

Irwin Mitchell Code of Ethics

Our commitment to responsible business

Our aspiration, in line with our purpose-led strategy and our core values, is to be recognised as a leading responsible business. To us, this means having a strong culture as well as a clear and ambitious strategy to respond to the environmental, social and governance (“**ESG**”) issues which are material to our business.

Our purpose is about helping businesses and people to do the right thing - now and for the future. It is that ethos which underpins our entire approach to responsible business.

We are committed to building on our strong heritage to develop innovative, trusted, and impactful relationships with our stakeholders. And we are proud to be a signatory to the United Nations Global Compact (“**UNGC**”), committing to uphold its Ten Principles around Human Rights, Labour, Environment and Anti-Corruption.

We understand that a commitment to doing the right thing will in the long-term, create value and enable our organisation to grow in a sustainable and responsible way. Creating extraordinary experiences for our clients requires our colleagues to have an understanding of the environmental, social, governance and wider ethical issues impacting on the advice we provide and the way we provide it. Our Code of Ethics acts as a guide for our colleagues and those people who work with us, including our clients, suppliers, and members of our wider communities. Underpinned by a suite of policies, it outlines the basic principles and standards which govern the way we do business, and we expect all our colleagues to be proud to uphold it.

Signed



Craig Marshall
Group CEO

Equality and Human Rights

We strive to create a healthy, fair, and inclusive culture where we respect different views, ensure that everyone feels safe and included, and discrimination, bullying and harassment are not tolerated.

We are committed to continuously improving our organisational resilience by proactively promoting and supporting each other’s wellbeing and maintaining good psychological health.

We respect and strive to uphold the principles of the Universal Declaration on Human Rights through our commitment to the UNGC, recognising that human rights are an integral part of our client services and core to our value of working with a foundation of integrity.

We will not knowingly tolerate forced or child labour, or modern slavery, in any aspect of our business operations. We will respect the right of freedom of association, and we will aim to always uphold and be guided by the commitments we have made in our [Modern Slavery Statement](#).

This approach is under-pinned by our values and evidenced further in our internal policies and in our annual [Pay Gap Reports](#).

Environment and Sustainability

Environmental sustainability is important to our colleagues, our clients, and our communities and we recognise our responsibility to manage our impact on the environment, addressing climate change and biodiversity loss in all aspects of our operations.

We will continue to set clear, near and long-term goals to minimise our impact on the environment and:

- improve reporting and external transparency around our ambitions and achievement
- support and educate our colleagues
- work with our supply chain to reduce their environmental impact and
- seek opportunities to work with our clients on their Net-Zero journeys.

We will commit to each playing our part, in whatever way we can to support the delivery of our [Environment Strategy and Roadmap to Net-Zero](#), aiming to always uphold the commitments we have made in our Environmental and Energy Policy Statement and all applicable statutory obligations on our business.

Community Investment

We will support Irwin Mitchell’s long-standing commitment to our local communities through fundraising, volunteering, and providing pro bono legal advice, for those who cannot easily afford to access justice, aligned to our purpose and strategy.

We will seek to work together in collaboration with the Irwin Mitchell Charities Foundation (“**IMCF**”) for the benefit of charitable organisations in our local communities and for our partner charities. (The IMCF is an independent charitable foundation set up by colleagues in 1997 to support those experiencing hardship and distress in our communities).

We will aim to identify opportunities to use our 14-hour (pro rata) community allowance to participate in skills-based volunteering opportunities aligned to our Responsible Business strategy and which positively impact our communities.

Business Relationships

We will strive to ensure that trust is the foundation upon which all our business relationships are built, recognising that this is inextricably linked to our commitment to doing business responsibly, inclusively, and sustainably.

We will seek to work with organisations who share our commitment to doing the right thing and our ambition for doing business responsibly.

We will aim to continuously improve how we monitor the ESG performance of our suppliers and the progress they are making, as part of our procurement process and supplier management programme.

Wherever possible, we will develop close working relationships with our clients, suppliers, and business contacts with the aim of generating innovation and creative solutions to shared issues.

Integrity

We are committed to acting fairly, honestly and with integrity, upholding the values and professional standards of our regulatory and professional bodies and of Irwin Mitchell. We will always aim to have respect and consideration for the laws of the jurisdiction we are working in.

Subject to any overriding obligations, we will abide by our duty of confidentiality, acting independently, identifying, and managing personal or professional conflicts.

We will seek guidance and advice and we will support and trust each other when making complex decisions in the course of our business.

We will adhere to strict ethical standards and will not knowingly tolerate bribery or corruption or any illegal activity in any aspect of our business. We expect and will seek to achieve compliance with the standards set out in our internal policies. We require our colleagues to follow our External Business Interest procedure.

For the avoidance of doubt, we will not make contributions (monetary, in-kind or otherwise) to political parties, committees or candidates connected to the furtherance of political beliefs or objectives.

We expect our colleagues to undertake regular mandatory compliance training to update their knowledge in these areas.

By adhering to this Code of Ethics and evolving our approach to ensure our practices and processes remain in line with best practice and regulatory and statutory requirements, we can collectively ensure that we continue to make the progress needed to become a leading responsible business.

For more information about our Code of Ethics, please contact: responsiblebusiness@irwinmitchell.com

May 2024

Document History

Version	Date	Changed by	Description/Change Details	Next Review Date
1	May 2024	Responsible Business & Sustainability	New guidance	May 2025

Business Owner	Kate Fergusson, Director of Responsible Business & Sustainability
Application	Group wide: All IM Group entities