



UN Global Compact

Communication of Progress 2021

Contents

Section	Page
Statement of Continued Support	3
Our Purpose	4
Human Rights	5-6
Labour	7-9
Environmental	10
Anti-Corruption	11

•clarkslegal The Diverse Law Firm

H.E. António Guterres
Secretary-General
United Nations
New York, NY 10017
USA

Our Ref	MAS
Direct Dial No	+44 118 958 5321
Direct e-mail	msippitt@clarkslegal.com
Date	29 January 2021

Dear Mr Secretary-General

I am pleased to confirm that Clarkslegal LLP and its subsidiaries are in support of the Ten Principles of the United Nations Global Compact (UNGC) in the areas of Human Rights, Labour, Environment and Anti-Corruption. The Ten Principles are part of our ongoing long-term strategy and are embedded in our operational practices. In addition to this, we are working in collaboration with our partners to uphold the value of the Ten Principles, as well as contribute more broadly to the achievement of the Sustainable Development Goals.

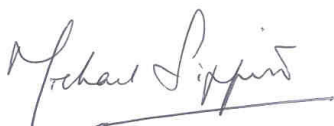
As a sign of our continued commitment to the UNGC and its Ten Principles, we acknowledge that we need to submit a Communication of Progress (COP), which includes the following:

- Statement of continued support from our Chairman (as per this letter).
- Communication of Progress Statement, which highlights how the company has implemented the Ten Principles to date and how it intends to further progress their implementation in the future.
- How the outcome of the implemented principles has been measured (in a qualitative or quantitative manner).

The Statement of continuous support to the UNGC Ten Principles is available on our website, so that our commitment to upholding human and labour rights, environmental and ethical practices is visible to our employees, partners, contractors and suppliers. This document is also provided to any interested party on request.

The Statement of continuous support is updated every year and this process is aligned with our submission of the COP to the UNGC.

Yours faithfully



MICHAEL SIPPITT
CHAIRMAN
For Clarkslegal LLP

Our Purpose

At Clarkslegal, being a socially responsible business is embedded in our culture and remains key to working with clients who value what we do. However, the environment in which we operate has changed dramatically. We worked hard to adapt to this new environment and continue to speak out on issues that impact our clients, our people and our industry.

Clarkslegal has a widespread reputation as one of the most innovative firms in the market. Not only do we utilise a range of top level technology platforms to help us provide an ever more efficient and streamlined service to clients, we are also regularly at the forefront of developments in the legal market.

We have been able to create an inclusive culture in the firm and all our people take responsibility for delivering exceptional client service and making this a firm we can all be proud to work for. One where we're all looking forward with confidence. Therefore, I am pleased to confirm that Clarkslegal supports and actively promotes the adoption of The Ten Principles of the United Nations Global Compact (UNGC) with respect to human rights, labour, environment and anti-corruption.

Human Rights

Clarkslegal is supporting and upholding principles held within the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We are a law firm, with subsidiaries having a range of activities incorporating advice on setting up a business in the UK, investment opportunities for start-ups, as well as facilitating relevant connections to companies providing sustainable technologies, to encourage trade and investment in the Commonwealth. Not only do we uphold the rule of law in the UK (where our jurisdiction lies), but we also help our partners achieve the same goal (by using our network of trusted contacts, regardless of their location).

We are addressing relevant human rights issues in a variety of ways, such as enacting relevant internal policies and engaging with communities.

Our Staff

We have a range of internal policies / documents, which highlight how we incorporate human rights principles into our operations. A sample of these policies can be found below:

- Recruitment and Retention Policy
- Equality, Diversity, Equal Opportunities and Anti-Harassment Policy
- Grievance Policy
- Whistleblowing Policy
- Disability Policy
- Flexible Working Policy
- Holiday Sickness and Absence Policy

Regarding the implementation of our policies, one example is the Recruitment and Retention Policy and how this is implemented and monitored.

The objective of the Recruitment & Retention Policy is to promote and establish a consistent, professional procedure for the recruitment of staff. The recruitment and selection decision ensures the best possible person-to-job fit which in turn, contribute significantly towards our organisation's effectiveness.

This policy ensures our Recruitment and

Selection Policy is fair and consistent, non-discriminatory and conforms to all statutory regulations and agreed best practices. The policy clearly outlines responsibilities for the HR Manager and Partners, as well as the Contracting Agencies which may aid on recruitment.

All new employees will have Induction Training. The first stage induction process is conducted by our Human Resources (HR) Manager and includes an Equal Opportunities summary / health & safety basics / office procedures / personal and bank details / organisation's structure and who's who. The second stage induction process is the responsibility of the appointing Work Group and will cover individual job responsibilities, client care and additional training requirements.

New employee follow-up is conducted by the HR Manager (verbally or by email) at 1, 2, 3 and 6 months to check the new recruit is settling in to the Work Group and the organisation. Sign off by HR Manager and employee on Induction Programme and retained on file.

After successful completion of the assessment period, the last review meeting will be taken as the first annual performance appraisal. The employee will then be placed onto the current

scheme and be reviewed every year, in line with the career portfolio.

The Contract of Employment of each employee includes terms and conditions of employment, including details of place of work, remuneration, hours of work, holiday entitlement and termination causes.

Regarding pay, we can confirm that all our employees are paid at least minimum legal wage in the country in which we operate.

Our Contractors and Suppliers

Regarding our contractors and suppliers, where we can, we apply terms of business when we enter a business relationship. These include provisions regarding ethical business practices, in full accord with professional obligations on qualified solicitors. To date, we can confirm that no unethical behaviour of our staff, contractors or suppliers has been brought to our attention.

Our Community

Our work with the community has taken place for many years, highlighting our commitment to make an impact in the lives of others. We have a Community and Social Responsibility Policy, which includes the below.

Clarkslegal is committed to supporting established charities chosen by its staff. A Charity Committee oversees the selection of the chosen charities and helps organise staff fundraising and provision of other support to the charities. Each office is invited every year to nominate charities for the coming year and then votes on a shortlist. There is little direct input or instruction from the Partnership thereby furthering the organisation's ethos of facilitating a staff led and run committee whilst providing central support where requested.

The charity committee were able to overcome the challenges of 2020, through fundraising

activities such as online quizzes and lockdown fitness challenges. The fitness challenges whether walking, running or cycling were encouraged to also help with employee wellbeing.

This year (2021) our two nominated charities are:

New Beginnings



www.newbeginningsreading.org

FareShare



www.fareshare.org.uk

Labour

Clarkslegal is committed to upholding the UN Global Compact Principles in relation to Labour. The firm is dedicated to ensuring that all labour standards are an active component of our people's daily working environment and experience and implement policies and practices that encourage the adoption of such standards.

Our staff

We have a number of relevant policies, which include the previously highlighted ones, as well as the below:

- Equality and Diversity, Equal Opportunities and Anti-Harassment
- Health & Safety & Staff Welfare Policy
- Grievance Policy
- Whistleblowing Policy

For illustration of how we approach equality, diversity and equal opportunities internally, we do this through our Equality, Diversity, Equal Opportunities and Anti-Harassment Policy and the Health, Safety and Welfare Policy.

Equality, Diversity, Equal Opportunities and Anti-Harassment Policy

Our organisation is committed to the promotion of equality and diversity and the avoidance of discrimination across employment, partnership, recruitment and selection, training, conditions of service and promotions.

Our organisation is committed to providing equal opportunities in employment. This means that all job applicants, employees, workers and partners, regardless of race, colour, disability, pregnancy or maternity, age, ethnic or national origins, gender, gender reassignment, marital or civil partnership status, sexual orientation or beliefs protected by the law ("beliefs") ("the Protected Characteristics") will be treated equally and lawfully. Decisions regarding recruitment, employment opportunities and

promotion will be based on qualifications and merit. We will not discriminate unlawfully on grounds of disability. We are also committed to eliminating discrimination in our dealings with other solicitors, barristers, clients and third parties and this policy will apply to such professional dealings.

All staff are given equal opportunities and anti-harassment training on induction. Follow-up training is provided by means of ad hoc seminars, emails or one-to-one mentoring (if appropriate).

General training opportunities, promotion and career development within the organisation will be available to all employees on an equal basis, as appropriate to their experience and abilities. Equal opportunity training is made available on an ongoing basis.

Health & Safety & Staff Welfare Policy

There are specific provisions for visual display usage, as well as other information relevant to work conducted on our premises or at working from home, which could be a risk to the health, safety of welfare of our employees.

In 2020, all staff were required to work from home due to the pandemic. Home risk assessments were carried out to check whether the proposed home workspace and computer were suitable for the tasks the homeworker would be carrying out. The Firm is responsible for the equipment it supplies employees and employees are responsible to inform of any flaws highlighted by the assessment. Once the workspace is passed as safe it is the

responsibility of the homeworker is to keep it that way and take reasonable care of their health and safety.

In accordance with our Health and Safety obligations, we provide Medicash Proactive Cash Plan as a health benefit to all employees. The benefit provides a number of cash back reimbursements that can be claimed directly by employees for many types of health costs incurred outside of work such as dental, optical and physiotherapy costs. In addition, each employee benefits from an Employee Assistance Program (direct access to qualified counsellors), a Virtual GP service, discounts on gym memberships and access to a Retail Discount Scheme (for discounted cinema tickets, holiday savings and e-codes). The policy also includes provisions for driving cars, the prohibition of mobile phones usage when driving, and general welfare matters.

We have a legal duty to take reasonable care to ensure that health of our staff is not put at risk by excessive pressures or demands arising from the way work is organised. This policy takes account of our obligations under the Health and Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999, Employment Rights Act 1996, Protection from Harassment Act 1997, Working Time Regulations 1998 and Equality Act 2010.

Solicitors' offices are not usually dangerous places, but we bear in mind that any building has opportunities for danger and accidents. The purpose of this statement is to outline the organisation's policy in respect of these matters, the organisation for carrying out that policy and the arrangements which we have made to make our offices as safe and healthy as possible.

It is and always has been the policy of the organisation to provide and maintain the healthiest and safest possible working conditions and in particular that:

- our offices are maintained to a high standard and if any repair is necessary which might make our premises unsafe it should be carried out immediately;
- all machinery and equipment should be kept in good working order and used and stored in such a way that does not cause danger, and that flexes and wires should not be allowed to trail where they might be tripped over;
- our landlords are responsible for ensuring that the staircases and other common areas are kept clean, properly lighted and free from obstruction;
- adequate kick steps and small step ladders be provided to avoid the necessity of standing on chairs, especially swivel chairs, to reach the top of cupboards;
- a healthy working environment is maintained, e.g. by not allowing smoking (including use of e-cigarettes) in the workplace or during working hours and by ensuring that no hazardous substances are used (any low-risk chemicals that are required, e.g. for cleaning, are not stored within the offices);
- we give ready consideration to any other matters affecting health and safety.

All employees are aware of the policy (communicated during induction and on the Intranet) and endeavour to ensure these objectives are achieved.

The Finance Controller has overall responsibility for Health and Safety with the assistance of the Facilities Assistant. The IT Team are responsible for organising the day-to-day maintenance of computer and related equipment. The Facilities Assistant is responsible for facilities and related equipment and ensuring that statutory notices are displayed and information available. A list of qualified First Aiders is placed in all kitchen areas.

If an accident occurs, it should be notified to a First Aider or 'Appointed Person' immediately.

They will ensure appropriate action is taken (and the Accident and Incident Record is updated) and call an ambulance if necessary. A colleague will accompany the person to hospital if required and next of kin will be notified. The HR Partner or Managing Partner should also be notified as they can give guidance on each incident.

Our Clients & Community

Due to our scope of work, we advise on any aspect of employment law in our jurisdiction. For example, we have specific services which cater to modern slavery prevention (which include mitigation measures to prevent forced, compulsory and child labour, discriminatory working practices and encourage freedom of association). Our aim is to raise awareness of this topic externally and we therefore participate (as speakers) at minimum 4 events per year (focus on modern slavery), in order to raise awareness of the topic.

International

Each year, we provide counsel on business and human rights as an integral part of the UK Employers' delegation, led by the Confederation of British Industry (CBI), to the International Labour Organisation (ILO). This year, one of our solicitors is supporting the CBI at the 109th Session of the International Labour Conference, 7-18 June 2021, in matters including the fundamental principles and rights at work and will be the UK employer spokesperson in the ILO committee on the application of labour standards.

Our aim is to constantly ensure we understand the international context and how the ILO is developing the agenda regarding conventions to which countries have signed up, as well as employers' responsibilities in complying with these conventions.

Environmental

Continual improvement forms part of our approach in order that we can achieve an overall positive environmental impact as a result of the way we do business. We wholeheartedly support the UN Global Compact Environment Principles and are committed to the protection of the world around us, including playing our part in limiting global warming, preventing pollution and minimising our environmental impacts.

Our Staff

We have an Environmental and Sustainability Policy, which highlights our commitment to achieving environmental best practice through our business activities by:

- Conducting all our operations in an environmentally responsible and sustainable manner.
- Complying with relevant environmental legislation, professional codes of practice and standards.
- Ensuring that staff understand and are accountable to these policy goals through communication and training.
- Encouraging feedback from our staff on environmental and sustainability issues.
- Monitoring and reducing the environmental impacts of energy and resource use in our offices.
- Incorporating environmental factors into our procurement decisions.
- Use suppliers who are seeking to reduce their environmental impacts.
- Encouraging staff to walk or travel by public transport if possible and reducing the need for travel where possible.
- Working with our Landlords agents to minimise environmental impacts for costs/activities which are not directly within our control.

We have achieved this by implementing a range of measures to prevent environmental impacts in the first place. We are encouraging our staff to not print documents, unless necessary, but due to our specific activities printing cannot always be avoided. All paper that we use for printing it is recyclable and all our paper waste is recycled through

partner organisations. To avoid air pollution, we encourage our staff to travel to work by train, as well as employing audio and video conferencing. Our toner cartridges are recycled, and our computers are donated to a charity for reuse or are recycled as per legislative requirements (WEEE Regulations). We segregate our waste internally and recycle specific waste streams, which are subsequently removed by the building maintenance services.

Our permanent aim is to continually reduce the environmental impacts of our business. We are achieving this by regularly reviewing the costs of our operations and taking appropriate measures. Our Reading office is BREAAAM rated and our London office has an Energy Performance Asset Rating of 85.

International

Forbury Investment Network is the operating arm of the Commonwealth Environmental Investment Platform (CEIP). CEIP is promoting trade and investment in sustainable technologies in the Commonwealth. We have several CEIP Associates, SME organisations which provide sustainable technologies, for which we constantly make relevant business introductions, to facilitate trade within the Commonwealth. This leads to value creation not just for our CEIP Associates, but also to the communities in which these technologies are implemented, ensuring that a sustainable local eco-system is created. We are constantly tracking progress of successful introductions, so that we can report on developments when needed / required. This programme is sponsored and supported by Clarkslegal, for benefit in particular to developing countries.

Anti-Corruption

Clarkslegal does not tolerate any forms of corruption, either by our people or others who are associated with us. Compliance with our Anti-Bribery and Corruption Policy is mandatory for all of our people. We expect our Third Parties to comply with relevant laws relating to bribery and corruption in accordance with our Third Party Code of Conduct. The firm is fully committed to upholding the tenth UN Global Compact Principle of Anti-corruption.

Our Staff

With regards to Anti-Corruption, we have internal policies specifically designed to tackle this issue:

- Anti-Bribery Policy
- Money Laundering and Terrorist Financing Risk Assessment Policy
- Money Laundering and Terrorist Financing Staff Training
- Whistleblowing Policy

All our policies include specific definitions for cases of bribery and how these can be prevented, including the bribery of a foreign official, suppliers (we perform a due diligence check on our suppliers), hospitality and entertainment and facilitation payments. Any breach of this policy may lead to disciplinary action, which could result in dismissal for gross misconduct (included within Disciplinary & Dismissal Policy). Any instruction to cover up wrongdoing is also a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a Partner, the employee should not agree to remain silent.

The Money Laundering and Terrorist Financing Risk Assessment Policy includes details relevant to the risk assessment undertaken by the company with regards to areas of risk. Specific processes have been designed and we also have a Money Laundering Reporting Officer.

We also have a Money Laundering and Terrorist Financing Training Policy. This policy records the training to be provided to staff on money laundering, terrorist financing and client due diligence matters. As part of the organisation's

induction programme, all new fee earners and all new members of the accounts team will be required to complete the on-line training programme and the test to be completed at the end of this training. The on-line training lasts approximately one hour, and the quiz takes approximately 15 minutes to complete. On completion of this training, a specially designated member of staff must be notified by email, so that the training record is updated.

Any concerns regarding bribery, corruption, money laundering, environmental and health and safety incidents, negligence, etc, can be reported using our Whistleblowing Policy. There is a specific process in place, which refers to any matter being raised with the direct line of reporting. If this is not possible or the matter has been dealt with ineffectively, it can be escalated to the Compliance Officer for Finance and Administration (COFA). All efforts to maintain confidentiality of the matter will be made. There is an investigation procedure in place and the outcome of the investigation is communicated to the relevant party. In case the outcome is not acceptable, it can be further escalated to the higher ranks in the organisation.

