



Turks.

Code of Conduct

Insurance • Commercial • Banking

INTRODUCTION

Turks has built its success on a combination of having great people, great clients and its ability to be able to deliver on its promises.

How we conduct our business and how we treat others is the underlying key to how we move forward as a business. Our Code of Conduct is an extension of this and outlines the behaviors and standards expected of our people.

The principles that operate within our code are:

- 1 We promote an ethical workplace – we respect others, behave with honesty and integrity and at all times provide a safe environment;
- 2 We understand our responsibilities to each other, we respect each other's confidentiality and we do not misuse information that we obtain;
- 3 We do the right thing by each other and our clients and comply with the law and our policies;
- 4 We take care of property or information provided to us and are proactive in safeguarding it from loss, theft and improper misuse; and
- 5 We manage conflicts of interest with professionalism and deal with them appropriately.

Our aspiration is to be a provider of high quality legal services with a highly engaged team committed to the needs and objectives of our clients. Each of us is personally responsible for ensuring that our core values and conduct continue to be reflected in everything we do and I thank our team for their commitment and part in upholding this.

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HOW THIS CODE APPLIES TO YOU

Our Code of Conduct (**'the Code'**) applies to all employees and partners (**'staff'**) working at Turks (**'the firm'**).

The Code sets out the way staff are expected to do business. All staff have a responsibility to report concerns or possible breaches of the Code. If you have any questions regarding the Code please contact the Risk Management Team.

A breach of the Code will be investigated and may result in disciplinary action.

PERSONAL AND PROFESSIONAL CONDUCT

Professional Behaviour

You are expected to conduct yourself in a professional manner whether in person, online or through any form of communication. Your actions should reflect positively on the firm and yourself.

Health and Safety

Health and safety is everyone's responsibility, and we all need to look out for one another's physical and mental wellbeing. As part of our commitment to mental wellbeing the firm provides access to Employee Assistance Programs in all locations.

The firm must be free from the use of alcohol and illegal drugs, and the misuse of other substances. The firm has zero tolerance for any form of inappropriate workplace behaviour including sexual harassment, harassment or any other kind of discrimination, bullying or victimisation.

The firm relies on you to:

- comply with work health and safety legislation and standards;
- speak up about any actual or potential safety hazards (physical or psychosocial);
- take care and protect your own health and safety.

Diversity and Inclusion

We promote a diverse, inclusive and equal workplace. Staff are expected to treat everyone with dignity, courtesy and respect.

We do not permit or tolerate discrimination in the workplace. This means all staff decisions must be:

- respectful of differences among staff and potential staff;
- based on factors relevant to their ability to perform their work, or would be expected to perform; and
- in accordance with all applicable laws and regulations.

This includes decisions related to the recruiting, hiring, assignment, compensation, training and development, promotion and dismissal of staff, as well as other terms and conditions of employment.

Applicable local laws, which we follow, vary, but differences that we strive to overlook in personnel decisions include race, colour, creed, religion, citizenship, national origin, ethnicity and/or cultural background, age, sex, gender, gender identity/expression, sexual orientation, marital status, pregnancy and disability.

WORKING WITH OTHERS

Fraud, Bribery and Corruption

Any form of fraud, bribery or corruption is strictly prohibited. Fraud, bribery and corruption risks can arise in a wide variety of circumstances including procurement, hiring, charitable donations, gifts, entertainment and more.

Supplier Relationships

We engage with suppliers who comply with all applicable laws, including but not limited to those related to human rights, labour rights (including forced labour) and applicable employment, environmental, anti-

corruption, fair competition and intellectual property laws. A responsible supply chain is critical to the success of our business.

We seek suppliers who share our commitment to:

- lawful business practices;
- high standards of business conduct;
- minimise impacts on the environment;
- provide a safe and healthy workplace;
- respect the rights of all staff and local communities;
- applying security and privacy protection to all aspects of business.

Conflicts of Interest

We have an obligation to act in the best interest of the firm at all times. A conflict of interest may arise when personal activities, interests or relationships interfere, or may interfere with our obligations and professional duties as staff of the firm.

You are responsible for understanding how a conflict of interest may arise as part of your role and know how to escalate any conflicts to ensure they are managed appropriately.

In case of doubt, we act in accordance with the firm's Conflict of Interest Policy.

CARING ABOUT SOCIETY

Human Rights

The firm is committed to respecting human rights and addressing modern slavery by:

- rejecting any form of slavery in our operations and supply chain but not limited to forced, bonded or child labour
- Respecting that all staff have a right to fair pay and reasonable work conditions.

Supporting Community

As a corporate citizen, the firm supports employee participation in professional associations, charitable organisations and other community activities. The firm also recognises that individuals may wish to participate in political activity or serve in public office.

Sustainability

We recognise the importance of environmental sustainability to our people, clients and the communities in which we live and work. We expect all staff to contribute to the firm's efforts to reduce, reuse and recycle. Whilst our environmental impact is relatively small we still have a responsibility to be sustainable.

TECHNOLOGY

Social Media

You are expected to comply with the firm's Acceptable Use Policy and Social Media Policy. Our policies apply to both communications related to your job responsibilities and to your personal communications that could impact the firm. Be mindful of the content created, shared and posted. Always use good judgment when engaging in social media activity.

Protecting our Assets and Information

Assets include physical and non-physical property such as equipment, inventory, technology, money, intellectual property and the firm's information and data. Staff are responsible for safeguarding the firm's assets at all times. Information should be shared in accordance with the firm's Data Handling Policy.

Staff must:

- use the firm's resources responsibly and appropriately at all times;
- ensure hardware such as laptops, phones and mobile devices are never left in public or unsecured;
- ensure all sensitive, confidential and personal information is protected at all times by following relevant policies and procedures.

Information Security

We have rigorous protocols and technologies to protect our systems, and we all play a role in protecting data. Staff must:

- be aware of risks and how you can prevent them;
- report any suspicious activity, including phishing emails and potential or real security related incidents to the IT Helpdesk;
- use systems, equipment and communications in accordance with the Acceptable Usage Policy and Information Security Policy.

SPEAKING UP

If you have any questions about the Code and how it applies to day to day situations, please speak to the Chief Executive Officer ('CEO'), Supervising Partner or Human Resources.

If you become aware of a real or potential breach of the Code, you should report your concerns to the CEO, Supervising Partner, Human Resources or the Risk Management Team. If you don't feel comfortable doing that, other options available to you are set out below.

You are protected by the firm's Whistle Blower Policy in relation to reporting a real or potential breach of the Code.

Concern	Contact
Personal Wellbeing	Human Resources
Sexual Harassment or other form of Harassment, Discrimination or Bullying	Human Resources
Work Health and Safety	Human Resources Office Management
A Breach or Incident relating to a Policy, Process or Law	Human Resources Risk & Information Security
Fraud, Bribery and Corruption	Risk & Information Security
A Security Incident or Threat	Risk & Information Security
Whistle-Blower	Risk & Information Security
Suppliers	Risk & Information Security
Conflicts of Interest	Risk & Information Security
Diversity and Inclusion	Human Resources

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