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# URÍA MENÉNDEZ

Supplier Code of Conduct

1 December 2019

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# 1. Purpose and scope

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Since it was founded in 1946, Uría Menéndez Abogados, S. L. P. (“**UM**”) has been a leading law firm at both a national and international level. We provide legal services to our clients pursuant to our core principles of honesty, decency, respect for professional conduct rules and the law.

UM is committed to maintaining the highest standards and our suppliers (“**Suppliers**”) play a vital role in safeguarding our values and principles. We therefore seek to establish relationships with our Suppliers based on trust, mutual benefit and respect for free competition.

This Supplier Code of Conduct (“**Supplier Code of Conduct**”) sets out the minimum standards that Suppliers are expected to meet when working with UM. They are grouped into four areas in accordance with our commitment to the Ten Principles of the United Nations Global Compact:

- (i) human rights;
- (ii) working practices;
- (iii) environmental responsibility; and
- (iv) professional ethics and compliance.

This Supplier Code of Conduct applies to all of UM’s Suppliers. A Supplier is any natural or legal person, or other legal entity, who in a professional capacity sells goods or provides services that are not directly related to UM clients or professional matters, regardless of the Supplier’s nationality or where the services are provided.

This Supplier Code of Conduct should be read in conjunction with the provisions regulating the contractual relationship between a Supplier and UM. Suppliers must expressly undertake to abide by this Supplier Code of Conduct before signing a contract with UM.

UM periodically reviews this Supplier Code of Conduct and amends it as necessary. Suppliers must be familiar with its content at all times ([www.uria.com](http://www.uria.com)) and must ensure that their employees and the third parties they engage to perform services for UM are familiar with, and abide by, this Supplier Code of Conduct.

## 2. Core areas

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### 2.1. HUMAN RIGHTS

We are committed to promoting and respecting human rights in our relationships with Suppliers and, to that end, expect Suppliers to do the same.

### 2.2. WORKING PRACTICES

Suppliers must ensure that they offer fair working conditions and must

- respect their employees' rights to freedom of association and collective bargaining;
- not use forced or compulsory labour;
- not engage in or tolerate child labour;
- ensure that the workplace is free from discrimination based on gender, race, religion, political affiliation and sexual orientation; and
- comply at all times with health and safety regulations.

### 2.3. ENVIRONMENTAL RESPONSIBILITY

Suppliers must protect the environment and adopt eco-friendly practices.

### 2.4. PROFESSIONAL ETHICS AND COMPLIANCE

Suppliers must comply with all the applicable regulations and endeavour to meet international standards, regardless of whether they apply in their countries of origin or in the country in which they provide their services.

Suppliers must pay particular attention to the following matters, among others:

#### **2.4.1 Anti-corruption**

Suppliers must ensure that they do not commit acts of corruption or bribery, such as influence peddling or making facilitation payments, in their own name or for their own benefit or in the name or for the benefit of UM, vis-à-vis third parties, whether they are individuals, public authorities, civil servants or other public workers, national or foreign, or vis-à-vis UM or anyone who works at UM.

UM outright rejects any conduct aimed at altering the objective decision-making of persons with whom we have dealings, whether in the public sector (national or foreign) or private sector. UM has a zero-tolerance policy towards all forms of corruption and bribery, and requires the same of Suppliers.

#### **2.4.2 Conflicts of interest**

Suppliers must act transparently and inform UM of any situation that gives rise to a real or potential conflict of interest. This includes any situation that may affect the objectivity of UM or our members when using the services of a Supplier.

#### **2.4.3 Anti-money laundering and countering terrorist financing**

Suppliers must collaborate with UM to combat money laundering and the financing of terrorism and, to that end, will hold themselves to the highest ethical standards when hiring employees.

#### **2.4.4 Confidentiality and data protection**

All information regarding UM, our members, clients or third parties with whom we collaborate is confidential.

Suppliers must store and keep confidential all the information they obtain or to which they, their employees or the third parties they engage have access in the course of providing their services to UM.

In addition, Suppliers will process the personal data to which they have access in the course of providing their services in accordance with UM's written instructions and the applicable personal data protection regulations. Unless Suppliers and UM agree otherwise, Suppliers will be data processors of the personal data to which they have access in the course of providing their services to UM. They must comply with Article 28 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free

movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), and must not use the data for purposes other than to provide the services.

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### 3. Compliance

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Suppliers must carry out internal Supplier Code of Conduct compliance audits and inform UM of the results upon request.

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## 4. Contact

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Please send all questions regarding this Supplier Code of Conduct to UM's purchasing department at the following email address: [compras@uria.com](mailto:compras@uria.com).

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**MADRID**  
**PORTO**  
**VALENCIA**  
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**[www.uria.com](http://www.uria.com)**

Registro Mercantil de Madrid, Tomo 24490 del Libro de Inscripciones, Folio 42, Sección 8, Hoja M-43976,  
Inscripción 85. Denominación Social: Uría Menéndez Abogados, S.L.P. NIF: B28563963