

SHOOSMITHS LLP COMMUNICATION ON PROGRESS FOR UN GLOBAL COMPACT

January 2017



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1. Introduction to the United Nations Global Compact

The United Nations Global Compact was launched in 2000 and is a call to companies to align strategies and operations with universal principles in the areas of human rights, labour, environment and anti-corruption and to undertake actions that advance societal goals.

The Global Compact has become the world's largest global corporate citizenship initiative and although it is voluntary has credence because membership requires transparency and disclosure and external scrutiny. Signatories commit to and provide an annual report on progress, called a Communication on Progress, providing the opportunity for chief executives to re-commit to the ten principles and to report on progress and plans.

United Nations Global Compact Principles

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights and;

Principle 2: Make sure they are not complicit in any human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination of all forms of forced and compulsory labour;

Principle 5: The effective abolition of child labour; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should adopt a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.



Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.



2. Chief Executive and Chairman Statement of Support

Welcome to our first annual Communication on Progress (COP) and re-affirmation that Shoosmiths LLP is a signatory of the United Nations Global Compact and continues to support the 10 principles related to Human Rights, Labour, Environment and Anti-Corruption.

Approval by the Shoosmiths Operations Board to become a signatory in January 2016, our recent review of how we can support the 2030 Agenda for Sustainable Development and the 17 Sustainable Development Goals and on 18 January 2017 approval of this COP are timely reminders that business is key to tackling many human rights, labour, environment and anti-corruption challenges faced every day by society. Our practice groups and directorates heads recognise the leadership role they play in ensuring the Global Compact and its principles are considered across the firm as part of our strategy and that they are sufficiently embedded in our culture and our operational planning, controls and procedures such that we can demonstrate and report on progress.

This statement is accessible through the UN Global Compact website, the Shoosmiths website and is communicated to our key stakeholders including partners and staff, clients and our local communities.





Claire Rowe
Chief Executive

Peter Duff Chairman

3. Introduction to Shoosmiths and our approach to responsible business

Shoosmiths LLP is a leading national law firm. As at 2 January 2017 we had 169 partners and partner equivalents and 1,557 personnel working together as one team at 12 locations in England, Scotland and Northern Ireland namely Basingstoke, Belfast, Birmingham, Edinburgh, Leeds, London, Manchester, Milton Keynes, Northampton, Nottingham, Southampton and Thames Valley.

We have been delivering legal services to businesses since 1845. Clients include household name blue chip companies, leading financial institutions, public and private sector organisations and foreign owned corporates. The Private Client Practice Group, Access Legal, provides legal services to some equally blue chip individuals and their families.

We are accredited to the ISO 9001 quality standard and were the first top 100 law firm to achieve Gold Standard Investors in People status. We are a member of the World Services Group whose members operate in more than 145 jurisdictions and an Equal Opportunities Employer.

Our vision to be the leading national law firm famous for its superb client experience is underpinned by our Corporate Responsibility aspiration to be the leading national law firm famous for its positive contribution to society.

The Shoosmiths approach to corporate responsibility (CR) is based on our desire to *Shine: Bright Ideas for Positive Change*. Our ability to achieve an overall positive impact on society is determined not just by specific societal aspirations within our business planning cycle but also by our wider goals and the procedures we follow to run our business.

We use our annual CR reports to track and report progress against our objectives and targets, to share with our internal and external stakeholders our approach and as a means of informing everyone at Shoosmiths that responsible business behaviours enable us to improve our performance in our marketplace, our workplace, our environment and our community.

This commitment to responsible business practice informed our decision to become a signatory of the United Nations Global Compact in January 2016 and to support its ten principles relating to human rights, labour, environment and anti-corruption. We became a member of the United Nations Global Compact UK in May 2016. Thinking to the future the 2015 United Nations Sustainable Development Goals will also help us to shape our plans for 2016/2017 and beyond.

Our new business plan was defined during the year to reflect our priorities for the 2016/2019 period and will build on our existing success – great people, clients and locations to achieve further growth across our five practice groups.

We will deliver our vision by:

- A reputation for quality and a great client experience;
- Staying close to our clients, anticipating their needs and delivering collaborative solutions to their legal requirements;
- Showing strength in our diversity and being an employer of choice by offering a rewarding and opportunity filled environment for all our people; and
- A strong national presence through our network of offices.

Operating to the highest standards of business integrity governs our approach.

To deliver *Shine: Bright Ideas for Positive Change* we provide the necessary tools and guidance to enable colleagues to think and say 'this is how I shine. This is how I made a difference.'

We will achieve our CR strategy by setting and reviewing targets in four work programmes:

Our marketplace	Our environment
Work collaboratively in the marketplace with	Demonstrating high standards of
our clients and suppliers to evidence best	environmental responsibility in all our
corporate responsibility practice aligned	operations and minimising the
with our vision to be the leading national	environmental impacts associated with our
law firm famous for its superb client	activities, products and services.
experience.	
Our workplace	Our communities
Attracting, developing and retaining the	Building and maintaining sustainable
best talent for reinforcing our values and	community relationships.
providing a stimulating and rewarding work	
environment.	

As a signatory of the United Nations Global Compact we have communicated the movement's principles and work including via our website, twitter, our CR blog SHOUTback and at a workshop jointly held with Business in the Community December 2016 where we offered advice to charities on how to get the best from business relationships with corporates.

This, our first annual Communication on Progress, covers the period January 2016 to January 2017 (although some of our data cited relates to our last financial year 2015/2016, coinciding with our latest annual Corporate Responsibility Report). It includes a statement by our Chief Executive and Chairman, a description of actions and relevant policies relating to human rights, labour, environment and anti-corruption. Targets with status against these and key performance indicators are provided in more detail in our web published annual corporate responsibility reports as part of our annual corporate responsibility reporting cycle.

This statement is accessible through the United Nations Global Compact website, the Shoosmiths website and is communicated to our key stakeholders including partners and staff, clients and our local communities.

Much of our client work is confidential but this submission includes a number of examples of press releases where we have acted for clients on CR related matters.

FIND OUT MORE

Shoosmiths website

www.shoosmiths.co.uk

Access Legal website www.access-legal.co.uk

You can read our CR policies, key performance indicators, targets and reports and this Communication on Progress on the **CR section of our website**

www.shoosmiths.co.uk/about-us/corporate-responsibility-252.aspx

Stay in touch with our latest CR news via our blog **SHOUTback** http://shoutback.shoosmiths.co.uk

Follow us on twitter on www.twitter.com/shoosmiths or www.twitter.com/shoosmithsgrads

We would love to receive your feedback on our first Communication on Progress. Please send your comments, questions and suggestions to:

Corporate.responsibility@shoosmiths.co.uk

4. Human Rights and Labour Principles 1 to 6

Human Rights			



Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights and;

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Labour

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Human rights

Our supply chain entails the purchasing of goods and services that support the operation of our offices and services to our clients. Consumables purchased include office supplies, marketing materials, ICT equipment and estate services such as cleaning, waste management, office fixtures and fittings, security, uniforms and catering. Operating with integrity governs our approach and therefore our aspiration to be recognised by our stakeholders as an organisation which is a responsible corporate citizen in all our relationships.

We are an equal opportunities employer and were the first top 100 law firm to achieve Gold Standard Investors in People status. Our recruitment and employment procedures include appropriate preemployment screening of all staff to determine right to work in the UK. We expect all employees to conduct business with honesty and integrity and we have a zero tolerance approach to bribery and corruption. We expect our suppliers to share our commitments and approach and by collaborative working we believe we can jointly have a positive impact on society.

Shoosmiths has undertaken a number of Operations Board approved activities during the last twelve months in order to better understand the Shoosmiths supply chain and therefore how identified risks might be addressed. Shoosmiths is committed to ensuring we help to effect change in identifying and addressing human rights issues not least tackling slavery or human trafficking and our approach has included:

• Establishment of the Shoosmiths Supplier Code of Conduct for our goods and services suppliers. All new suppliers with effect from 1 March 2016 are requested to sign the code as well as priority identified suppliers;

- Review and updating of our Corporate Responsibility Policy and our
 Purchasing Policy and Guidelines. The latter details our responsible business
 expectations of suppliers in a number of areas including diversity, ethical, social,
 environment, health and safety issues and revisions have been made to provide further
 guidance on slavery and other human rights issues. Our whistleblowing policy was reviewed and
 updated to apply to suppliers as well as employees;
- Internal briefings provided to staff to raise awareness about the regulations and how to mitigate risk have included firm wide e mails, webinars and face to face office briefings. We are reviewing more specific training requirements for staff, especially those involved in procuring goods and services; and
- Procedure established providing guidance to practice groups and directorates on identification of
 potential risks and how to select priority suppliers for risk based engagement. This is to facilitate a
 better understanding of countries where our goods and services are supplied from, any issues
 identified and programmes in place to address these issues, and any third party accreditations that
 suppliers participate in. Accountability for supplier relations, including documenting records of
 responses and approaches, and follow up actions rests with the relevant practice groups and
 directorates. Updates are provided to the Operations Board.

Practice groups and directorates have not identified any internal business procedures that could make demands of suppliers or contractors that might lead them to violate human rights and will keep this under review.

Shoosmiths has not been informed of any incidents of slavery or human trafficking during the year but will investigate any allegations should they arise and take appropriate action accordingly.

In the event of a slavery or human trafficking occurring or an allegation being made the matter will be reported to our Quality and Risk team to determine appropriate action.

Shoosmiths engages with other organisations to learn and to share best practice including Business in the Community and the Law Society.

Legal advice and training, including e-learning is provided to clients, led by our regulatory team in our Commercial Practice Group.

Our slavery and human trafficking statements are located on our Shoosmiths landing page **here** and our Access Legal landing page **here**.

Diversity and inclusion

At Shoosmiths we understand that the people we employ are the key to our success. We are committed to building a diverse workforce and providing a work environment that allows everyone to reach their full capability; one where individuals feel recognised for their talent and contribution regardless of background, beliefs or circumstances. We embrace the benefits inclusivity brings.

Shoosmiths has achieved significant recognition as a leader within the legal profession for its diverse workforce, being the first UK legal practice to gain a Gold Standard Equality Assured Recruitment (EQA) accreditation and topping the Black Solicitors Network Diversity League Table in 2006, 2011 and 2012.

We were a founding signatory of the Law Society's Diversity and Inclusion Charter and the most recent Diversity League Table results help illustrate our approach:

- ranked sixth for female partners (37% female partnership);
- ranked fifth for female associates (68% associates are female);

- ranked eighth for female trainees (69% of trainees are female);
- ranked ninth for female paralegals (74% of paralegals are female);
- one third of our Operations Board is female and we are one of only eight firms in the UK with a female CEO; and
- ranked sixth in the Diversity League Table (DLT) 2015. Scores are based on both demographic of who we have in the business and a score for our policy and working practices.

In May 2015 the graduate recruitment team accepted the Commendation for Diversity by LawCareers.net (LCN) and looking beyond the profession we were also the first top 100 law firm to achieve Investors in People Gold Standard 2011 (just 6.6% of all UK companies hold this) and the first to be reaccredited in 2015.

Shoosmiths has continued to partner with organisations to advance work on equality, diversity and inclusion for both the firm and the profession. As a founding signatory of the Law Society's Diversity and Inclusion Charter, we actively support initiatives to attract minority groups to the legal profession, such as via the Black Lawyers Directory (BLD). We have been involved in the Legal Launch Pad programme (LLP), managed by the Black Lawyers Directory since its launch in 2008 and this is included within our trainee recruitment programme. We also partner with groups such as Birmingham Black Lawyers, Aspiring Solicitors, Women in Law and Black, Asian and Minority Ethnic (BAME) majority schools. We are a founding member of the Diversity in Professional Services Scotland (DIPPS) which was established in August 2015 with the aim of increasing diversity in the professional and financial services in Scotland. As part of our Young People in Law programme (YPiL) we support schools across the UK by providing career guidance, mock interviews and skills sessions. Opportunities to participate in YPiL are available for all employees.

Shoosmiths offers a one-week summer placement scheme to those who wish to pursue a career in law, with 60 places provided during the reporting year. Six of these places were offered to students who had signed up to the Legal Launch Pad scheme run by the Black Lawyers Directory. We also provide work shadowing opportunities of up to three days for those who have not yet made a decision but wish to experience a legal work environment, with 85 places provided in 2015/2016.

In May 2016 we appointed a full time Diversity, Inclusion and Wellbeing Manager to review and develop our diversity, inclusion and wellbeing strategy and to provide focus and drive performance in this area.

In October 2016 the Board approved a Diversity and Inclusion strategy setting out our ambition to be a sector leader in terms of diversity and inclusion. The board recognises that the delivery of our strategy relies on our ability to attract, retain, support and develop a diverse workforce and provide an environment where people are valued, feel healthy and happy and can achieve their full capability. In doing so we will ensure we have the best people, that they are happy and confident in developing great relationships and are capable of delivering fantastic results and a unique service to our clients. Our priorities are:

- To build a diverse workforce that is able to respond to a diverse customer base;
- To understand our staff population;
- To cultivate an inclusive working environment that leverages the benefits of diversity and values the contribution of all staff;
- To identify and address barriers within our structures; and
- To have policies and processes in place that meet the needs of our staff.

We continue to build networks with other law firms, the Law Society, the City Diversity Forum and significant diversity bodies such as Stonewall, Aspiring Solicitors, the Social Mobility Forum, City Diversity Forum and Business in the Community.

In October 2016 we achieved accreditation as a Diversity Confident employer, a government scheme designed to encourage employers to recruit and retain disabled people and those with health conditions. The scheme replaces the Two Ticks Positive About People scheme which we had been accredited by for a number of years. Disability Confident broadens and develops that original commitment with a demonstration by accredited organisations of a proactive approach to employing disabled people and developing their abilities.

As a Disability Confident employer we are committed to:

- Actively look to attract and recruit disabled people;
- Providing a fully inclusive and accessible recruitment process;
- Offering an interview to disabled people who meet the minimum criteria for the job;
- Being flexible when assessing people so disabled job applicants have the best opportunity to demonstrate that they can do the job;
- Making reasonable adjustments as required;
- Encouraging our suppliers and partner firms to be Disability Confident;
- Ensuring employees have sufficient disability equality awareness;
- Promoting a culture of being Disability Confident;
- Supporting employees to manage their disabilities or health conditions;
- Ensuring that there are no barriers to the development and progression of disabled staff;
- Ensuring managers are aware of how they can support staff who are sick or absent from work;
- Valuing and listening to feedback from disabled staff; and
- Reviewing our Disability Confident self-assessment.

We are committed to helping staff achieve an effective work/life balance, enabling them to balance personal commitments and work demands. Our policies include:

- flexible working;
- home and mobile working;
- flexible holidays;
- parental leave;
- parent return to work;
- your time which provides the opportunity to 'take back' some time when life outside work as to take priority from time to time to manage the needs of family and friends; and
- volunteering to encourage one day a year volunteering in the community.

We continue to gauge how our people feel about a number of aspects of working at Shoosmiths. This feedback will help us ensure we're giving our people the right tools, support and environment they need to thrive.

Mindfulness training for board and partners in May 2016 was aimed at furthering this agenda http://www.shoosmiths.co.uk/news/press-releases/mindfulness-is-on-the-agenda-at-shoosmiths-11296.aspx

4a. Helping our clients

We are committed to the provision of legal advice on a pro bono basis to organisations and individuals unable to afford advice. The definition of pro bono used by the Law Society and Bar Council is 'legal advice or representation provided by lawyers in the public interest including to individuals, charities and community groups who cannot afford to pay for that advice or representation, and where public and alternative means of funding are not available'.

We are a signatory of and abide by the requirements of the Joint Protocol for Pro Bono Legal Work which quality marks legal work by promoting and ensuring consistently high standards of pro bono work.

In November 2016 we became a founding signatory of the Law Society Pro Bono Charter, having participated during the consultation stage which took place from May 2016. As a signatory we are committed to improving access to justice for those individuals and organisations who have legal needs and are ineligible for legal aid and unable to afford to pay for legal services.

1,176 pro bono hours were recorded during 2015/2016, representing a 26.8% increase on the 928 hours recorded in 2014/2015.

Our Access Legal helpline established in January 2010 provides free advice to individuals. It operates six days a week and received more than 13,000 enquiries during 2015/2016 on conveyancing, employment, claims, land, legal disputes, medical negligence, mixed liability, motor, serious injury and wills, probate and wealth protection (not included in the pro bono hours stated above).

We work closely with a number of pro bono partners to provide free legal advice to those in need.

Basingstoke Citizens Advice

In 2015/2016 we supported seven clinics advising on such issues as landlord and tenant, wills and estate, advice on money gifts and county court judgements.

Business in the Community (BITC) ProHelp

We support BITC's ProHelp scheme in the East Midlands (our Nottingham office) and the West Midlands (our Birmingham office). Financial donations were also made to support the operation of the two schemes.

ProHelp cases taken on during the year included:

Incorporation and membership subscriptions advice for Archives West Midlands which exists to advance education for public benefit by supporting the collection, storage, preservation and access to archival materials relating to the West Midlands region.

Guidance on setting up a Community Interest Company and drafting the Constitution for the Disability Resource Centre. The charity is a pan-disability organisation which provides a wide range of support and services to disabled adults, their families and carers.

Articles of association advice for Koco Community Resource Centre which works with a range of community groups in the advancement of education, furtherance of good health and the relief of sickness and distress.

Property advice for St Paul's Community Development Trust to help in its plans for expansion of its school and educational provision. The Trust works with and for the community in Balsall Heath and nearby areas to create better opportunities and life chances for those who live and work there.

TUPE advice for Walsall Street Teams which works with children and young people at risk of, and affected by, sexual exploitation, grooming and trafficking.

East Manchester Legal Advice Centre

Our Manchester office supports the East Manchester Legal Advice Centre operated in conjunction with students from the University of Manchester. Last year, Shoosmiths assisted with a variety of matters such as property related disputes and family matters.

Edinburgh Centre for Professional Legal Studies

Our Edinburgh office supports the free legal advice centre provided by the Edinburgh Centre for Professional Legal Studies at the Edinburgh University School of Law. The service is provided by diploma students who are supervised by qualified solicitors and gives students the opportunity to take part in hands-on legal work for the benefit of the community. During 2015/2016 15 clinic sessions were supported, assisting clients in such matters as family law, property and tenancy disputes and consumer issues. The supervising solicitor attends the meeting between the client and the student adviser and thereafter assists with and carries out a revisal of the advice that is then issued.

LawWorks

We support a number of pre-appointment based pro bono clinics based on the LawWorks model including clinics in Reading and Northampton.

CommuniCare Legal Advice Centre

Our Thames Valley office supports the East Reading based CommuniCare Legal Advice Centre operated in conjunction with students from the University Of Reading School Of Law. Last year, Shoosmiths advised at 11 clinics on a variety of issues such as employment, consumer, probate and tenancy.

Northampton pro bono clinic

Our Northampton office supports the Northampton pro bono clinic operated in conjunction with Citizens Advice Central and East Northamptonshire and students from the University Of Northampton School Of Law. Last year, Shoosmiths advised 29 clients at monthly advice clinics on a variety of matters such as employment, family, landlord and tenant and housing.

Our real estate and corporate practice groups also support the LawWorks Not-For-Profits Programme which delivers free legal advice to charities, voluntary and community organisations and social enterprises. During the year we provided property advice for Fusion Arts, The Feminist Library and Durham Deafened Support and corporate advice to Hammersmith and Fulham Mind.

We sought to raise awareness of the importance of undertaking pro bono work by hosting and supporting a number of pro bono events before, during and after National Pro Bono Week which took place 7 to 11 November 2016.

Treating customers fairly (TCF) is embedded from the top and throughout the firm. Firm-wide arrangements include a formal governance framework which provides management and clients with the assurance that Shoosmiths is effectively managed and controlled and that clients/customers are treated fairly. These governance arrangements enable senior management to have a clear view of activities and risks and to ensure that these are managed appropriately in line with the rules and guidance of our regulators.

All staff are responsible for ensuring clients/customers are treated fairly through training of staff and performance management, and by embedding adherence to firm-wide policies and procedures into their day to-day activity.

Our employees need to be aware of issues that may arise when advising clients who are dealing with vulnerable adults, including those with mental health difficulties. This is particularly relevant for our Recoveries Services Group which advises clients on debt recovery. Our staff training and awareness programme aims to help customers who are in debt difficulties and who need help. This includes new starter and refresher vulnerability training as well as quarterly awareness campaigns designed to highlight specific issues. Best practice is shared across the teams including via tip of the week, posters and quizzes. Discussions/reviews with staff ensure they

are confident in knowing how to respond and signpost clients. Staff who deal with difficult conversations and the vulnerable on a regular basis are also made aware of the support available to them which can be accessed via our intranet.

Our vulnerable adult and mental health issues policies and procedures are reviewed against new industry guidance to ensure best practice is maintained. During 2015/2016 we considered the British Bankers Association (BBA) *Improving Outcomes for Customers in Vulnerable Circumstances*, Money Advice Liaison Group *Best Practice in the Use of Flags*, Lending Standards Board *Standards Development Review Customers in Vulnerable Circumstances* and BBA and Citizens Advice *Addressing Financial Abuse*, as well as other guidance.

We advise and support our commercial clients on many topics that have relevance in the CR arena. Examples in the public domain include:

Helping a company save hundreds of jobs: http://www.shoosmiths.co.uk/news/press-releases/shoosmiths-strikes-cva-deal-for-national-coffee-chain-12227.aspx

Speaking on the Modern Slavery Act at the Ethical Labour in Construction Leadership Symposium.

http://www.shoosmiths.co.uk/news/press-releases/shoosmiths-on-modern-slavery-at-house-of-commons-11819.aspx

Advising Kingdom Housing Association on affordable housing development in Fife:

http://www.shoosmiths.co.uk/news/press-releases/shoosmiths-advises-kingdom-affordable-housing-in-fife-11808.aspx

Social housing advice provided to Dunedin Canmore Housing on the phase two acquisition of its social housing development in Eskmills, Musselburgh. Dunedin Canmore, part of Wheatley Group, is a non-profit making charity and leading provider of social housing in Edinburgh, the Lothian and Fife. The development in Musselburgh, is part of a drive to help older people live independently in their homes for longer.

Modern Slavery Act advice and training has been provided to clients by our regulatory team including board briefings, compliance checklists, amending contracts to include anti-slavery clauses, assisting with business deals clients are undertaking – considering if other parties involved are affected by the legislation, conducting supply chain due diligence, inserting anti-slavery clauses in agreements -, assisting with statement drafting, reviewing and amending audit questionnaires.

Our employment/immigration team has provided advice on prevention of illegal working policies and procedures, carrying out prevention of illegal working audits and undertaken training for staff undertaking checks on illegal working.

During 2015/2016 we published 216 legal updates on our Shoosmiths website Articles relevant to the human rights and labour agenda covered such issues as:

Changes to immigration rules: http://www.shoosmiths.co.uk/client-resources/immigration-update-changes-to-the-immigration-rules-12237.aspx

Gender pay gap reporting regulations: http://www.shoosmiths.co.uk/client-resources/gender-pay-gap-reporting-final-regulations-published-12224.aspx

http://www.shoosmiths.co.uk/client-resources/public-sector-consultation-on-gender-pay-reporting-11761.aspx

http://www.shoosmiths.co.uk/client-resources/gender-pay-gap-reporting-what-canemployers-do-now-11619.aspx

http://www.shoosmiths.co.uk/client-resources/gender-pay-reporting-consider-bonus-payments-now-11190.aspx

http://www.shoosmiths.co.uk/client-resources/gender-pay-gap-revolution-moves-closer-10963.aspx

http://www.shoosmiths.co.uk/client-resources/gender-pay-gap-reporting-why-does-it-matter-10862.aspx

Gender segregation in schools not direct sex discrimination: http://www.shoosmiths.co.uk/client-resources/gender-segregation-in-schools-12219.aspx

Top tips for managers handling long term absence: http://www.shoosmiths.co.uk/client-resources/tips-managers-handling-long-term-absence-12157.aspx

Modern Slavery Act: http://www.shoosmiths.co.uk/client-resources/modern-slavery-compliance-tick-box-exercise-12129.aspx

http://www.shoosmiths.co.uk/client-resources/modern-slavery-just-compliance-or-wider-human-rights-12128.aspx

http://www.shoosmiths.co.uk/client-resources/modern-slavery-statements-due-september-2016-11696.aspx

http://www.shoosmiths.co.uk/client-resources/modern-slavery-legislation-a-global-outlook-11250.aspx

 $http://www.shoosmiths.co.uk/client-resources/modern-slavery-countdown-to-compliance-\\ 11124.aspx$

http://www.shoosmiths.co.uk/client-resources/modern-slavery-what-does-it-mean-for-smes-10960.aspx

Apprenticeship levy: http://www.shoosmiths.co.uk/client-resources/apprenticeship-levy-details-start-to-unfold-11948.aspx

http://www.shoosmiths.co.uk/client-resources/new-apprenticeship-levy-further-details-released-11244.aspx

http://www.shoosmiths.co.uk/client-resources/the-new-apprenticeship-levy-for-employers-10957.aspx

Right to work checks: http://www.shoosmiths.co.uk/client-resources/follow-up-right-to-work-checks-are-you-compliant-11934.aspx

Zero hours contracts: http://www.shoosmiths.co.uk/client-resources/zero-hours-contracts-sport-direct-to-use-them-less-11845.aspx

http://www.shoosmiths.co.uk/client-resources/zero-hours-contracts-protections-for-staff-in-place-10928.aspx

Zero-hour workers – their forgotten rights: http://www.shoosmiths.co.uk/client-resources/zero-hours-workers-their-forgotten-rights-11081.aspx

National minimum wage: http://www.shoosmiths.co.uk/client-resources/rises-in-the-national-minimum-wage-employers-beware-11829.aspx

Maternity rights: http://www.shoosmiths.co.uk/client-resources/maternity-rights-and-wrongs-ten-tips-for-employers-11826.aspx

Time off for dependants: guidance for employers: http://www.shoosmiths.co.uk/client-resources/time-off-for-dependants-guidance-for-employers-11784.aspx

Criminal record checks: http://www.shoosmiths.co.uk/client-resources/criminal-record-checks-when-is-the-past-truly-history-11671.aspx

Internships and work experience: http://www.shoosmiths.co.uk/client-resources/internships-and-work-experience-tips-for-employers-11609.aspx

Acas code on disciplinary and grievance procedures: http://www.shoosmiths.co.uk/client-resources/rulings-acas-code-disciplinary-grievance-procedures-11554.aspx

Transgender equality: http://www.shoosmiths.co.uk/client-resources/transgender-equality-government-equality-agenda-11548.aspx

http://www.shoosmiths.co.uk/client-resources/transgender-equality-signs-of-the-times-11368.aspx

http://www.shoosmiths.co.uk/client-resources/transgender-equality-time-to-act-10856.aspx

Immigration Act 2016: http://www.shoosmiths.co.uk/client-resources/immigration-act-2016-first-provisions-coming-soon-11487.aspx

Private landlords and human rights: http://www.shoosmiths.co.uk/client-resources/human-rights-when-claiming-residential-property-11451.aspx

Women in the workplace: http://www.shoosmiths.co.uk/client-resources/dawn-of-a-new-era-for-women-in-the-workplace-11437.aspx

Disability cases continue to challenge employers: http://www.shoosmiths.co.uk/client-resources/disability-cases-continue-challenge-employers-11374.aspx

Disability discrimination in attendance management policies: http://www.shoosmiths.co.uk/client-resources/disability-discrimination-management-polices-10849.aspx

Ramadan: practical considerations for employers: http://www.shoosmiths.co.uk/client-resources/ramadan-practical-considerations-for-employers-11371.aspx

National Living Wage: http://www.shoosmiths.co.uk/client-resources/national-living-wage-controversy-continues-11271.aspx

National minimum wage http://www.shoosmiths.co.uk/client-resources/new-national-minimum-wage-rates-announced-11078.aspx

http://www.shoosmiths.co.uk/client-resources/the-national-living-wage-time-to-prepare-11023.aspx

Employee rights when employers are in administration: http://www.shoosmiths.co.uk/client-resources/employer-in-administration-what-this-means-11259.aspx

Redundancies: lesser known employer duties: http://www.shoosmiths.co.uk/client-resources/redundancies-lesser-known-employer-duties-11253.aspx

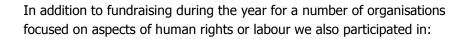
Right to work in the UK: http://www.shoosmiths.co.uk/client-resources/right-to-work-in-the-uk-dismiss-fairly-11236.aspx

Minimum salary increase: http://www.shoosmiths.co.uk/client-resources/minimum-salary-increase-6-april-fact-or-fiction-11224.aspx

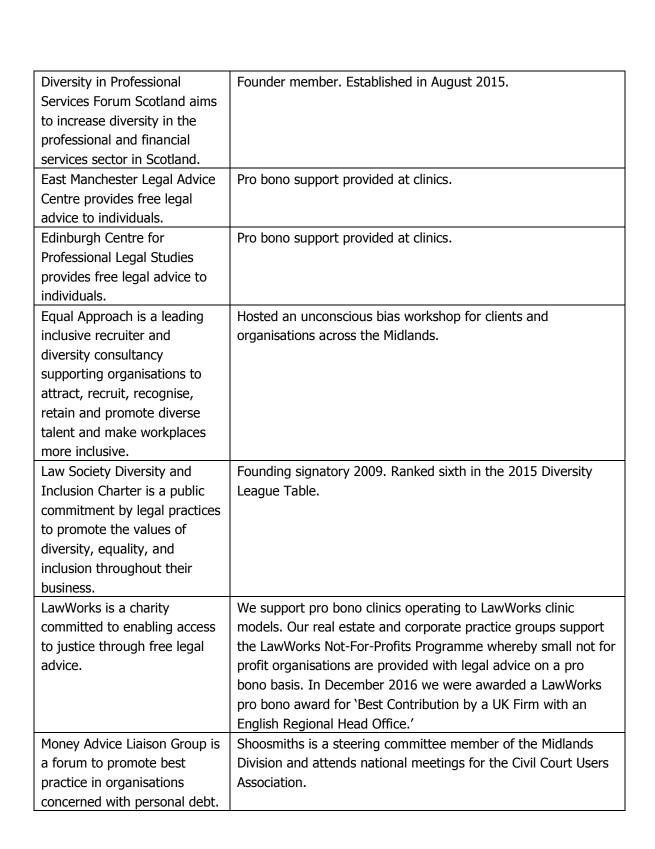
Amending affording housing obligations: http://www.shoosmiths.co.uk/client-resources/amending-affordable-housing-obligations-developers-11158.aspx

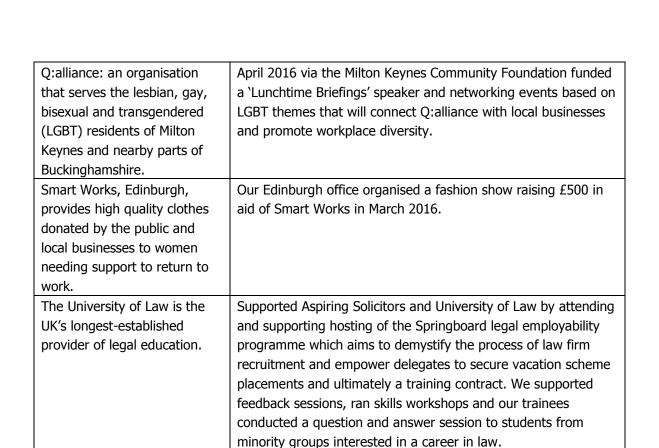
Dyslexia discrimination: http://www.shoosmiths.co.uk/client-resources/dyslexia-discrimination-11000.aspx

4b. Organisations we have worked with



Organisation	Activity
Aspiring Solicitors is an	Supported Aspiring Solicitors and University of Law by
organisation committed to	sponsoring attending and supporting hosting of the Springboard
increasing diversity in the	legal employability programme which aims to demystify the
legal profession.	process of law firm recruitment and empower delegates to
	secure vacation scheme placements and ultimately a training
	contract. We supported feedback sessions, ran skills workshops
	and our trainees conducted a question and answer session to
	students from minority groups interested in a career in law. In
	November 2016 we formalised our relationship with Aspiring
	Solicitors becoming Affiliate Members. We launched the
	partnership with an event in our Birmingham office on 28
	November 2016 where attendees had the opportunity to learn
	more about a career in law, hear first-hand about experiences
	of people entering the profession and gain practical skills which
	will help them during the recruitment process. See article here.
Birmingham Black Lawyers	January 2016 our Birmingham office hosted a careers evening
aims to have a tangible effect	with speakers talking about their experiences to achieving a
by vigorously promoting a	career in law and our recruitment team talking about application
higher level of integration	skills.
within the legal community.	
Black Lawyers Directory aims	Delivered careers workshop to raise aspirations of candidates.
to make a real difference on	
diversity, highlighting areas	
where much is being done and	
areas that could do better and	
showcasing talent.	
Business in the Community is	We are corporate members of BITC and support a number of its
a business led charity with the	programmes including Business Class, Mayday Network, East
ethos of building a fairer	Midlands and West Midlands ProHelp programmes and reading
society and a more	in primary schools literacy coaching.
sustainable future.	
Citizens Advice provides	Pro bono support provided at clinics for individuals organised in
advice to people on a wide	Basingstoke and Northampton.
range of problems.	
CommuniCare is a support	Pro bono support provided at clinics organised in Reading.
centre in Reading that	
provides advice on a range of	
issues.	





4c. Our 2016/2017 human rights and labour targets

- Appoint a Diversity, Inclusion and Wellbeing Manager;
- Review purchasing policy and guidelines and identify opportunities to improve how diversity and inclusion are considered through the supply chain;
- Flexible working to be promoted as an accessible benefit for all staff through the introduction of a range of options;
- Review and implement updated diversity and inclusion in the workplace strategy, highlighting goals and protected characteristics of focus;
- Identify and work with appropriate external interested parties to progress diversity, inclusion and wellbeing within the firm;
- Offices to support appropriate diversity, inclusion and wellbeing campaigns;
- Review and implement an updated wellbeing strategy across the firm that staff perceive enhances their work experience;
- Establish a new employee recognition process for staff advising vulnerable adults; and
- Consider potential for expanding formal pro bono services provision by supporting appropriate schemes.

5. Environment Principles 7 to 9

Environment

Principle 7: Businesses should adopt a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Shoosmiths is committed to protecting the environment by demonstrating high standards of environmental responsibility in all its operations and preventing or mitigating the environmental impacts associated with our activities, products and services. 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.

The most material issues for our business are: paper and resource use; energy use and carbon emissions associated with our buildings, IT systems and employee travel; and waste and recycling.

Our environmental management system (EMS) is based on the ISO 14001:2015 standard. Our environmental policy statement defines our approach in striving to achieve balance in the three pillars of sustainability – environment, society and the economy. This statement is supported by more specific policy statements on energy and waste management.

Our procurement and supplier management policy sets out our approach to managing our indirect environmental and social impacts and we work with our suppliers to identify opportunities to reduce impacts.

We have targets to improve our performance in key areas. These are approved by the Operations Board and we have assigned clear ownership for their management and delivery. Our annual CR reports include full details of key performance indicators, targets and progress.

Shoosmiths operates an incident reporting system which includes environmental incidents. No environmental incidents were recorded during 2015/2016.

We measure and minimise the environmental impacts associated with our use of resources (including energy use) and the waste we generate from our buildings and as a result of the services provided to clients.

Our 13 offices in 12 locations include both single lease and multi-tenanted buildings. Our Birmingham office (multi-tenanted) at Colmore Square holds an 'excellent' rating from BREEAM (Building Research Establishment Environmental Assessment Methodology). The Apex Plaza building (multi-tenanted), Reading, where we have an office, is ISO 14001 certified.

A number of office changes were undertaken during the year including in October 2015 a temporary transition in Manchester to the HQ Building at the Old Granada Studios in Atherston Street. Plans were also being finalised to undertake major refurbishment works at our Thames Valley office as part of our Agile Working project.

In December 2016 we opened a new office in Leeds and also entered the Northern Ireland market when we opened in Belfast. The Belfast office follows a merger with Belfast firm McManus Kearney.

Where we have direct control of our offices, for example buildings where we are the sole tenant, we have a greater ability to influence change. Where we do not have direct control, we liaise with our landlords to identify opportunities, for example through tenant sustainability working groups.

During 2015/2016 we undertook internal office environmental audits as part of our annual health, safety and environmental audits. This process is managed by our firm-wide health and safety manager. We also hired an external consultancy to conduct a desk top legislative register review and one day site audits of our Nottingham (multi-tenanted) and Solent (single lease) offices to assess environmental legislative and best practice compliance.

In 2016/2017 we conducted external second party environmental audits at our Birmingham and Reading offices and use a third party to advise on the environmental aspects register component of our environmental management system.

Resource management

During 2015/2016 a focus on paper light working which reduces dependency on paper and encourages best practice processes across teams involved each practice group and directorate being tasked with establishing soft filing protocols to help reduce the circa 43 million printed sheets produced by the firm. Project Footprint involved most of our printing estate being replaced and the implementation of virtual printing; an effective way to reduce wastage and inappropriate access to sensitive information. To support this change new Macroview email filing was introduced, staff training was undertaken and a retention policy developed for soft and hard data. As a consequence we saw our printed sheets consumption reduce by 28% to 31 million sheets.

Recycling old equipment

We work with partner organisations to ensure that equipment that can no longer be used within the business is reused or recycled by others.

Since 2008, Shoosmiths has donated old IT equipment to Computer Aid International, a charity that helps disadvantaged communities to access digital equipment that will improve their lives. Computer Aid takes the equipment, wipes the data from it and donates it to different programmes across the world. Our computers typically have a five year life and by donating them in this way we can extend the life of our equipment by another three to four years.

There are significant environmental benefits associated with the refurbishment of PCs. Up to 80% of the energy used in a PC's working life is expended during manufacture, so refurbishment of a computer is 20 times more efficient than recycling it. ¹ (Source: Williams E. and Sasaki T. 2003. Strategizing the End-of-Life Handling of PCs. In Williams, E. et al. (Eds) *Computers and the Environment: Understanding and Managing their Impacts.* Dordrecht: Kluwer Academic Publishers, pp. 183-196).

During 2015/2016, 1,160 items (9,035.5 kg) were donated to Computer Aid, with items sent to Ethiopia (27%), Zambia (23%), Zimbabwe (21%), Nigeria (18%) and Sierra Leone (11%) for reuse. Not all items could be reused, and 35 items (122 PCs, 62 TFT screens) were recycled.

Ethiopia – Computer Aid distributed computers to primary and secondary schools for ICT literacy learning in the Amhara region as well as Southern Ethiopia. Over 120 Ethiopian schools receive computers via Computer Aid each year enabling students to access new technology for the first time.

Zambia - Computer Aid sent computers to schools in Zambia distributed through its partner SchoolNet Zambia. Since the Ministry of Education has integrated ICT in the curriculum in secondary school exams there has been a significant need of computers but insufficient budget to provide computers to all schools. For example one of the beneficiary schools previously had five machines for 800 students. The school now has a fully functioning ICT lab enabling 60 children to take a practical test simultaneously. Over 50 Zambian schools were supplied with Shoosmiths computers enabling children to have access to the same ICT curriculum as in the UK.

Nigeria – Shoosmiths computers were sent to an entrepreneurship programme operated with O'Bay Nigeria, a local organisation that finds practical solutions to deal with unemployment amongst young adults. The programme trains unemployed people under 30 years of age to create social enterprises and to develop their businesses online. With an unemployment rate of over 50% for individuals in Nigeria between 25 and 34 years old this initiative is a means of developing businesses that will benefit local communities and create more jobs locally.

Sierra Leone – Computer Aid provided computers to primary schools students who have never had access to ICT. While internet access is still limited, children now have access to encyclopaedia pre-installed on computers and learn how to use the Microsoft Office suite. By the end of their primary school ICT learning, children in Sierra Leone know how to use Excel, Word and PowerPoint and can produce their coursework and presentations digitally. They also have access to information that would not be possible without the digital encyclopaedia. This helps them to build confidence in their studies and enables them to widen their career ambitions at a later stage in their lives.

Zimbabwe – Computer Aid sent computers to Lupane State University in Zimbabwe to expand its ICT laboratory. The University has opened three more ICT rooms holding 40 computers each to respond to the high demand of the students and the computers donated by Shoosmiths will enable next year's graduates mainly in IT and Marketing to practice modules they have been taught in class, enabling them to access four times more practice and training than they would have received without those computers. For these young adults, it means that they will be fully equipped to apply for IT support, graphic designing, creative and copy writing roles as soon as they graduate rather than seeking jobs that do not require IT skills.

We also reuse furniture and office equipment within the business wherever appropriate. For example during our Manchester offices moves existing furniture was transferred to the new premises.

Stationery

Our approach is to use recycled stationery where we can and copier paper, which is our highest usage paper is Forest Stewardship Council (FSC) certified. We will continue to investigate new opportunities during 2016/2017.

During 2015/2016 Shoosmiths used 987 lines of stationery, of which 279 have environmental credentials. Of these lines, 8 products have 100% recycled content and 271 partial recycled content. We used 12 FSC certified paper products, which constituted about 89% of our paper spend.

For the third consecutive year we reported paper consumption data to the Legal Sustainability Alliance, a collaborative network committed to environmental improvement.

Bottled water

We use on-site water purification systems across our offices to provide freshly filtered water, both still and sparkling for our client and internal meetings. This has a lower carbon footprint than bottled mineral waters and because the bottles are reused it reduces waste. Between May 2015 and April 2016 we consumed 31,683 litres of water and avoided 5.88 tonnes of glass needing to be recycled or disposed of.

Energy and carbon

Shoosmiths occupies sole and multi-tenanted buildings and consumes electricity and gas for heating, ventilation, air conditioning, lighting and IT equipment. Our electricity consumption decreased by 4.91% during 2015/2016 at sites where we control energy use. Our gas consumption, however increased by 9.92%.

As a consequence of the 2014 Energy Savings Opportunity Scheme regulations we appointed an accredited lead assessor that had also previously undertaken a gap analysis of our readiness for compliance. The assessor undertook measurement of our building and transport related energy consumption and undertook representative sample site energy efficiency audits at our offices in Birmingham (multi-tenanted), Lakes in Northampton (sole tenant) and Southampton (sole tenant).

Business travel data was analysed based on company expense claims, mileage travelled in private cars on business purposes and company car mileage data. A survey was issued to all staff in June 2015 on employee travel patterns.

A number of strategic and operational recommendations to help us improve our energy management system were identified including specific short, medium or long term investment opportunities.

The Operations Board subsequently approved a number of recommendations:

- Gas, electricity and travel reduction targets;
- Board approved energy policy;
- Voluntary declaration of our approach to the regulations;
- Review of our travel policy to encourage adoption of travel hierarchy approach to business related travel:
- Increased focus on reducing the need for travel via agile working, virtual meetings, online collaboration tools etc; and
- Review of vehicle purchasing policy to determine technical/commercial viability to favour electric or hybrid vehicles.

We track gas and electricity consumption at our offices through monthly reporting.

The Legal Sustainability Alliance established by the Law Society is a movement of law firms committed to reducing their carbon footprint and adopting environmentally sustainable practices. We became a signatory in December 2008 and provide annual data on our carbon footprint, paper consumption and water use and a summary of our adherence to the seven climate change principles that is included in the Legal Sustainability Alliance annual report.

Agile working

Agile working is about bringing people, processes, connectivity and technology, time and place together to find the most appropriate and effective way of working to carry out a particular task. Agile working for Shoosmiths means any time, any place, anywhere, is a transformational tool deploying new technologies, encompasses different working methodologies, processes and procedures and incorporates different work styles including mobile, home, and flexible working. The benefits of agile working are a more responsive, efficient and effective business, maximised flexibility to adapt to market forces the provision of a working environment that attracts and retains talent and that facilitates an innovative and collaborative workplace and reduced environmental impacts.

During 2015/2016 an agile working culture was embedded into the firm's strategic objectives, creating an aligned cross-functional delivery programme and therefore infrastructure platform and tools to facilitate the adoption of agile working. The Thames Valley office was selected as the pilot project, with the establishment of clear overall objectives for agile working. Key performance indicators focused on creating an organisational methodology of working that improves Shoosmiths ability to provide an exceptional service to its clients, one that is focused on wellbeing, that retains talent and which makes Shoosmiths the employer of choice. The refitted office was fitted with Light Emitting Diode (LED) lighting and new air conditioning equipment and the same floor space now has the capacity to accommodate an additional 40 to 50 people (+36%). Extensive data gathering and staff engagement has determined a clear appreciation and definition of what the spirit of agile working means for Shoosmiths and therefore our future plans. During 2016/2017 we aim to move 30% of Shoosmiths employees to agile working, with further adoption being driven by office leasing review opportunities.

Mobile working is a key consideration in all IT planning, enabling virtual working and collaboration supported by technical solutions such as Live meeting, web cams, e-learning technologies and conference call facilities.

Smart travel

Efficient driving techniques can help to reduce fuel use and associated emissions. Every driver who undertakes more than 5,000 business miles annually, carries out frequent business journeys or who is newly qualified must complete online driver training every three years.

We provide interest-free loans for rail and business season tickets and participate in the government's Cycle to Work scheme. This initiative, co-ordinated on our behalf by the consultancy Gemelli Employee Benefits seeks to encourage take-up of cycling as a more sustainable mode of transport that also improves general health and fitness. We publicise the scheme on our intranet and during induction training for new employees. During 2015/2016, 24 colleagues took part.

Waste management

FISco, our estates management provider, manages our office waste (general and recyclable) in three office locations (Basingstoke, Northampton and Southampton). Some waste streams at our Northampton office are managed on our behalf by a provider.

At our other offices (Birmingham, Edinburgh, Manchester, Milton Keynes, Nottingham and Reading) as well as our London hot desking facility, the landlords are responsible for managing waste contracts. Here we work with landlords alongside other tenants to identify ways of better managing our waste.

We have data for waste produced in our Basingstoke, Northampton, Nottingham and Southampton offices. In 2015/2016, these offices produced 96.64 tonnes of general waste, of which 87% was recycled (of which 57% was recovered as incineration with heat recovery) and 13% landfilled due to contamination issues. (This compares with 57.63 tonnes of waste produced in 2014/2015 of which 45% was recycled and 53% incinerated with heat recovery).

FISco also manages confidential waste from all our offices through a specialist company, Iron Mountain, with 154.02 tonnes collected in 2015/2016 (compared to 73.536 tonnes collected in 2014/2015). The waste was shredded and recycled into the approximate equivalent of 181.2 tonnes of recycled fibre - tissue and toilet paper. By recycling confidential waste 453 m³ of landfill space was avoided. We continue to focus effort to improve accuracy of recording waste via weighed bin data rather than estimated weights.

All archived paper material that is deemed no longer required for storage is security shredded via Smurfitt Kappa. 41.301 tonnes was collected from Shoosmiths in 2015/2016 and recycled into cardboard, toilet paper and writing paper.

In December 2016 we published a board approved waste management policy statement to provide further focus in this area.

Water management

Shoosmiths sites do not abstract or impound water and water management controls are within landlord controls and procedures. Shoosmiths ensures that relevant consents are in place and all conditions are complied with.

We aim to conserve water and to use water efficiently. Washroom provision includes the use of Infrared Urinal Flush Controls (IRC) consists of a solenoid valve and the sensor module. When the IRC detects movement in the washroom, a pulse from the sensor opens the normally-closed solenoid valve and water flows to the cistern; at the same time the sensor is switched off. After 25 minutes the power is restored to the sensor and, as long as no movement is detected for five minutes, the solenoid valve closes, shutting off the water supply to the cistern.

In our 2015/2016 annual CR report we have commenced providing data on our annual water consumption in buildings at locations under Shoosmiths control, namely Basingstoke, Northampton (Lakes and Victoria House premises) and Southampton.

5a. Helping our clients

We advised Octopus Energy Group Holdings Limited, wholly owned subsidiary of Octopus Capital Limited (Octopus), on its investment into specialist intelligent energy management technology firm, Reactive Technologies Limited (Reactive). Reactive leverages its deep expertise in communications engineering to bring a suite of new technologies to the market that will positively assist the energy industry to deliver cleaner, greener and more affordable energy, through more efficient and effective energy management: http://www.shoosmiths.co.uk/news/press-releases/shoosmiths-advises-octopus-on-reactive-technologies-12020.aspx

We published a number of environmental updates on such topics as:

Fracking: http://www.shoosmiths.co.uk/client-resources/fracking-up-the-pressure-11989.aspx

Habitat III – the applicability of New Urban Agenda: http://www.shoosmiths.co.uk/client-resources/habitat-iii-applicability-new-urban-agenda-12147.aspx

Minimum Energy Efficiency Standards: http://shoutback.shoosmiths.co.uk/?p=5137

5b. Organisations we have worked with

Organisation	Activity
Computer Aid International	In 2015/2016 1,160 items were sent to Ethiopia, Zambia,
is a charity that procures	Zimbabwe, Nigeria and Sierra Leone for reuse.
used IT equipment and	
sends it to disadvantaged	
communities across the	
world.	
Legal Sustainability Alliance	Pioneer member December 2008, signatory to the seven
(LSA) is a movement of	climate change principles for which we provided a progress
law firms and organisations	report during 2016 and submission to the 2015 LSA Carbon
committed to working	Footprint Protocol Report.
collaboratively to take	
action on climate change.	
'Manchester: A Certain	Shoosmiths is a signatory to the campaign.
Future' is Manchester's	
plan to tackle climate	
change.	
Reading Climate Action	Shoosmiths is a signatory of the network and features as a
Network is a group of	case study on its website.
businesses and	
organisations tackling	
climate change.	
WWF UK is a charity that	Our offices supported the Earth Hour campaign on Saturday
aims to stop the	19 March 2016 by switching off unnecessary lights and
degradation of the planet's	equipment.
natural environment.	

5c. Our 2016/2017 environment targets

- At sites where we control building energy use reduce electricity consumption by 3% in 2016/2017 versus 2015/2016. Where we do not control the building liaise with the landlord to identify opportunities to reduce electricity consumption;
- At sites where we control building energy use reduce gas consumption by 3% in 2016/2017 versus 2015/2016. Where we do not control the building liaise with the landlord to identify opportunities to reduce gas consumption;
- Implement appropriate opportunities identified during Energy Savings Opportunity Scheme audits undertaken in 2015:
- Review potential to source electricity from renewable sources at sites under Shoosmiths control subject to pricing objectives being satisfied;

- Using an external organisation establish an environmental aspects register and procedure and conduct a second party audit of two offices to assess legislative and best practice compliance, identifying opportunities for improvement; and
- Review business continuity planning to strengthen business resilience and capacity to climate related hazards and natural disasters.

6. Anti-Corruption Principle

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

We aim to operate to the highest standards of business integrity.

We have defined policies, processes, practices and control structures by which we ensure appropriate behaviour and consistent standards across the firm. Our compliance monitoring officers (within our Quality and Risk team) review compliance with those policies, systems and controls and report the results through our governance framework. The independent internal auditor who reports to the Chairman ensures that the second line of defence operates effectively.

Our management systems are accredited to the quality management system ISO 9001: 2008 (accredited since 1995) and the information security system ISO 27001: 2013 (accredited since 2010) and are based on the health and safety management system OHSAS 18001:2007, the environmental management system ISO 14001:2015 and the guidance on social responsibility ISO 26001:2010.

Business conduct

We are committed to conducting our business with honesty and integrity and we expect all partners/directors and staff to maintain high standards. All colleagues are expected to behave as ambassadors of the firm and we have clear procedures in place for how to do this, which are communicated and reviewed.

We take pride in being an ethical, transparent firm which acts with integrity at all times. We have a zero tolerance approach to bribery and corruption and comply with other statutory obligations.

Our policies cover such issues as anti-money laundering, data protection, anti-bribery and corruption, gifts and hospitality, quality and risk management and supplier management procedures. All colleagues complete regular training on these issues to ensure they are fully aware of their obligations. This includes a requirement for all new starters to complete our anti-bribery course during induction as well as the anti-money laundering and data protection courses.

We have a clear whistleblowing policy which sets out the process for reporting any concerns about wrongdoing or breaches of policies. This takes account of the requirements set out in chapter 10 of the SRA Code of Conduct and the guidance set out in the FCA's Senior Management Arrangements, Systems and Controls SYSC 18 in relation to the Public Interest Disclosure Act 1998. The policy was updated in November 2015 as part of our review of our approach to preventing slavery and human trafficking in the supply chain.

Staff are able to report suspected wrongdoing or dangers in relation to activities including criminal activity, miscarriages of justice, danger to health and safety, damage to environment, forced or compulsory labour or human trafficking, bribery, failure to comply with any professional obligations, financial fraud or mismanagement and any breach of the SRA Handbook, FCA Handbook, SRA Accounts Rules, the Law Society of Scotland rules, or the Law Society of Scotland rules, unauthorised disclosure of confidential information and deliberate concealment of any of the above matters.

We have reviewed and revised our anti-bribery policy and our gifts and hospitality policy which were approved by the Shoosmiths Executive Compliance Committee in December 2016. These documents are being issued to the business through a variety of communication channels to highlight the importance of anti-bribery and highlighting key points including the need to ensure our suppliers understand anti-bribery legislation.

We also have a range of procedures in place including supplier management policies etc.

6a. Our 2016/2017 anti-corruption targets

As a firm of solicitors regulated by the Solicitors Regulation Authority, the Law Society of Scotland and the Financial Conduct Authority, not only must we comply with anti-bribery legislation but we must ensure that we have robust systems and controls in place to satisfy our regulators that we are compliant with our legal and regulatory obligations.

January 2017