

SHOOSMITHS LLP COMMUNICATION ON PROGRESS FOR UN GLOBAL COMPACT

January 2018



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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.

In January 2018 the Global Compact introduced two distinct engagement tiers and we have determined our most appropriate level of support to be at signatory status. We continue to be a member of the UK Network and participate in its working groups on Modern Slavery and the 2030 global Sustainable Development Goals. Learning and sharing best practice with other members has enabled us to evaluate and improve our own approaches.

We have also considered the 2030 global sustainable development goals (SDG) and appendix 3 of our annual CR Reports from 2015/2016 onwards sets out our approach and relevant targets related to particular goals. In addition we have stated for 2017/2018 that we wish to:

- Become a supporter of the UK Stakeholders for Sustainable Development. (Which we achieved in July 2017);
- Conduct regular engagement with staff on their contribution to the 2030 SDGs; and
- Explore opportunities to collaborate with third sector organisations addressing one or more of the 2030 Sustainable Development Goals in the UK.

United Nations Global Compact Principles

Human Rights

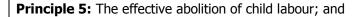
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights and;

Principle 2: Make sure they are not complicit in 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 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.

Anti-Corruption

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

WE SUPPORT



2. Chief Executive and Chairman Statement of Support

Welcome to our second 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.

Shoosmiths became a signatory 27 January 2016.

Being a signatory of the Compact and reaffirming our commitment gives us pause to reflect the difference we have been able to make and should be making as part of a wider contribution to society than purely one of financial value and attractiveness as an employer.

The Shoosmiths approach to 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 encourage everyone to play their collective part. We are particularly grateful to colleagues and teams who co-ordinate a range of projects including community investment programme committees, pro bono clinics, other brokered pro bono projects and team volunteering activities. They bring our CR commitments to life encouraging participation by individuals and teams across our offices.

During the last twelve months we became a founding signatory of the Law Society Pro Bono Charter, were accredited as a Disability Confident Employer, partnered with Aspiring Solicitors and backed Time to Change.

The 17 UN Sustainable Development Goals (SDGs) and 169 associated targets also provide a means of identifying opportunities to engage and collaborate with stakeholders and partners in areas where we impact and have the potential to influence change.

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 UK law firm working closely with Shoosmiths LLP NI. As at 2 January 2018 we had 189 partners and partner equivalents and 1,606 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 (two offices), 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 Solicitors, provides legal services to some equally blue chip individuals and their families.

We are accredited to the ISO 9001:2015 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 we are an Equal Opportunities Employer.

Our vision to be the leading national law firm famous for its 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.

Our business plan reflects 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 client experience.	activities, products and services.
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 annual CR Report and our CR blog SHOUTback.

This, our second annual Communication on Progress, covers the period January 2017 to January 2018 (although some of our data cited relates to our last financial year 1 May 2016/30 April 2017, 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.

Much of our client work is confidential but this submission includes a number of examples where we have acted for clients on CR related matters and the clients have consented to the disclosure of their names. Other client resources include training, workshops, how-to guides, e-learning, legal updates and a quarterly legislative tracker entitled Compendium. This provides an overview of anticipated legal developments, timeframe for implementation and practical suggestions for steps that can be taken.

FIND OUT MORE

Shoosmiths website www.shoosmiths.co.uk

Access Legal Solicitors website https://www.accesslegalsolicitors.co.uk/

You can read our CR policies and annual CR and United Nations (UN) Global Compact Communication on Progress (COP) reports on the **CR section of our website**

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



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

You can read our annual slavery and human trafficking statement on the landing page of our Shoosmiths and Access Legal Solicitors websites.

http://www.shoosmiths.co.uk/slavery-and-human-trafficking-statement-11579.aspx https://www.accesslegalsolicitors.co.uk/slavery-and-human-trafficking-statement

We would love to receive your feedback on our second 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;

Principle 2: Make sure they are not complicit in 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.

Human rights

Our policies and commitments

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. Our responsible business policies include:

Corporate responsibility policy Environment policy Health and safety policy Pro bono policy Supplier code of conduct



We are an equal opportunities employer and were the first top 100 law firm to achieve 'Gold Standard Investors in People' status.

Our employee policies and procedures set out our requirements on such issues as disciplinary, grievance, equal opportunities, flexible working, harassment and bullying, home and mobile working and recruitment best practice.

We expect all employees to conduct business with honesty and integrity and we have a zero tolerance approach to bribery and corruption with policies and regular training undertaken on this and other such issues as anti-money laundering, gifts and hospitality and counter terrorist financing.

Our whistleblowing policy sets out the process for reporting any concerns about wrongdoing or breaches of policies including forced or compulsory labour or human trafficking.

Modern Slavery

Modern slavery is a crime where people are exploited and treated as commodities for commercial gain. It includes slavery, servitude, forced labour and human trafficking. It is a global problem of which the full extent is unknown.

The United Nations 2030 Sustainable Development Goals states within Goal 8 - Decent Work and Economic Growth - a target that includes a focus to 'take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking...'

Shoosmiths is committed to playing its part to help effect change.

Our supply chain entails the purchasing of goods and services that support the operations of our offices and services to our clients. These include office supplies, marketing materials, ICT hardware and software, estate services such as cleaning, waste management, office design, office fixtures and fittings during fit out, refurbishments and maintenance, uniforms and catering, hospitality services such as hotels for conferences and training events, security and couriers as well as recruitment agents and temporary staff provision. We purchase professional services and work with other law firms and legal experts, court services and enforcement, tracing agents, vehicle recovery agents, medical professionals and financial advisors and title indemnity insurance policies from insurance companies and brokers.

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. Our supplier purchasing policy and guidelines underpins our supplier selection process and details a range of environmental, social and ethical issues including slavery and human trafficking for consideration as part of the supplier selection process.

Our priority suppliers are invited to sign up to our Supplier Code of Conduct covering laws and regulations, under age and forced labour, freedom of association, discrimination, wages and benefits, working hours, healthy and safe working conditions, environment, business integrity, discipline and grievances.

We updated our procedure on compliance with the Modern Slavery Act Duty to Notify Regulations in June 2017.

Shoosmiths was part of the Law Society advisory group for the development of the Modern Slavery Act and Section 54 practice note published December 2016. This brings together legal requirements contained in the Modern Slavery Act, Bribery Acts and other legislation, and gives solicitors specific advice and examples of best practice for acting as a trusted adviser assisting their clients in meeting their anti-slavery obligations and managing their supply chains, as well as in their own firms.

Due diligence and risk assessment - employees

Our employment strategy is based on attracting, developing and retaining the best talent by reinforcing our values and providing a stimulating and rewarding work environment. We recognise everyone is unique and has special contributions to make in delivering the Shoosmiths strategy. Employee engagement is at the heart of our approach and we want to inspire and empower our people to use their talents positively in our communities, whether that be locally, regionally, nationally or ultimately at a global level.

Our recruitment and employment procedures include appropriate pre-employment screening of all staff to determine right to work in the UK where all our offices are based.

Due diligence and risk assessment – suppliers

Nominated individuals in our practice groups and business directorates have been briefed on our updated Modern Slavery Act Duty to Notify procedure. This details:

- background to the scale of the problem globally, regulations and our legal requirements;
- guidance on how to assess level of risk and therefore selection of priority suppliers for engagement on an annual basis or if a risk arises that requires investigation. Priority considerations can include:
 - o sourcing from or operating in countries of high risk;
 - high risk sectors where cases are frequently reported;
 - labour intensive stages of supply chain where the end product is cheap;
 - sub contracted labour forces;
 - low skill employment used;
 - transaction risks;
 - significant values of spend or significant strategic value;
 - contracts coming up for renewal;
 - material change in the supplier's business e.g. merger, acquisition, significant operational changes;
 - o if an incident has occurred or a potential incident identified; and
 - previous responses warranting follow up
- invitation for priority suppliers to sign up to the Shoosmiths supplier code of conduct and to provide information on:
 - countries goods/services sourced from;
 - o review of operations and supply chain during last twelve months;
 - any instances of slavery/human trafficking identified;
 - any remediation programme in place if instances found;
 - any third party accreditations in place to check slavery/human does not exist in supply chain;

- details of supplier's slavery and human trafficking statement if an obligated organisation; and
- o approaches to other high risk sustainability issues
- Employee and employer procedure in the event of an incident of slavery or human trafficking identified and working with supplier to help victims and mitigate risk in the future.

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 trafficking during the year but will investigate any allegations should they arise and take appropriate action accordingly.

Internal engagement

We raise awareness amongst our staff about slavery and human trafficking which this year has included firm wide briefings and articles on our external facing CR blog SHOUTback.

E learning training is made available to nominated individuals within each practice group and business directorate overseeing compliance with our slavery and human trafficking requirements. The e learning training covers four modules providing an introduction to modern slavery, what are the signs, action to take and an assessment of understanding.

As at 11 September 2017 156 suppliers had signed up to our supplier code of conduct.

External engagement

In addition to our involvement with the United Nations Global Compact and the Law Society activities during the last twelve months have also included:

Modern Slavery Act advice and training have been provided to clients by our regulatory, employment and commercial teams including board briefings, compliance checklists, amending contracts to include antislavery 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 drafting, reviewing and amending supply chain documentation, anti-slavery policies, procedures and supplier codes of conduct, audit questionnaires and s.54 transparency statements. Our employment/immigration team also advises on prevention of illegal working policies and procedures, carrying out prevention of illegal working audits and provides training for staff undertaking checks on illegal working.

We have spoken at a number of events during the year including:

Client supply chain briefings;

Business in the Community - East Midlands - convened workshop 8 March 2017 for businesses and community organisations;

Law Society One Year on debate; and

Westminster Legal Policy Forum Keynote Seminar 20 June 2017 - tackling modern slavery in the public and private sectors - prosecution, protection, prevention.

Shoosmiths is committed to better understanding its supply chains and collaborating with stakeholders who wish to improve transparency and address incidents of slavery or human trafficking. This applies not just to our own practices but also to the identification of opportunities in wider society where we might be able to make a difference.

Our second annual slavery and human trafficking statement is located on our Shoosmiths landing page **here** and our Access Legal Solicitors landing page **here**.

Diversity and inclusion

To thrive as a law firm we need difference. Difference of thought and perspective, difference in perception and approach to challenges. Our diversity and inclusion mission aims to help attract and nurture a diverse group of staff and to create an environment and culture that is genuinely inclusive, where every member of staff feels valued for their contribution to the firm. 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.

We have an excellent track record and have achieved significant recognition for encouraging diversity in the legal profession. We were the first legal practice to gain a Gold Standard Equality Assured Recruitment (EQA) accreditation and we have regularly featured at the top of the Black Solicitors Network Diversity League Table. In 2015 our graduate recruitment team had received the Commendation for Diversity by LawCareers.net. We aim to build on that success.

We were the first top 100 law firm to achieve the Investors in People Gold Standard in 2011 and the first to be reaccredited in 2015. We continue to hold Gold Standard status after a re-accreditation audit in 2017.

Shoosmiths partners 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 were delighted to achieve gold standard status in July 2017. As part of our commitment to diversity we actively support initiatives to attract minority groups to the legal profession. We partner with groups such as Birmingham Black Lawyers, Aspiring Solicitors, Women in Law and Black, Asian and Minority Ethnic (BAME) schools. 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 placement scheme to those who wish to pursue a career in law with 42 places provided during 2016/2017. We also provide work shadowing opportunities of up to three days for those who have not made a decision but wish to experience a legal work environment, with 67 places provided in 2016/2017.

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.

We are an accredited Diversity Confident employer, which demonstrates 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 help staff to position work in an appropriate place in their lives, enabling them to balance personal commitments and work demands. Our policies include;

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

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.

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.

We are also a founding signatory of the Law Society Pro Bono Charter. 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. The purpose of the Charter is to help practices to plan and structure their pro bono work, record and measure their pro bono hours and provide opportunities to share best practice advice and guidance with colleagues from across the professions. Signatories also commit to a biennial collection of anonymised data.

Pro bono advice is undertaken as a consequence of approaches by organisations and individuals, via charity trustee roles, through legal adviser connections, by pre-appointment based pro bono clinics and via brokered

programmes managed by charities. Hours recorded by legal advisers are included with their 'matter-related' targets (targets relating to billable hours), meaning pro bono hours count towards achieving these targets. 1,119 pro bono hours were recorded during 2016/2017, representing a 4.8% decrease on the 1,176 hours recorded in 2015/2016. During 2017/2018 we will continue to focus on more accurate recording of pro bono hours, encouraging legal advisers to undertake appropriate work and publicising outcomes of support provided.

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

Basingstoke Citizens Advice

In 2016/2017 we supported seven clinics advising on such issues county court judgements, divorce, guarantor and housing issues.

Business in the Community (BITC) ProHelp

We support BITC's ProHelp scheme in the East Midlands (our Nottingham office) and West Midlands (our Birmingham office).

Cases taken on during the year included providing advice on matters relating to lease renewal, repairing obligations and an advice note for a school.

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 handson legal work for the benefit of the community. During 2016/2017 eight clinic sessions were supported, assisting clients in both family and property dispute cases. The supervising solicitor attends the meeting between the client and the student adviser and thereafter assists with and carries out a revisal of both an initial letter setting out the facts of the case and the advice that is then issued to the client, as well as assisting the student to address any follow up questions the client may have following the advice.

LawWorks

We support appointment based pro bono clinics based on the LawWorks model 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 10 clinics supporting 37 clients on a variety of issues such as employment, consumer and landlord/tenant. In addition we made a donation of £500 to support CommuniCare's home visit service. The service was established to support the growing number of people needing support but unable to leave their homes, whether because of their own health or because they are caring for someone. The £500 donation would enable an adviser to cover 24 home visits during a three month period.

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 31 clients at 12 monthly advice clinics on a variety of matters such as family, probate, employment, landlord and tenant, neighbour disputes and general civil matters. We also made a £500 donation.

LawWorks Not-For-Profit Programme

We support the LawWorks Not-For-Profits Programme which delivers free legal advice to charities, voluntary and community organisations and social enterprises. During 2016/2017 real estate advice was provided to six charities advising on new lease reviewing and negotiations, acquiring premises, lease reviews, acquiring premises, tenant rights and a review of heads of terms for a tenancy at will.

Other pro bono work

Other community organisations that legal advisers helped last year included Action *against* Medical Accidents, Birmingham Employment Rights Advice Line, Counselling & Family Centre, Families Need Fathers, Lowry Trust, RNIB and St Paul's Community Trust.

During 2017 we published 253 legal updates on our Shoosmiths website and articles relevant to the human rights and labour agenda covered such issues as:

Anti-slavery statement: http://www.shoosmiths.co.uk/client-resources/legal-updates/drafting-an-anti-slavery-statement-what-not-to-do-13490.aspx

Apprenticeship levy: http://www.shoosmiths.co.uk/client-resources/legal-updates/the-apprenticeship-levy-the-unknown-opportunities-12559.aspx

Bereavement leave: http://www.shoosmiths.co.uk/client-resources/legal-updates/bereavement-leave-greater-rights-for-parents-13125.aspx

Disability: http://www.shoosmiths.co.uk/client-resources/legal-updates/disability-discrimination-are-multiple-choice-tests-fair-12830.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/disability-discrimination-is-type-2-diabetes-a-disability-12485.aspx

Discrimination: http://www.shoosmiths.co.uk/client-resources/legal-updates/compensation-for-discrimination-has-been-increased-13358.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/Law-Commission-calls-regulation-retirement-housing-12707.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/dressing-down-discrimination-in-the-workplace-12517.aspx

Gender pay reporting: http://www.shoosmiths.co.uk/client-resources/legal-updates/gender-pay-practical-steps-reporting-13678.aspx

http://www.shoosmiths.co.uk/client-resources/legalupdates/gender-pay-reporting-government-website-now-live-12858.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/gender-pay-reporting-final-version-of-acas-guidance-12714.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/gender-pay-day-new-regulations-in-force-12702.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/public-sector-gender-pay-report-regulations-published-12389.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/gender-pay-checklist-decisions-to-be-made-now-12298.aspx

General Data Protection Regulation: http://www.shoosmiths.co.uk/client-resources/legal-updates/gdpr-less-than-6-months-left-13579.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/the-data-protection-bill-are-you-ready-13296.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/gdpr-general-overview-13282.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/hr-and-gdpr-data-protection-impact-assessments-dpia-13242.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/hr-and-gdpr-new-concepts-13150.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/hr-gdpr-changing-employment-contracts-and-policies-13115.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/hr-and-gdpr-how-will-datasubjects-rights-change-13012.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/cloud-providers-how-forthcoming-gdpr-will-affect-you-12894.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/hr-and-the-gdpr-how-is-consent-changing-12836.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/hr-and-the-gdpr-how-do-employers-carry-out-a-dp-audit-12827.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/hr-and-the-gdpr-where-do-we-start-12797.aspx

http://www.shoosmiths.co.uk/client-resources/legalupdates/employers-are-you-ready-for-the-new-eu-data-protection-12753.aspx

Harassment: http://www.shoosmiths.co.uk/client-resources/legal-updates/acas-guidance-on-sexual-harassment-13563.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/metoo-sexual-harassment-in-the-workplace-13494.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/when-workplace-banter-become-sexual-harassment-12458.aspx

Immigration: http://www.shoosmiths.co.uk/client-resources/legal-updates/business-immigration-guidance-record-keeping-13639.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/employing-non-eea-migrants-13562.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/business-immigration-series-3-civil-penalty-notices-13377.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/tupe-transfers-effect-migrant-workers-13325.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/business-immigration-series-1-right-to-work-checks-13203.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/immigration-bill-announced-queens-speech-12948.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/sponsoring-migrant-workers-costs-to-rise-from-april-2017-12539.aspx

Mental health in the workplace: http://www.shoosmiths.co.uk/client-resources/legal-updates/spotlight-on-mental-health-in-the-workplace-12861.aspx

National minimum wage: http://www.shoosmiths.co.uk/client-resources/legal-updates/national-minimum-wage-retailers-under-the-spotlight-12917.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/national-minimum-wage-are-you-compliant-12488.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/new-national-minimum-wage-rates-announced-12474.aspx

Same sex marriage and pensions: http://www.shoosmiths.co.uk/client-resources/legal-updates/same-sex-marriage-and-pensions-walker-v-innospec-13103.aspx

Vulnerability: http://www.shoosmiths.co.uk/client-resources/legal-updates/21-questions-21-steps-new-guidance-on-vulnerability-12641.aspx

We also provide e learning courses on a range of topics including:

Data protection and GDPR compliance: http://www.shoosmiths.co.uk/client-resources/data-protection-10023.aspx

Equality and diversity: http://www.shoosmiths.co.uk/client-resources/equality-and-diversity-10044.aspx

Modern slavery - transparency in supply chains: http://www.shoosmiths.co.uk/client-resources/modern-slavery-transparency-in-supply-chains-10718.aspx

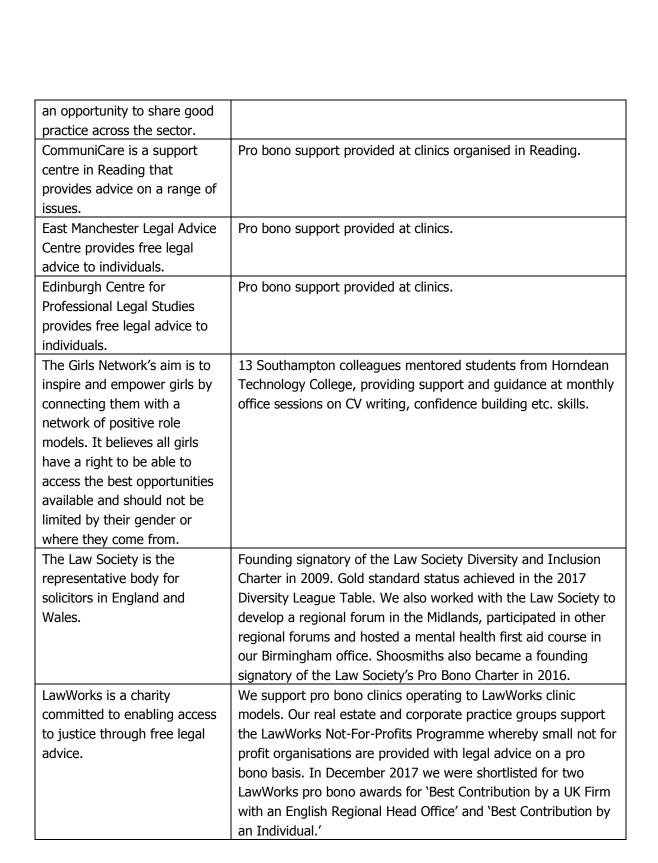
Prevention of illegal working: http://www.shoosmiths.co.uk/client-resources/prevention-of-illegal-working-13187.aspx

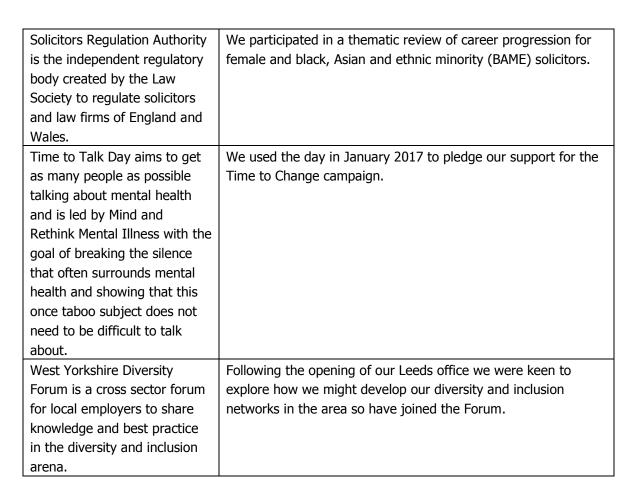
Recruiting fairly: http://www.shoosmiths.co.uk/client-resources/recruiting-fairly-10019.aspx

4b. Organisations we have worked with

In addition to fundraising during the year for a number of organisations focused on aspects of human rights or labour we also participated in:

Organisation	Activity
Aspiring Solicitors is an organisation committed to increasing diversity in the legal profession.	As an affiliate member we hosted four skills workshops in various Shoosmiths office locations. Internally we offer legal advisors the opportunity to become a Professional Ambassador. Each Professional Ambassador has a profile on the Aspiring Solicitors website which seeks to inspire users that they can enter the legal profession and that people are serious about increasing access to the profession across underrepresented groups.
Business in the Community is a business led charity with the ethos of building a fairer society and a more sustainable future.	We are a corporate member of BITC, a member of the East Midlands Advisory Board and support a number of programmes including the literacy programme and the East and West Midlands ProHelp scheme. Supported events included speaking at a slavery and human trafficking workshop, being featured in the guide 'Future Proofing Youth Recruitment' and asking BITC to organise a volunteering task for our Operations Board at Ackers Adventure Activity Centre.
Citizens Advice provides advice to people on a wide range of problems.	Pro bono support provided at clinics for individuals organised in Basingstoke and Northampton.
City, Legal Sector Diversity and Inclusion Forum provides	Shoosmiths is a member.





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

Appendix 2 of our annual CR Reports includes key performance data from 2013/2014 onwards relating to number of partners, personnel by management grade, full and part time employees, number of promotions at each grade, work shadowing placements, employees by gender, ethnicity, sexual orientation, age, religion or belief, socio-economic background: school and higher education, pro bono and volunteering hours.

Targets	Performance and status with further details in our 2016/2017 annual CR Report	
Review purchasing policy and guidelines and identify opportunities to improve how diversity and inclusion are considered through the supply chain.	Policy reviewed April 2017.	In Progress

Appoint a Diversity, Inclusion and Wellbeing Manager.	Appointed 1 May 2016.	✓
Review and implement an updated diversity and inclusion in the workplace strategy highlighting goals and protected characteristics of focus.	See the diversity and inclusion section of our CR Report.	✓
Identify and work with appropriate external interested parties to progress diversity, inclusion and wellbeing within the firm.	See the diversity and inclusion section and appendix 4 of our CR Report.	✓
Review and implement an updated wellbeing strategy across the firm that staff perceive enhances their working experience.	See the wellbeing section of our CR Report.	✓
Offices to support appropriate community, environment, health and safety, diversity and inclusion and wellbeing campaigns.	Examples provided in the workplace, environment and communities sections plus appendix 4 of our CR Report.	√
Establish a new employee recognition process for staff advising vulnerable adults.	All specialist staff received recognition for being 'Go To' people with the award of vouchers last year.	√
Consider potential for expanding formal pro bono services provided by legal advisers.	Two new services were investigated in our Birmingham and Leeds offices which subject to approval will be launched during 2017/2018.	In Progress
Flexible working to be promoted as an accessible benefit for all staff through the introduction of a range of options.	Our approach to flexible working has been superseded by our wider approach to agile working. See the environment section of our CR Report.	√

4d. Our 2017/2018 human rights and labour targets

- Develop a wellbeing policy and raise awareness of mental health and appropriate support;
- Continue to develop our work on diversity and inclusion including addressing the gender imbalance in senior roles;
- Continue to provide focus for Shoosmiths colleague volunteering programme which enables colleagues to use their professional and personal skills to address social challenges in communities where we operate; 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.

Our environment programme for the period 2016/2019 concentrates on:

- striving to achieve balance in the three pillars of sustainability environment, society and the economy; and
- working with our suppliers to improve our sustainability performance;

Our responsible business policies include:

Energy policy
Environment policy
Waste management policy

The most material issues for our business are: procurement and resource use; energy consumption and carbon emissions associated with our buildings, IS systems and employee travel; and waste and recycling. Solutions lie in the management of our operations, investment in new, and alternative technologies, working with our suppliers and encouraging behavioural best practice across our teams.

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.

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.

Shoosmiths operates an incident reporting system which includes environmental incidents. No environmental incidents were recorded during 2016/2017.

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' BREEAM (Building Research Establishment Environmental Assessment Methodology) rating as does the new Manchester office occupied from June 2017. The Apex Plaza building (multi-tenanted), Reading is ISO 14001 certified.

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 2016/2017 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 one day site audits of our Birmingham (multi-tenanted) and Thames Valley (multi-tenanted) offices to assess environmental legislative and best practice compliance. We also used a consultancy to advise on the environmental aspects register component of our environmental management system.

Agile working

Agile working brings 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 and incorporates different working methodologies, processes and procedures and different working styles including mobile, home and flexible working.

The Reading pilot was undertaken between May and September 2016 and the Manchester agile working roll out was completed June 2017. Supported by an IS infrastructure that provides total flexibility in connecting anywhere with our clients agile working has demonstrated the capacity for change and employee enthusiasm that embraces new ways of working. Agile working has also resulted in greater collaboration across all practice groups and enabled employees to choose how they can best service their clients.

From September 2016 a refurbishment programme commenced at the Lakes office in Northampton which is scheduled to be completed by April 2018. Refurbishment includes heating, lighting and ventilation changes and trialling a new desk layout working environment in conveyancing. Environmental improvements include replacing our water based air conditioning system with a dry air based system which when fully commissioned is anticipated to reduce energy consumption by 30% and the elimination of business disruption due to potential flooding.

In October 2016 we moved from Quantum House to the top floor of the Square Building in Basingstoke. In December 2016 we opened new offices in Belfast and Leeds and in London in April 2017 we relocated from Tower 42 to the 6th floor of St. Martin's Le Grand in support of our continued growth plans over the next two to three years.

During 2017/2018 we will move to new offices in Leeds and Southampton, both of which will be fitted out to support agile working. We are also trialling the implementation of a variation of agile working that will focus on changing the way existing space is used to maximise its utilisation. This will be supported by the roll out of paper light working. By the end of April 2018 we aim for 60% of our employees to have transitioned to agile working and 50% of our offices converted to support task working.

Resource management

During 2016/2017 there was a continued focus on paper light working which reduces dependency on paper and encourages best practice processes across teams with each practice group and directorate being tasked with establishing soft filing protocols.

Agile working arrangements reinforced minimal paper production and electronic document storage practices.

To support this change, predictive email filing (PEF) was introduced, staff training was undertaken and a full roll out schedule produced.

As a consequence we saw our printed sheets consumption reduce by a further 8% to 28 million pages. (In 2015/2016 we had achieved a 28% reduction to 31 million sheets). During 2017/2018 our aim is to reduce printed page volumes by a further 5% versus 2016/2017 which would equate to a reduced annual volume of 26.4 million sheets.

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 2017/2018.

During 2016/2017 Shoosmiths used 1,067 lines of stationery, of which 286 have a defined environmental benefit. Of these lines, 80 products have 100% recycled content and 87 partial recycled content. We used 6 FSC certified paper products, which constituted about 98% of our paper spend.

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

Donation of used IT 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 redundant 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.

During 2016/2017, 652 IT assets were donated (4,451 kg) to Computer Aid. Of the 652 items donated 367 units were re-used (2,513 kg) and 285 (1,938 kg) were recycled with the re-used assets sent to four projects in Africa. (40% to Kenya, 21% to Zimbabwe, 21% to Sierra Leone and 18% to Ethiopia). 0% of assets went to landfill as Computer Aid's downstream partners operate a manual disassembly process, breaking down items to their constituent parts which are then sent to specialist refiners for re-use and recycling.

Kisii University, Kenya – Computer Aid has developed a scheme to enable university students to access technology during their studies and at home using laptops. Most of the students have never received

educational IT training before university and require extra training to learn basic software packages such as Word, PowerPoint and Excel in order to complete their homework and become employable upon graduation.

Shoosmiths' computers have played a huge role in decreasing student to PC ratios at the university, enabling more students to apply to their studies.

World Links hub, Zimbabwe - Computer Aid's hub World Links distributed Shoosmiths computers to primary and secondary schools immediately before the examination period so that more PCs would be available to students taking their IT exams.

E Class Project in partnership with Njala University, Sierra Leone – Computer Aid partnered with Njala University to equip 10 primary schools with computers in the classroom for the first time. Through the partnership students and teachers will receive ICT training from the university, supporting the integration of IT into the schools' curriculums.

Ethiopian Knowledge and Technology Transfer Society (EKTTS) - Computer Aid sent our used equipment to EKTTS, its Ethiopian partner hub which works with local government to set up IT labs in primary and secondary schools across the country.

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 2016 and April 2017 we consumed 29,541 litres of water and avoided 5.33 tonnes of glass (equivalent to 2,461 containers) 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. We track electricity and gas consumption at our offices through monthly reporting. Our electricity consumption unfortunately increased by 7.62 % during 2016/2017 across the estate. Our gas consumption however, reduced by 16.37% at sites we control. Energy consumption within our business must continue to be a focus, and new improvement opportunities identified.

All major IT projects undertaken are reviewed against a number of criteria including energy ratings, avoiding high energy rating alternatives.

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 a newly qualified driver 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 2016/2017, 20 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, Belfast, Edinburgh, Leeds, London, Manchester, Milton Keynes, Nottingham and Reading), 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 2016/2017, these offices produced 74.76 tonnes of general waste. Of this total zero waste was sent to landfill, 15.42 tonnes were recycled, 33.07 tonnes were recovered via energy recovery facilities or waste to energy and 26.27 tonnes recovered via Refuse Derived Fuel. (This compares with 96.64 tonnes of waste produced in 2015/2016 of which 87% was recycled of which 57% incinerated with heat recovery and 13% landfilled due to contamination issues). (Basingstoke data was available until the office move whereupon waste collections were included as part of landlord services for the new office).

FISco also manages confidential waste from all our offices, with the exception of Belfast, through a specialist company, Shred It, with 158.13 tonnes collected in 2016/2017. (Compared to 154.02 tonnes collected in 2015/2016). The waste was shredded and recycled into the approximate equivalent of 186.62 tonnes of recycled fibre - tissue and toilet paper. By recycling confidential waste 466.54 m³ of landfill space was avoided. We continue to focus effort to improve accuracy of recording waste.

All archived paper material that is deemed no longer required for storage is security shredded via Smurfitt Kappa and the material recovered. 52.8 tonnes was collected from Shoosmiths in 2016/2017 and recycled into cardboard, toilet paper and writing paper.

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.

Appendix 2 of our annual CR reports include data on our annual water consumption in buildings at locations under Shoosmiths control, namely Basingstoke (until October 2016), Northampton (Lakes and Victoria House premises) and Southampton.

5a. Helping our clients

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

Clean growth: http://www.shoosmiths.co.uk/client-resources/legal-updates/clean-green-growth-for-the-uk-13536.aspx

Energy: http://www.shoosmiths.co.uk/client-resources/legal-updates/energy-savings-legal-requirement-not-voluntary-12664.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/guidance-energy-efficiency-standard-published-12598.aspx

Environmental claims: http://www.shoosmiths.co.uk/client-resources/legal-updates/environmental-claims-neednt-cost-the-earth-13456.aspx

Environmental impact assessments: http://www.shoosmiths.co.uk/client-resources/legal-updates/changes-to-environmental-impact-assessment-regime-12813.aspx

Fracking: http://www.shoosmiths.co.uk/client-resources/legal-updates/fracking-up-the-pressure-chapter-2-12736.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/hydraulic-fracturing-the-third-way-12481.aspx

Housing: http://www.shoosmiths.co.uk/client-resources/legal-updates/sustainability-in-the-housing-white-paper-an-afterthought-12535.aspx

Invasive non-native species: http://www.shoosmiths.co.uk/client-resources/legal-updates/a-knotty-problem-12778.aspx

Minimum energy efficiency requirements for residential investment property:

http://www.shoosmiths.co.uk/client-resources/legal-updates/minimum-energy-efficiency-for-residential-property-13432.aspx

Pollution: http://www.shoosmiths.co.uk/client-resources/legal-updates/the-polluter-doesnt-always-pay-13234.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/uncertainty-ahead-for-the-contaminated-land-regime-13033.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/record-20-million-fine-for-water-pollution-offences-12683.aspx

5b. Organisations we have worked with

In addition to donations to environmental focused organisations we also participated in:

Organisation	Activity
Computer Aid International	In 2016/2017 652 items were sent to Kenya, Zimbabwe,
is a charity that procures	Sierra Leone and Ethiopia 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 set	climate change principles for which we provided a progress
up by the Law Society of	report during 2017 and submission to the 2017 LSA Carbon
law firms and organisations	Footprint Protocol Report.
committed to working	

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	25 March 2017 by switching off unnecessary lights and
degradation of the planet's	equipment and we organised a staff awareness competition.
natural environment.	There were two common themes expressed about why it is
	felt important that Shoosmiths plays its part in tackling
	climate change a) relating to our size and leadership
	aspirations and b) in how it can help us retain and attract
	new clients.

5c. Our 2016/2017 environment targets

Appendix 2 of our annual CR Reports includes key performance data from 2013/2014 onwards relating to carbon footprint, electricity and gas consumption, waste and water consumption.

Targets	Performance and status with further details in our 2016/2017 annual CR Report	
At sites where we control building	+7.62% increase in electricity	×
energy use reduce electricity	consumption across the estate.	
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	-16.37% decrease in gas consumption	✓
energy use reduce gas consumption by	across the estate.	
3% in 2016/2017 versus 2015/2016.		
Where we do not control the building		
liaise with the landlord to identify		

		1
opportunities to reduce gas		
consumption.		
Implement appropriate opportunities	All short term measures have been	✓
identified during Energy Savings	completed. Medium term measures at	
Opportunity Scheme audits undertaken	our Lakes and Solent offices have been	
in 2015.	put on hold until the Lakes	
	refurbishment works have been	
	completed 2018 and the Solent office	
	move in 2018. The next ESOS review	
	will start in 2018 focusing on those	
	properties where we have significant	
	control and can implement a range of	
	cost saving measures.	
Review potential to source electricity	Review was undertaken in September	x
from renewable sources at sites under	2016 but price differential was	
Shoosmiths' control subject to pricing	exceeded. Next potential review	
objectives being satisfied.	opportunity for any non-serviced	
	buildings will be August 2018.	
Using an external organisation, establish	Completed with site audits undertaken	✓
an environmental aspects register and	at our Birmingham and Thames Valley	
procedure, and conduct a second party	offices.	
audit of two offices to assess legislative		
and best practice compliance, identifying		
opportunities for improvement.		
Review business continuity planning to	Completed. See the business continuity	✓
strengthen business resilience and	programme section of our annual CR	
capacity to climate-related hazards and	Report.	
natural disasters.		<u> </u>

5d. Our 2017/2018 environment targets

- At sites where we control building energy use reduce electricity consumption by 3% in 2017/2018 versus 2016/2017. 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 2017/2018 versus 2016/2017. Where we do not control the building liaise with the landlord to identify opportunities to reduce gas consumption;
- By the end of April 2018 transition 60% of our employees to agile working and convert 50% of our offices to support task working;
- Reduce printed page volumes by 5% 2017/2018 versus 2016/2017; and

 Using an external organisation conduct a second party audit of two offices to assess legislative and best practice compliance, identifying opportunities for improvement.

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.

Shoosmiths is fully compliant with the UK Bribery Act 2010 and during the last 12 months has not been subject to any investigation, legal claim or criminal action.

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: 2015 (following a transition in 2017 from ISO 9001:2008 and we have been 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 on an annual basis.

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 our other statutory obligations.

Our policies cover such issues as anti-money laundering, data protection, information security, anti-bribery and corruption, gifts and hospitality, information security, quality and risk management and supplier management procedures. All colleagues complete regular training and testing 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 plus anti-money laundering and data protection courses as well as a number of other courses.

During 2016/2017, we updated our policy on gifts and hospitality, introducing new limits above which hospitality needs approval, which is kept under review. We reviewed our Anti Money Laundering (AML) and Counter Terrorist Financing (CTF) procedures to reflect the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.

Our supplier code of conduct sets out our supplier expectations regarding under age and forced labour, freedom of association, discrimination, wages and benefits, working hours, healthy and safe working conditions, environment, business integrity, discipline and grievances.

Whistleblowing

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 requirements set out in the FCA's Senior Management Arrangements, Systems and Controls (SYSC) 18, in relation to the Public Interest Disclosure Act 1998.

Staff are encouraged 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 Northern Ireland, unauthorised disclosure of confidential information and deliberate concealment of any of the above matters.

6a. Helping our clients

We have published a number of anti-corruption legal updates: http://www.shoosmiths.co.uk/client-resources/legal-updates/update-on-psc-regime-changes-13055.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/psc-registers-aim-companies-must-comply-13047.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/more-changes-to-the-psc-regime-12852.aspx

http://www.shoosmiths.co.uk/client-resources/legal-updates/proposals-register-overseas-entities-owning-uk-property-12710.aspx

We also provide an e learning course on anti-corruption:

Anti-corruption: http://www.shoosmiths.co.uk/client-resources/anti-corruption-10052.aspx

6b. Our anti-corruption targets

As a firm of solicitors regulated by the Solicitors Regulation Authority, the Law Society of Scotland, the Law Society of Northern Ireland 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.

Shoosmiths has a zero tolerance policy to bribery and corruption. All gifts and hospitality in excess of certain minimum levels must be reported to the Quality and Risk team in accordance with the gifts and hospitality policy and employees are reminded of their obligations. We will continue to remind employees of these

requirements. If there are concerns about a proposed gift or hospitality the Quality and Risk team will discuss these with the employee and the relevant partner. It is proposed to give the gift and hospitality register greater visibility in 2017/2018 with changes to the Quality and Risk intranet pages.

January 2018