

[COMPANY NAME] Business Ethics Policy

[Date] | Private & Confidential





[COMPANY NAME] – Business Ethics Policy

1. POLICY PURPOSE

- 1.1 The purpose of this policy is to emphasise [COMPANY NAME]'s (the "**Company**") commitment towards its compliance with business ethics.
- 1.2 This policy applies to:
 - 1.2.1 the Company; and
 - 1.2.2 all directors, partners, employees and independent consultants of the Company.
- 1.3 This policy will be reviewed and updated bi-annually, or from time to time as deemed appropriate.
- 1.4 If you have any questions on this Policy, please contact [NAME], [Title], at [\[EMAIL\]](#).

2. DEALING WITH CLIENTS

- 2.1 Uncompromising on Quality
 - 2.1.1 the Company recognises that its reputation rests on the quality of its people, advice and service.
 - 2.1.2 the Company commits to assigning the right people to each matter, as well as giving them clear and sufficient instructions and supervision so they do the right things in discharging their work.
- 2.2 Shared Knowledge
 - 2.2.1 the Company recognises that shared legal, practical and market-related knowledge is more powerful than individual knowledge.
 - 2.2.2 The personnel of the Company are expected to call on the knowledge of others when issues are beyond their experience, knowledge or jurisdiction, and to use shared know-how responsibly.
- 2.3 Client/Matter Acceptance
 - 2.3.1 the Company recognises that it is known by the company that it keeps. In this regard:
 - (a) the Company understands that it has the legal and professional obligations to know its clients, and to refuse to do business with those whose activities violate the law or whose source of funds is suspect.
 - (b) the Company is expected to conduct client due diligence before beginning work.
 - (c) the Company is required to provide a firm-approved letter of engagement to each new client and a purchase order to existing clients before starting work on a new matter.
 - 2.3.2 the Company also recognises that it has professional ethical obligations to avoid conflicts of interest in its representation of clients and to notify clients quickly if a conflict should arise.
- 2.4 Money Laundering Prevention
 - 2.4.1 The Company's policy is to conduct business only with reputable clients involved in legitimate business activities using funds derived from legitimate sources.



- 2.4.2 The Company is committed to complying with all anti-money laundering and anti-terrorism laws. It does not participate in, or help clients participate in, money-laundering activities.
- 2.4.3 This means that the Company is committed to taking all measures necessary to ensure that it does not by itself, and does not help others, conceal the sources of money to avoid disclosing its sources, uses, or paying taxes.
- 2.4.4 The Company is committed to taking all measures necessary to ensure that it does not participate in or facilitate transactions that involve proceeds that it knows or suspects are from criminal activities, such as terrorism, narcotics, tax evasion or fraud.
- 2.4.5 The Company is also committed to taking all measures necessary to ensure that it does not help others use funds to finance terrorist activities.

3. DEALING WITH OTHERS

3.1 Avoiding Conflicts of Interest

- 3.1.1 the Company is committed to ensuring that it avoids any investment, interest or association that interferes, or might interfere, with the independent exercise of its judgment and the performance of its duties.
- 3.1.2 With respect to suppliers, this means:
 - (a) the Company will avoid actual or apparent conflicts with its interests.
 - (b) the Company will deal with all suppliers doing business with it in a fair and objective manner without favour or preference based upon personal financial or relationship considerations.

3.2 Compliance with Anti-Corruption Laws

- 3.2.1 As a global enterprise, the Company must comply with a variety of anti-corruption laws.
- 3.2.2 These laws apply to its interactions with governments and government officials. They also cover its dealings with clients and suppliers, as well as the dealings of third parties acting on its behalf.
- 3.2.3 The Company recognises that its lawyers, its employees and its clients have important obligations under various anti-bribery and anti-corruption laws.
- 3.2.4 The Company has developed the following simplified guidance to assist its personnel in complying with this policy:
 - (a) The Company expects and requires that personnel will not bribe nor accept bribes from anyone. Bribery is offering, giving, asking for or receiving anything with the intent of getting the recipient to do something improper.
 - (b) A bribe can be anything which is given to get someone to do something wrong, or in respect of public officials, to influence them in a manner that provides the Company (or its clients) with business advantages.
 - (c) Personnel of the Company should not violate or knowingly permit anyone to violate this prohibition on bribery, or any applicable anti-corruption laws in performing work for the Company.



4. DEALING WITH COMPETITORS

4.1 The Company is committed to competing fairly and with integrity – solely on the basis of the quality of its people, advice and service; never on the basis of unfair practices.

4.2 This entails:

4.2.1 not making misleading or disparaging statements about its competitors; and

4.2.2 strictly complying with anti-competition laws, which generally forbid discussing or entering into formal or informal agreements regarding activities that may restrain trade.

5. FINANCIAL AND OTHER INFORMATION

5.1 Accuracy of Financial and Other Information

5.1.1 The Company recognises that the records that its personnel create as part of their daily responsibilities have a significant impact on its financial information.

5.1.2 The Company is committed to ensuring that any information that its personnel enter into its business records are entered in a truthful, accurate, complete, legible and timely manner.

5.1.3 Such information can include time records, expenses, receipts, client records, and regulatory or other financial reports.

5.1.4 The Company is aware that the consequences for falsifying financial records are severe, including potential criminal prosecution for the individuals involved, and will ensure that its personnel are aware of such consequences.

5.2 Protecting Confidential Information

5.2.1 The Company recognises that during the course of business it may be privy to confidential information.

5.2.2 In this regard, the Company commits to complying with its obligations of confidentiality.

5.2.3 This means:

(a) The fact that any client has sought the Company's services or asked the Company to pitch for work is as confidential as the services itself.

(b) The Company acknowledges that it must not disclose, even inadvertently, the identity of clients, former clients and prospective clients unless it has their consent to do so.

(c) The Company is expected to ensure that its personnel are familiar with and follow security measures and internal control procedures for the use of its network, systems, applications and equipment.

(d) The Company is expected to carefully protect all relevant devices in places where they could be lost or stolen, not share passwords or access codes, and not allow others to use its accounts or devices.

(e) The Company is expected to ensure that its personnel use caution when discussing sensitive information on a cell phone or with a co-worker in public places.

- (f) The Company is committed to ensuring that its personnel are careful not to leave documents containing sensitive information where an unauthorised person might read them, including unattended desks or on copy machines.

5.2.4 In addition, the Company is committed to ensuring that its personnel do not use any confidential information, or any other information derived from clients, to engage in insider trading.

5.3 Privacy and Personal Information

5.3.1 The Company is committed to handling personal data responsibly and in compliance with all applicable laws.

5.3.2 Personal data includes, among other things, any data that could be used to identify or locate individuals, such as names, dates and places of birth, addresses, email addresses, social security, driver's licenses or other government identification numbers, social media accounts, and data linked to such identifiers, etc.

5.3.3 This means that the Company commits to:

- (a) understanding and adhering to the privacy laws and regulations that apply to any personal data in the jurisdictions where it is collected, processed or used;
- (b) making others aware of, and ensuring compliance with, the privacy policies required by clients, suppliers and others whose data it uses, processes or has access to;
- (c) collecting and using personal data only for appropriate business purposes;
- (d) using "anonymous" data (i.e. with names removed and not identifiable) or "aggregated" data (i.e. summarised so as not to be identifiable to an individual) where feasible;
- (e) limiting access to personal data to individuals who need it for legitimate business purposes; and
- (f) using care to prevent unauthorised access in processing personal data or accidental loss of personal data.

5.4 Document and Records Retention

5.4.1 The Company is expected to maintain all records in accordance with the legal and business requirements appropriate to its profession.

5.4.2 To preserve the integrity of the record-keeping and reporting systems, the Company commits to ensuring that all its partners and staff know and comply with all applicable local records, retention policies and procedures.

6. TECHNOLOGY AND COMMUNICATIONS

6.1 Using Information Systems

6.1.1 The Company commits to ensuring that its information systems are not used to engage in prohibited conduct, such as communicating or viewing discriminatory, harassing, sexually explicit or otherwise offensive or inappropriate material.

6.1.2 The Company is committed to ensuring that its information systems may not be used to download entertainment software, play games over the internet, or download unlicensed images, music or videos, or to store music or videos other than those appropriately licensed for personal use and used accordingly.



6.1.3 In addition, the IT systems of the Company may not be used to engage in any other activities that involve unlawful and unauthorized distribution of content online or which may violate intellectual property rights.

6.2 Using Social Media

6.2.1 The Company does not generally restrict access to social media sites.

6.2.2 However, the Company recognises that it has substantial legal and ethical responsibilities that must be observed when using social media.

6.2.3 These include obligations to protect the privacy, confidentiality and legal interests of its clients.

6.3 Dealing with the News Media

6.3.1 Media relations are an important part of building awareness of the capabilities and strengths of the Company.

6.3.2 They are a key component of enhancing and protecting its reputation. However, dealing with the news media is not without risk.

6.3.3 Accordingly, it is important that the Company approaches media relations with care.

6.3.4 The Company commits to ensuring that its personnel do not make any false representations to the media.

6.4 Advertising and Marketing

6.4.1 The Company commits to ensuring that its personnel advertise fairly, honestly and accurately.

6.4.2 In this regard, the Company commits to ensuring that its personnel do not make any false or misleading claims whilst advertising or marketing its services.