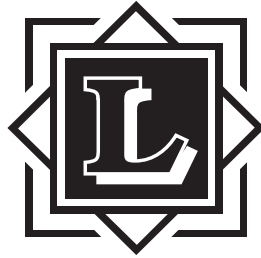


Legalease
Third Party
Undertaking



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Legalease Ltd

Legalease is a global leader in the provision of legal market information.

We provide authoritative in-depth analysis and research commentary on the provision of legal services worldwide. Our customers are primarily corporate clients and the law firms that service them.

Our business relies on trusted, professional relationships with law firms and their clients. We demand the highest standards of integrity and good faith from all our employees and third-party suppliers. The purpose of the company is to provide objective, wholly independent analysis of the global legal market.

We are proud that Legalease is independent, impartial, and international.

Legalease is a traditional private business, NOT owned and run by private equity, where the aim is to provide the best information and data for the international legal community.

Our goal is not short-term profit but long-term professional excellence.

Legalease Third Party Information Undertaking

The Legalease Third Party Undertaking ('Third Party Undertaking') sets out the company's minimum expectations regarding business conduct from third parties. Legalease asks third parties to meet identical standards of integrity and practice to those required of its own staff.

The Third Party Undertaking does not purport to be exhaustive, and should not be regarded as a substitute for third parties' own policies or accountability. Where necessary we encourage third parties to seek out appropriate guidance from Legalease staff on standards required to fulfill our commitment to this Third Party Undertaking.

Reporting

Legalease is committed to the prompt identification and addressing of any potential risks, vulnerabilities or violations of its Third Party Undertaking. We will protect all Legalease employees and third-party personnel from any form of retaliation for reporting their concerns in good faith, and we expect all third parties to report those concerns as quickly as possible either to the member of staff with whom they are engaged in partnership at Legalease, or to our dedicated communication channel, thirdpartyundertaking@legalease.co.uk, unless prohibited by law or regulation.

Where necessary Legalease will protect anonymity. Legalease will work with third parties where appropriate or necessary to escalate and/or investigate concerns or potential breaches of the Third Party Undertaking.

Compliance

Legalease is committed to ongoing monitoring and safeguarding of business conduct against the provisions of its Third Party Undertaking. We expect all third parties to comply with and support the policies set out in this Undertaking. Where any applicable local or international law add greater regulation or restriction than this Undertaking, those laws and regulations shall govern.

Where necessary we expect third parties to implement such policies, controls, and/or training to personnel as are deemed by the third party to be appropriate in order to comply with this Undertaking.

Where necessary or appropriate Legalease may conduct due diligence on third parties to assess their capacity to meet requirements set out in this Undertaking. We expect third parties to provide comprehensive and accurate information to facilitate such due diligence efforts where they are requested to do so.

Editorial independence

Legalease's global reputation as a reliable and trusted source of information on the world's best law firms relies entirely on the independence of its editorial commentary. As such, we will take all necessary steps to protect and enhance that independence, combat threats to it, and address identified vulnerabilities immediately and comprehensively.

Our independence is rooted in complete freedom from any relationships or interests which may obstruct Legalease's editorial objectivity or its ability to provide factual commentary on law firms.

In particular, Legalease constantly monitors collaborations or partnerships for conflicts of interest which may threaten Legalease's editorial independence and our ability to provide objective commentary or information.

On occasion, third parties may be asked to adjust or implement policies to allow Legalease to maintain that editorial independence, in the course of collaboration or partnership with Legalease on editorial-led projects. Legalease will offer guidance on what policies may be required and will inform relevant personnel of their responsibilities to ensure compliance.

Legalease requires third parties to inform Legalease immediately of any conflicts of interests they may have identified. Legalease will put in place such measures as are necessary or appropriate to manage any perceived or actual conflict of interest.

Good working relationships

Legalease is committed to providing a safe, constructive and non-discriminatory working environment for all employees and third parties working collaboratively or in partnership with us. We expect all third parties to work always to build good working relationships with all our staff and partners, and to provide a working environment free of abusive, threatening, disruptive or otherwise improper behaviour.

Legalease will take very seriously any allegation of bullying, threatening or antisocial behaviour of any kind. All complaints of harassment (including sexual harassment) will be treated with respect and in confidence, and no one will be victimised for making any such complaint. We expect all third parties to adopt a zero-tolerance approach to any such behaviour.

Child labour, human trafficking and modern slavery

Legalease strongly opposes any form of child labour, human trafficking or modern slavery. Legalease undertakes not to use child labour in any form, will only employ personnel who meet the applicable minimum legal age requirement to work in the country or countries in which they operate; and shall not engage in or support human trafficking or modern slavery, or any activity which may indirectly lead to human trafficking or modern slavery, including forced, bonded or involuntary labour. Legalease requires the same undertaking of all third party suppliers.

Employment practices

Legalease is committed to equal employment opportunities for all, and to compliance with all applicable wage, hour and overtime laws and regulations. We require all third parties not to discriminate against any individual on any grounds when employing or hiring staff either on a permanent or temporary basis, and to perform due diligence on any subsidiary suppliers to ensure that they do not discriminate.

All third parties shall set such working hours, wages and overtime pay as are compliant with applicable laws and regulations in the country or countries in which they operate. We expect third parties to resource all projects adequately to limit overtime to a level which promotes healthy and productive working conditions.

Anti-corruption and bribery

Legalease is one of the world's leading publishers of business information for law firms and clients, globally. We operate on an international level, our publications and events portfolio covering more than 170 countries and we pride ourselves on our reputation for acting fairly and ethically wherever we do business. Our reputation is built on our values as a company, the values of our employees and our collective commitment to acting with integrity throughout our organisation. Legalease and its Board condemn corruption in all its forms and will not tolerate it in our company nor in those we do business with.

Legalease's Code of Conduct and Company Handbook sets out how all employees are expected to behave and what action should be taken when confronted with corruption/bribery. We expect everyone to adhere to that guidance and its values, in all aspects of our day-to-day work. By extension we expect third parties to adhere to the same guidance and its values whenever engaged in partnership or collaboration of any form with Legalease.

Legalease's specific expectations in guarding against corruption may be considered to be as follows:

- If a Legalease employee or third party acting on behalf of Legalease has suspicions that the project they are working on is, or has been, affected by or is vulnerable to bribery or corruption, that suspicion should always be reported immediately.
- We expect to pay genuine prices for genuine goods and services, and will resist all approaches from agents who ask for especially large fees or commissions (who may do so in order to pay bribes on behalf of Legalease or its employers).
- Third parties are required not to accept or provide any gifts or favours from active or former government or state officials, or commercial parties, for or on behalf of Legalease without obtaining prior approval from Legalease.
- We expect all employees and third parties acting on behalf of Legalease to do so honestly and in good faith at all times and in all aspects of their work.
- We require accurate record-keeping (including all invoices and receipts) for all work undertaken on behalf of or by Legalease, especially in relation to the payments made and what they are for.

Fair competition

Legalease is committed to fair competition and will not tolerate activity that is or could be perceived to be anti-competitive in any form.

We expect all third parties to refrain from all anti-competitive conduct including but not limited to price setting, client allocation, artificial compensation or benefits.

All relevant or applicable antitrust and competition laws and regulations shall be accepted as applicable in all professional collaborations and relationships entered into between Legalease and any third party.

Data Protection

Legalease is strongly committed to the privacy and confidentiality of information relating to its clients, to the relationships between law firms and clients which form the basis for a large proportion of Legalease's research projects, and to individuals with whom it conducts business. Legalease uses robust IT infrastructure to ensure the security of all data and information, and policies and practice codes relating to the protection of that data take priority in all Legalease projects.

Legalease will never share confidential information, contact data or data which otherwise could identify individual clients or their associations or partnerships or working relationships without the permission of the individuals concerned. Third parties should not expect permission to view or handle the data of our clients without their express permission in any circumstances, such permission will never be granted.

We expect third parties to honour and respect our commitment to our client data privacy and protection, and to the confidentiality of information shared with us in good faith. Third parties may only handle or disclose information or data they obtain during the course of collaborative projects or relationships with Legalease as authorised by Legalease (and subject to all applicable laws and regulations).

The Legal 500 Data Commitment

“We will never pass, sell or otherwise transfer any submission information or any client referee data on to any third party, or use that data or information for any purpose other than research for The Legal 500.”

The Legal 500’s client research process is constantly updating to reflect and adhere to the latest legislation around the world on data protection and privacy, including GDPR guidance. We are committed to treating all client data with the highest possible sensitivity, and always in the strictest confidence. We go to great lengths to ensure data we handle is secure, that we only ask for essential, directly relevant data in the first place, and that we only retain any data at all for as long as is absolutely necessary.

We set out below some of the ways in which we protect client data and privacy.

Comprehensive terms and conditions for the transfer of submissions data between your law firm and The Legal 500 can be found at legal500.com/privacy-policy.

Why does The Legal 500 need this data?

Client referee data is used solely and exclusively for Legal 500 research processes. It is never used for any marketing purposes or sales campaigns of any kind. Contact information is used only for the purposes of sending clients our confidential survey, and to let them know when we have published our findings that year. Thereafter, **we delete it all immediately** – no exceptions.

NB: We will never pass, sell or otherwise transfer any submission information or any client referee data on to any third party, or use that data or information for any purpose other than research for The Legal 500.

GDPR COMPLIANCE CHECK LIST

- Data usage limited to specific purpose
- Data subject to personal data rights
- Appropriate consent obtained by design
- Data protection by design
- Data protection impact assessment performed
- Data protection offer in place
- No data transferred to third parties

How do we send our Client Referee lists and Submissions documents to The Legal 500 research team?

We require all firms to use the dedicated, secure, Legalease Portal. Because of security and confidentiality concerns, we no longer accept Client Referee lists or Submissions documents by email.

The Legalease Portal

This is a secure, password-protected, means of transferring data to The Legal 500 research team. Firms must pre-register.

Forgotten passwords can be auto-recovered. Late or amended submissions automatically over-write earlier submissions (so firms can be sure that any amendments will be available to The Legal 500 research team). Documents and spreadsheets are auto-checked for correct formatting (ensuring an incorrectly assembled file will not be rejected).

What Client Referee data do you ask for?

Identifiable information is deliberately restricted to the bare essentials required to contact the client.

We never ask for sensitive personal data, or for information not directly relevant to The Legal 500 client research process.

We ask for the following information:

- Name of client
- Name of company
- Industry sector
- Geographical jurisdiction of client
- Name of the law firm that is representing the client
- Email address of the client



Where does The Legal 500 store our data and how is it handled?

Data submitted via the Portal is temporarily stored in our secured site files, before being exported to secure Sharepoint locations. All source files are then deleted. We take all sensible precautions to ensure that our site files and client emails are secure at all times, and we only store any client research data in those systems for as long as is necessary. We operate a strict permissions policy to minimise access, with Research Team access being read-only (no file copying, printing or emailing). Nobody outside the client research support team has access to identifiable data or contact information for clients without their express permission.

Our research support team is based exclusively in the United Kingdom, and is made up only of direct employees of The Legal 500.

All Legalease staff are required to observe this Third Party Undertaking and The Legal 500 Privacy Policy (both form part of the employment obligations imposed on all Legalease staff). In addition, all staff working on The Legal 500 are required to sign an Annual Declaration confirming they will comply with both this Third Party Undertaking and The Legal 500 Privacy Policy, and that they have not copied or retained any third party confidential information.

How long is it stored for and when is it deleted?

We only store client information for the duration of the research period for the specific edition of The Legal 500 in question. As soon as we have alerted clients to the publication of the research, all identifiable and contact information is deleted immediately.

If, in the mean time, you or your clients request at any point to have specific information deleted from our records, for whatever reason, that request will be processed entirely and immediately.

Where can I find The Legal 500 Privacy Policy?

Our full privacy policy can be found at legal500.com/privacy-policy.

Jurisdiction

The presumed jurisdiction for all matters relating to regulation, governance and legislation for any partnership with Legalease will be the UK. Except where specifically agreed in advance with Legalease, and only then in exceptional circumstances, UK law will apply to any and all agreements between Legalease and all third parties.

Legalease is registered as a data-controller with the UK regulator (the Information Commissioner's Office – the ICO -registration number: Z321910X)

Health and safety

Legalease respects all relevant legislation regarding the provision of a safe working environment for all its staff, and we expect all third parties to make the same provisions. We require all third parties to commit to reducing the risk of health and safety incidents and accidents in the workplace, and to respond promptly where such incidents do occur. In particular we expect all third parties to provide adequate personal protective equipment (PPE) where appropriate.

In the light of the Covid-19 global pandemic, we are committed to following all local regulations and guidelines on protecting staff from infection and reducing the spread of the disease. This includes regulations on social distancing and PPE. We require all third parties to adhere strictly to the same guidelines and regulations in all circumstances.

Legalease is committed to monitoring the ongoing safety both of its personnel and clients, and those of third parties working collaboratively or otherwise in partnership with us. Legalease may suspend or terminate any working relationship in which it considers the safety of its staff or those of its clients or third parties is in any way compromised or threatened.

Liability

Legalease maintains adequate insurance cover for all projects it undertakes, including (but not limited to) all matters relating to events, travel, hospitality, health and safety, technology hardware and product liability. Legalease will not enter into separate undertakings with third parties regarding insurance coverage.

Legalease will not be liable to any third party in respect of any reputational loss or damage during or as a result of any collaboration on any project with the third party.

IT, hardware and software standards

Legalease only uses physical and virtual IT assets which meet the highest standards of security and function. All software is kept fully up-to-date, and we carry out regular penetration tests. We expect all third parties' security policies to match Legalease's requirements with regard to the deployment of all hardware or software in the course of any collaborative partnership with Legalease, or when using Legalease's data or information.

Where appropriate Legalease may undertake such due diligence as is necessary on a third party's digital infrastructure to ensure that it meets our standards for performance, reliability and security. We expect all third parties to provide comprehensive, accurate information to facilitate that due diligence on request. Where a security weakness is identified prior to or in the course of a collaboration with Legalease, we may require alterations to be made to systems that we believe fall short of our own standards.

Intellectual property

As well as respecting the valid intellectual property rights of other parties, Legalease will defend its own intellectual property vigorously. We expect all third parties to act in the same way. In particular, third parties may not use Legalease intellectual property or copyrighted content without the authorisation of Legalease.

Legalease maintains a number of registered trade marks. Third parties are required to use all such trade marks only with the express written authorisation of Legalease. Additionally, we require all third parties using Legalease's trade marked branding to do so without altering or adjusting any logos, brands or designs in any way without the authorisation of Legalease, and to seek and follow advice on appropriate design placement of any Legalease branding from their point of contact before using it in any digital or print output.

Legalease requires that all third parties refrain from using any Legalease published information or data in their own software, technology, published data or information of any other format without the express authorisation of Legalease.

Social media

Legalease staff are required to follow a dedicated code of conduct on the use of social media in the course of their work. In particular, we are committed to using social media platforms courteously and professionally, and always ensure that we are respectful in online communications. We have a zero tolerance policy on unprofessional, harassing, defamatory, discriminatory or otherwise prohibited activity on all social media activity.

We require all third parties to adhere to the same professional standards when using social media to communicate around any collaborative project or partnership with Legalease. We will not enter into partnership with third parties who we regard as having failed to uphold their standards in previous communications.

Third parties should not purport to speak on behalf of Legalease or express any views attributable to Legalease unless expressly authorised to do so by Legalease. In particular, we ask all third parties to note the following principles with regard to collaborative social media engagement with Legalease:

- **RESPOND TO MISTAKES QUICKLY**
- **DON'T BE ARGUMENTATIVE**
If you speak negatively about a Legalease competitor's business in any way, do not disparage the competitor beyond stating the facts to make your point. Be respectful to all others in the online community.
- **BE RESPECTFUL**
- **COMPLY WITH OUR POLICIES**
If your post would contravene any of Legalease's policies in another forum, it will also do so in an online forum. Do not disclose confidential or proprietary Legalease information, harass or discriminate against fellow employees, defame or disparage Legalease or fellow employees, or contravene any other Legalease policy by your posting.