

# The Freshfields Supplier Code

**FRESHFIELDS**

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# For all Freshfields suppliers

At Freshfields, we seek excellence in every aspect of our business, including our supply chain.

We are subject to a wide range of legal, regulatory and professional requirements and are responsible for adhering to these rules to ensure we act ethically, obey the law and conduct our business responsibly (in the broadest sense of the term). Guided by the four principles of the United Nations Global Compact (UNGC), we are committed to upholding (among other matters) human rights, labour rights, environmental best practice and anti-corruption measures and look to prioritise these within our own operations and those of our suppliers.

For us, this begins with living our purpose, Being Freshfields values, and meeting our professional responsibilities. We deliver on these through our pro bono work and community impact initiatives, people, culture and inclusion efforts and our approach to business integrity, governance and environmental management, including our journey to net zero.

Our ambitions are reflected in our own Freshfields Code as well as in our expectations of our supply chain set out in this Supplier Code.

As a firm, we look to engage with service providers, platform partners, distributors, consultants, intermediaries and other suppliers (collectively ‘Suppliers’) who share our values, commitment and aspirations. We expect you to adhere to this Supplier Code and promote its principles within your own supply chains.

We look forward to working with you to achieve the objectives set out in this document.

**Georgia Dawson**  
Senior Partner  
March 2025

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# Introduction

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As a firm, we seek to create a better future for our clients, our people and the communities in which we live and work.

We are committed to the UNGC principles, observing the highest personal, ethical and professional standards and operating with integrity and respect at all times. As our trusted partners, we expect our Suppliers to do the same.

Key features and navigation

This Supplier Code (this ‘Code’) sets out the minimum standards we expect from our supply chain, and provides an overview of Freshfields’ own commitments, as particularly relevant to our Suppliers, across each of the above areas.

This Code is arranged into sections covering the four UNGC principles and wider professional and ethical conduct. It also focuses on the importance of speaking up and having appropriate channels and pathways in place for staff, Suppliers and other external stakeholders to raise concerns and complaints.

Where more information or guidance is available on Freshfields’ own commitments and approach to these matters, they are clearly signposted and can be accessed directly from this document.

This Code is supplemented by an addendum for some jurisdictions. In those cases, the specific requirements of the addendum form part of this Code.

Application

Freshfields is a global firm, and we recognise that our Suppliers operate in different legal and cultural environments. Many of our Suppliers also have their own codes, standards and policies covering similar subject matter.

Nonetheless, we ask that all Suppliers follow this Code. To the extent that a Supplier is unable to comply with any aspect of this Code due to a conflict with applicable laws and regulations, we nevertheless expect the Supplier to comply with the spirit of that part of the Code to the extent reasonably and lawfully possible.





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**Supplier due diligence, onboarding and contracting**

We expect Suppliers to be transparent in their practices and to be able to demonstrate compliance with this Code.

Our standard RfP template and Supplier questionnaire include specific questions on human rights, culture, environmental footprint and approach, information security, financial crime (including anti-bribery and corruption) and social responsibility. This ensures that sustainability is a core consideration of Supplier selection and onboarding.

The firm’s Mandatory Provisions are included in contracts with our Suppliers and reflect, and require adherence to, the principles set out in this Code.

**Assessment and audit**

We reserve the right to (offsite or onsite) audit Suppliers and to be provided with relevant information on request. If we become aware of a Supplier breach of this Code, we will give the Supplier a reasonable period to (i) remedy the breach or, if a remedy is not possible, (ii) implement a corrective action plan to neutralise any adverse impact or minimise its extent. If the breach has not been remedied within the relevant period or the measures in any applicable corrective action plan do not

achieve the stated objectives within the agreed timeframe, we reserve the right to cease our business relationship with the Supplier.

Accordingly, we may monitor the application of this Code through an assessment of our Suppliers using Freshfields’ or external resources, as appropriate. In January 2024, we partnered with an independent sustainability ratings platform to conduct comprehensive assessments of Suppliers’ sustainability practices, including to determine their carbon level maturity. We expect Suppliers to notify us of any material non-compliances with this Code that may arise within their own operations or their supply chains.

**Supplier engagement, training and capacity building**

We are committed to offering our Suppliers opportunities for capacity building, training and continuous improvement and expect their continuous cooperation. We also maintain open and transparent communication channels with our Suppliers, providing them with relevant information, feedback and support, as needed.

**Updates to this Supplier Code**

This Supplier Code is subject to annual review.

**We expect our Suppliers to:**

- follow all applicable laws and regulations in the jurisdiction(s) where you operate and are incorporated
- refer to the Supplier Code (ensuring that policies, procedures and suitable training are in place to enable compliance at all times)
- hold your own suppliers and other relevant third parties to equally high standards



# Human rights and labour rights

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Freshfields is committed to upholding human rights, labour rights and fundamental freedoms.

We respect and promote internationally recognised human rights principles and International Labor Organisation (ILO) standards in the way we do business, our own policies and practices, our supply chain engagement and the responsible provision of our legal services.

We oppose and combat (among other matters) all forms of modern slavery and seek to prevent any exploitation, forced and child labour, human trafficking, discrimination and harassment in our business practices and in our supply chains.

We are committed to building a more inclusive workplace and considering a broad pool of suppliers and have set ambitious goals globally that relate to inclusion and wellbeing. We continue to evolve these efforts to ensure we can deliver excellent service to our clients and our people.

**In practice, in the context of our supply chain, this means (among other matters):**

- complying with the UK Modern Slavery Act 2015, the German Supply Chain Duty of Care Act 2021 and other applicable supply chain compliance legislation
- addressing areas of heightened modern slavery risks identified by a supply chain risk assessment carried out by our internal modern slavery advisory group and subsequent detailed due diligence in identified areas
- carrying out appropriate Supplier due diligence, including in relation to human rights and labour rights risks, before entering into contractual arrangements for the provision of goods or services
- engaging with our Suppliers to raise awareness and promote respect for human and labour rights
- treating our Suppliers with respect and dignity
- establishing mechanisms for addressing Suppliers’ grievances, including with regard to human rights violations (see ‘Speaking up’ on page 11)

- proactively considering a broad pool of Suppliers, including supporting small- and medium-sized businesses
- flexing payment terms where appropriate to support small- and medium-sized Suppliers and adhering to agreed-upon payment terms
- reviewing and addressing inclusivity and accessibility matters in the firm’s procurement practices on a continuous basis.

For more information:

- [Our Transparency in Supply Chains statement](#)
- [Our UNGC Communication on Progress](#)





# We expect our Suppliers to:

## Compliance with principles and standards

- respect internationally recognised human rights, including but not limited to those rights set out in the Universal Declaration of Human Rights and ensure their working conditions meet the standards of the International Labour Organisation (ILO), including ILO Convention 138 on the Minimum Age, and Convention 182 on the Elimination of the Worst Forms of Child Labour

## Modern slavery

- comply with all applicable modern slavery (including human trafficking) legislation
- assess which areas of your business and supply chains present relatively greater modern slavery risks, to implement heightened due diligence in these areas, to take steps to mitigate the risks identified, to provide training and awareness to your staff, and to implement suitable modern slavery policies within your organisation

- ensure there is no forced, bonded, or involuntary labour within your own organisation and supply chain, that staff are not required to lodge ‘deposits’ or surrender identity papers, that they are able to leave a role without penalty after giving reasonable notice and that they never ‘pay for a job’ – the cost of their recruitment should be borne by their employer

## Health and safety

- take the necessary steps to ensure a safe, hygienic, and healthy working environment for your staff and those in the immediate vicinity of your operational footprint, in accordance with all local laws and regulatory requirements
- have a documented health and safety management system ensuring adequate arrangements are in place to prevent work-related accidents and ill-health and suitable health and safety training, including in relation to mental wellbeing

## Equality, inclusion and wellbeing

- demonstrate a commitment to equality, inclusion and wellbeing within your own workforce (including fairness in recruitment, retention, training and promotion practices) and supply chain
- maintain policies which seek to eliminate discrimination, including in access to employment opportunities, training and working conditions, on grounds of race or racial group (including colour, nationality and ethnic or national origins); gender (including marital status, gender reassignment/gender identity, pregnancy, maternity, and paternity); sexual orientation; religion or belief; age; disability or neurological difference; political opinion or affiliation and social background or other dimensions of difference
- provide information and data, when requested and where available, on your workforce and initiatives to support inclusion and wellbeing
- collaborate with us and support us in delivering on our inclusion and wellbeing goals
- meet or exceed the requirements of all relevant equalities legislation, support equal pay for equal value and demonstrate that your products and services are accessible and inclusive

## Working conditions

- make it clear that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is not acceptable
- have clearly documented disciplinary and grievance procedures that are communicated to all staff
- respect the right of all staff to form and join a trade union of their choice and use collective bargaining as a constructive forum for addressing working conditions and terms of employment and relations between employers and staff, or their respective organisations
- ensure wages and benefits afforded to staff meet national and local standards and provide staff with clear written information on their pay and conditions in a language they understand. Working hours should comply with relevant national laws.



# Environment

Freshfields shares a responsibility for moving the world onto a more sustainable footing together with our colleagues, clients, business partners and Suppliers.

This means thinking ambitiously about our impact as a firm, putting effective plans in place to move the dial and highlighting our progress transparently for others to see.

Freshfields was one of the first international law firms to offset our emissions in 2007 and, more recently, we have committed to ambitious near-term science-based targets to drive our emissions downwards to net zero in line with the Paris ambition (ie holding the increase in the global average temperature to below 1.5°C above pre-industrial levels).

We share our progress against our science-based targets (2018/19 baseline) and wider environmental targets publicly.

**In practice, in the context of our supply chain, this means:**

- using environmental sustainability criteria in Supplier selection, e.g. performance with respect to carbon, use of environmentally sensitive

commodities and materials, waste strategy and the quality of associated policy, leadership and governance

- ensuring 62 per cent or more of our Suppliers (by emissions) have adopted science-based targets on carbon emissions by 2027
- ensuring that our Suppliers are at a minimum aligned with our environmental targets, if not actively helping us achieve them

## For more information:

- [Our Transparency in Supply Chains statement](#)
- [Our Carbon Footprint assurance statement](#)
- [Our UNGC Communication on Progress](#)
- [Freshfields’ environmental priorities](#)

## We expect our Suppliers to:

- comply with all applicable environmental laws, regulations and standards
- commit to science-based targets on carbon emissions by 2027 and ideally also to a long-term net zero plan
- measure and report your carbon footprint (at a minimum Scope 1 and 2 emissions) and disclose this publicly (eg through CDP) or share with us directly
- disclose your environmental performance using recognised scoring systems or standards (eg EcoVadis, CDP, ISSB, GRI)
- implement and demonstrate environmental policies and management systems to drive continuous improvement, enhanced responsibility and mitigate adverse risks
- help us understand how you are creatively adding value to our environmental ambition – for example, through the elimination of waste associated with the product(s) or service(s) you provide





# Anti-corruption and business integrity

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Freshfields is committed to the highest standards of professional and financial integrity.

Our success depends upon our reputation, and we are firmly committed to doing the right thing.

**In practice, in the context of our supply chain, this means:**

- complying with applicable laws and regulations governing our own business operations and supply chain activities
- conducting our business with fairness, integrity and honesty
- implementing fair and transparent procurement practices, including around Supplier selection, evaluation and contract negotiation
- a zero tolerance approach to bribery and corruption, improper influence, money-laundering, insider trading, insider tipping and market abuse, fraud, tax evasion and anti-competitive behaviour

- protecting the confidentiality of information and protecting personal data entrusted to us (including by our Suppliers), as far as is legally possible and in line with our professional and legal obligations
- holding ourselves accountable for upholding the standards set out in the Freshfields Code and this Supplier Code, and taking appropriate action in cases of non-compliance, including corrective measures and termination of Supplier relationships where necessary

For more information:

[Our UNGC Communication on Progress](#)





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# We expect our Suppliers to:

## Transparency and accountability

- promote transparency and accountability in the conduct and administration of your business

## Professional and financial integrity

- avoid any actual or apparent conflicts of interest and not use any information and/or resources for improper gains
- not engage in any form of, and maintain policies, management systems and practices to prevent all forms of, bribery and corruption, improper influence, money-laundering, insider trading, insider tipping and market abuse, conflicts of interest, fraud, tax evasion, anticompetitive behaviour and other similar unethical practices

## Confidentiality, data privacy and information security

- use personal data responsibly and fairly and, at all times, in accordance with applicable laws and regulations
- protect confidential information of Freshfields and everyone we do business with (including clients, customers, Suppliers and other third parties). If your products or services include receipt/handling of our data or our clients' data, data stewardship is particularly important
- respect intellectual property rights and be ethical and transparent with us regarding any use of AI in your own products and services
- maintain appropriate internal policies and procedures regarding confidentiality and information security that address people (eg background checks), processes and technology

- maintain security controls, proportionate to relevant risks, in support of those policies and procedures
- have necessary controls in place to detect security anomalies, as well as plans that define appropriate activities to respond to security incidents and events and to recover from them
- notify us immediately if any security anomaly or security incident or event is connected to us, any of our information or our clients' information
- secure independent accreditation and assurance that appropriate security controls are in place



# Speaking up

Freshfields actively encourages our people, our Suppliers and other external (affected) stakeholders to speak up.

We understand and emphasise the importance of speaking-up and of our people and third parties flagging anything that does not look or feel right and of swiftly and securely passing on complaints or concerns.

**In practice this means:**

- maintaining an internal whistleblowing policy that encourages anyone who suspects wrongdoing to report it as soon as possible, in the knowledge that concerns will be dealt with confidentially, taken seriously and investigated as appropriate. The policy also covers the protection of whistleblowers from any form of retaliation
- providing alternative channels for raising concerns and complaints, by email (see [Complaints](#)) or the Freshfields [Global Speak-up Hotline](#) (run by an independent service provider). The Speak-Up hotline is available to Freshfields’ staff, Suppliers, contractors, clients and other third parties globally and allows reporting in English and other languages

Reports to the hotline can be made online or by phone and on an anonymous basis without fear of adverse reactions, even if the suspicion turns out to be mistaken. Concerns will be taken seriously and investigated sensitively and appropriately. Retaliation or victimisation against anyone raising concerns in good faith will not be tolerated.

## For more information:

[Freshfields Global Speak-up Hotline](#)  
[Complaints](#)

## We expect our Suppliers to:

- enable your staff to raise concerns, including in relation to suspected wrongdoing
- ensure that you communicate the availability of the Freshfields Speak-Up hotline appropriately
- collaborate fully, promptly and transparently if asked for input into any investigations of concerns or complaints, and cooperate with us on their remediation where relevant
- ask your own Suppliers to set up and promote similar processes to raise concerns





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