

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

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07 May 2019

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.

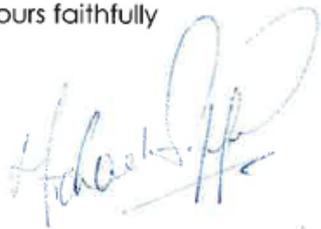
As a sign of our continued commitment to the UNGC and its Ten Principles, we acknowledge that we need to submit a Communication of Progress (COP), which includes the following:

- Statement of continued support from our Chairman (as per this document).
- 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 SIPPIT
CHAIRMAN
For Clarkslegal LLP

Clarkslegal LLP

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Human Rights

Clarkslegal LLP 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 of which we are a part of.

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 are able to, 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.

This year (2019) our nominated charities are:

- Bloodwise - www.bloodwise.org.uk
- FareShare - www.fareshare.org.uk

The committee aims to undertake one larger fundraising event each year whilst maintaining frequent small-scale events i.e. dress down days, quiz nights, raffles etc. Over the last year, we have organised two afternoon teas for elderly people who live on their own.

Labour Principles

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, which could be a risk to the health, safety of welfare of our employees.

In accordance with our Health and Safety obligations, we participate in a voucher scheme with Specsavers which provides employees with a free eye sight test every 2 years and, if the Specsavers optician prescribes them for VDU use, the basic cost of glasses. The policy also

includes provisions for driving cars, the prohibition of mobile phones usage when driving, as well as home working 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 will all be 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 labour standards including modern slavery), in order to raise awareness of the topic.

International

We annually represent the UK Employer Ethics and Human Rights Delegation led by the Confederation of British Industry (CBI) at the International Labour Organisation (ILO). This year, one of our solicitors is representing CBI at the 107th Session of the International Labour Conference, 28 May-8 June 2018. 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 to, as well as how they comply with these conventions.

Environmental Principles

Our Staff

Being mostly office based, the nature of the operations makes the direct environmental impact of our operations relatively small. There are specific actions which we have taken internally, to prevent and minimise such an impact.

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 travel by public transport and reducing the need for travel where possible (our new office is deliberately close to rail transport connections).
- Communicating the policy as appropriate to our clients and suppliers.
- 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's recyclable and all our paper waste is recycled through partner organisations. In order 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. We have recently moved one of our offices into a more modern building, which is BREAAAM rated and considered the energy efficiency of our future offices prior to the decision to move office.

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 representatives in other countries and also collaborate with some 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 contacts, 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.

Related to CEIP, we have supported on a pro bono basis the establishment and operation of the Bangladesh UK Environmental Foundation, which exists to support sustainable projects in Bangladesh.

Anti-Corruption Principles

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.