internal policies
6. We provide training to ensure we meet our compliance responsibilities
7. We use our purpose of 'helping our clients, our people and our communities to thrive' to underpin our ethical standards
8. We use our values of inclusive, professional, open, creative and collaborative to guide our behavior, collectively and individually

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We encourage all our people to speak up if they become aware of actions that are inconsistent with our Code, any applicable legal or regulatory requirements, or our wider commitment to being a responsible business.

# Introducing our Ethical Code of Conduct

Our culture at Eversheds Sutherland is built upon our purpose – *helping our clients, our people and our communities to thrive* – with our values at the heart of everything we do.

We are committed to being a responsible business, and this Ethical Code sets out how we and our people should conduct themselves with our clients, our communities and each other in support of that commitment.

The Code is grounded in our belief that our people will instinctively act with integrity and honesty, always seeking to do the right thing, and acting in accord with any applicable legal and regulatory requirements.

All of our people are expected to adhere to the Code, know who to talk to if they have questions, and speak

up if they become aware of behavior that is inconsistent with it. We also encourage our clients and other third parties to let us know if they witness behavior by our people that they believe is inconsistent with the Code.

Our Ethical Code is an important part of our approach to being a responsible business, but it is by no means the full extent of our efforts. Alongside many other initiatives focused on ethics and sustainability, we are a participant in the UN Global Compact, and will be reporting annually as to our progress against various sustainable development goals established by the United Nations.



**Lee Ranson**  
Co-CEO

A handwritten signature in black ink, appearing to read 'Lee Ranson'.

**Mark Wasserman**  
Co-CEO

A handwritten signature in black ink, appearing to read 'Mark Wasserman'.

# Our clients

Providing reliable, high-quality services to our clients is at the heart of our business, and our people strive to deliver a level of service that consistently exceeds our clients' expectations.

At all times, we expect our people to act in the best interests of our clients, demonstrating due skill and care, and acting with loyalty, honesty, integrity and professionalism in all they do.

## **Appropriate use of information**

Our policies are designed to protect confidential information obtained in the course of our client relationships being used for personal gain or to benefit another client. We operate policies around trading in public securities and use information barriers to protect information as necessary.

## **Client engagement and communication**

Our policy is to confirm with clients the scope of our engagement so that our clients' and our own expectations are clear.

During the course of the matter, we are committed to ensuring clear, transparent communications. After the conclusion of a matter, we welcome client feedback, so that we can continue to monitor and improve our client service.

## **Confidentiality and security**

Confidentiality is essential to our client relationships, and we respect the trust placed in us to keep client information confidential. We maintain appropriate security standards and controls to protect confidential client and firm information from loss.

## **Conflicts of interest**

Central to acting in clients' best interests is ensuring that we do not act, without disclosure and consent, where a conflict of interests exists. Prior to accepting any new client or matter, we conduct conflict checks to identify and address any potential conflicts.

## **Data privacy**

We are committed to the protection of personal data and strong governance around the collection and use of information and data more generally.

We follow the data privacy laws and regulations that apply in the jurisdictions where data is collected or used and have established systems and processes in place to minimize access to, and manage the use of, personal data.

## **Knowledge sharing**

We foster a spirit of collaboration and openness, and knowledge sharing is expected among our lawyers and professionals for the benefit of our people and our clients. This means that we may involve others within the firm who have additional experience or insight on a particular issue, or bring in people from other practices or jurisdictions to ensure we deliver our best thinking on any subject.

## **Training and supervision**

As part of our commitment to client service excellence, we recognize the investment of time and talent required from our partners and leaders to build depth and strength across our legal service teams of the future. We provide extensive ongoing training and supervision to our people, to ensure that we continue to provide consistently high quality, reliable legal services to our clients.

# Our people

We expect our people to act ethically and with integrity at all times. We do not tolerate behavior that conflicts with our ethical standards or could detrimentally affect Eversheds Sutherland's reputation, including via the use of social media.

Our people are expected to understand and adhere to all relevant laws, regulations and other rules of professional conduct. When things go wrong, we expect our people to identify and admit to mistakes and not take any action to conceal them or blame others.

## **Anti-harassment**

We do not tolerate bullying, harassment, or any other form of victimization or intimidation. We encourage our people to speak up if they encounter or witness any such behavior.

## **Diversity and inclusion**

We are committed to growing and maintaining a diverse workforce that champions a wide range of perspectives and experiences, and building an inclusive, supportive and respectful environment where people feel able to bring their whole selves to work.

## **Health and wellbeing**

We are committed to maintaining a safe, healthy and engaging work environment that goes beyond complying with health and safety laws. We support the mental, social and physical wellbeing of our people.

We maintain a drug-free and smoke-free work environment and do not allow our people to attend work under the influence. We expect our people to be responsible when consuming alcohol at work-related events.

## **Non-discrimination**

We do not discriminate on the basis of age, gender, race, color, religion or belief, disability, national origin, gender identification, gender reassignment, sexual orientation, marital status, pregnancy and maternity, veteran status, reprisal or on any other basis when recruiting, hiring, allocating work, setting compensation, training, promoting, or concluding employment.

## **Personal relationships and outside interests**

We expect our people to disclose any personal relationships with colleagues, applicants, clients, suppliers or other relevant third parties, as well as any outside business interests, so that we can take appropriate steps to safeguard against any potential conflicts of interest.

## **Speaking up**

We expect our people to do the right thing by standing up for our purpose and values and to speak up if they become aware of behavior or actions that are inconsistent with this Code, any applicable legal or regulatory requirements, or our wider commitment to being a responsible business.

We stand with our people and will not take action against anyone who raises concerns in good faith and in the spirit of holding each other accountable.

While we encourage open and transparent communications wherever possible, we also have a confidential whistleblowing process to allow our people to anonymously report allegations of wrongdoing where preferred.

# Our communities

Our responsible business program is grounded in our purpose and embraces forward-thinking environmental, social and governance standards.

Underpinning our extensive community initiatives, we expect our people to respect the rule of law at all times. That includes complying with those laws designed to prevent criminal and other conduct which can distort our markets, undermine social and economic development and damage our communities. This includes money laundering and terrorist financing, fraud, bribery and corruption, and modern slavery.

## Access to justice

As a global law firm, we recognize our professional responsibility to promote the rule of law and access to justice, and to donate legal services, especially to the most vulnerable members of society. This includes representing individual low-income clients and non-profit organizations and taking on matters intended to protect civil and human rights and the rule of law.

## Anti-bribery and corruption

We take a zero-tolerance approach to bribery and corruption. Our policy is that our people should never offer or accept anything of value that is intended to improperly influence somebody in order to obtain or retain a commercial, contractual, regulatory or personal advantage, for the benefit of our firm, our clients or our people. This applies to all of our dealings, whether they are in the private or public sector, wherever they take place.

## Anti-money laundering

Before starting work for a new client, we perform due diligence with respect to client's identity, source of wealth, or source of funds.

We will not help others conceal proceeds from criminal or suspicious activities or use funds for illegal purposes. We are committed to promptly reporting any wrongdoing in line with our ethical obligations.

## Charitable giving

We encourage and empower our people to be involved within their communities through fundraising, volunteering, and providing pro bono legal services for those in need. We use our talents and time for the benefit of others. We provide benefits and incentives to foster participation in community action. We also have a responsibility to make financial contributions to charitable causes that benefit our communities and wider society.

## Environmental sustainability

We are committed to protecting our planet by reducing our environmental impact and promoting the conservation of natural resources – to this end, we have made a commitment to net zero carbon emissions by the year 2050 or sooner.

We monitor the impact of our travel and seek opportunities to eliminate travel where it is unnecessary. And we expect our people to actively support our sustainability efforts through reducing use, reusing where possible, and recycling.

## Human rights and labor

We respect the protection of internationally proclaimed human rights and take care that we are not complicit in human rights abuses. We affirm the freedom of association and stand against all forms of forced and compulsory labor and child labor.

We are committed to fair treatment in everything we do with our people. We pay fair compensation on an equitable basis, and only engage in fair and equitable recruiting and hiring practices.

**Modern slavery and human trafficking**

We are committed to minimizing the risk of all forms of forced labor and human trafficking within our global business and supply chain. We do not condone any form of slavery, human trafficking, forced labor or child labor, and we comply with applicable laws prohibiting such exploitation.

**Sanctions**

Our business acceptance procedures are designed to ensure that we act in compliance with all trade and financial sanctions that apply wherever we are practicing in the world. Where a client or third party may be affected by sanctions, we will only provide services to them, or in relation to them, where this is permitted by applicable laws.

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For more information about our Responsible Business program, please visit [eversheds-sutherland.com](https://www.eversheds-sutherland.com)

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