

Supplier Code of Conduct

January 2023

1 Introduction

This Supplier Code of Conduct aims to clearly set out our commitment when working with third party suppliers. It also details what behaviours and standards are expected from suppliers in return. All relationships with the Group's supply chain are based on trust, integrity, and transparency.

We're keen to collaborate with suppliers to promote knowledge sharing and best practice to elevate and improve outcomes in all areas of procurement and supply chain management.



2 Our commitment to being a leading responsible business

Our aspiration 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 address the Environmental, Social and Governance (ESG) issues which are most material to our business. We recognise the power of impactful collaboration and developing trusted partnerships with our suppliers will play in helping us achieve this.

As signatories of the **United Nations Global Compact ("UNGC")**, we are committed to **its ten principles** and we work to the framework provided by the **Sustainable Development Goals ("SDGs")**.

3 Key principles

- We aspire to work to the highest standards of competence and integrity
- We are committed to managing the wider environmental, social and economic impacts of our business operations when purchasing goods and services to ensure a positive outcome for our colleagues, clients and communities
- We aim to follow best practice sourcing and buying processes, to ensure fairness, transparency and free competition at all times
- We are committed to ensuring there is transparency within our business and in our approach to tackling modern slavery in our supply chain, consistent with our obligations under the Modern Slavery Act 2015
- We shall not solicit or receive any personal benefit from suppliers, such as excessive entertainment or the acceptance of gifts and gratuities beyond the extent of socially acceptable business practices

- We respect the confidentiality of information, personal data, sensitivities around data and information security. As a result, we are committed to ensuring and demonstrating compliance with our obligations under the UK GDPR and Data Protection Act 2018.

4 What we are committed to

- Ensuring all sourcing activity is in line with our procurement policy and guidelines
- Conducting our procurement processes in line with best practice, in a transparent and honest manner, in line with all legal and regulatory requirements
- Treating all our suppliers fairly with integrity and respect
- Regular and proportionate due diligence and audit checks on suppliers to ensure that all areas of supply chain risks are identified and mitigated
- Transacting and paying suppliers in line with agreed payment terms
- Ensuring responsible business considerations form part of our critical supplier selection and developing our processes so it features as a key part of our ongoing supplier relationships, including our commitments to:
 - Achieving Net Zero by 2040
 - The UK Government's **Disability Confident framework**
 - Stonewall's **Workplace Equality Index** to support lesbian, gay, bi and trans inclusion
 - Business in the Community's **Race at Work Charter**
 - The **Mindful Business Charter**.
- Encouraging and supporting our suppliers and partners to reflect the values of our organisation through their own commitments
- Working towards diversifying our supply chains to include diverse-led businesses and enterprises
- Where possible, working with our suppliers to find a solution if they experience a disruption to their service.

5 What we expect our suppliers to commit to

As a legal and financial services provider our stakeholders hold us to the highest of standards. Whilst we recognise that our supply chain is made up of diverse and unique organisations, we ask them all to help us uphold these standards in a way that is reasonable to their size and sector.

5.1 Standards

- Comply with all laws and regulations including all contractual obligations
- Deliver quality and comply with supplier terms and conditions
- Submit accurate proposals and invoices to us
- Behave in a way that is in line with our values
- Sign up and adhere to the relevant industry best practice codes of conduct where appropriate.

5.2 Responsible Business and Risk Management

- Strive to manage operations in accordance with robust ESG practices, ensuring the relevant policies and procedures are in place and applied
- Ensure that responsible supply chain management is in place within the supplier's own organisation to manage risk and monitor performance in relation to ESG
- Work together with us to achieve our environmental objectives such as our Net Zero by 2040 commitment; particularly those relating to climate change mitigation, adaptation and sharing data and information
- Support initiatives that help and strengthen local communities
- Proactively take responsibility for the health, safety, and wellbeing of their colleagues
- Ensure all policies and processes are inclusive and take a zero-tolerance approach to all forms of bullying, harassment, and discrimination in line with the Equality Act 2010
- Identify shared objectives and collaborate in partnership with us where appropriate to address them by sharing best practice and driving innovation

- Identify and mitigate risks and ensure compliance within their own supply chain by maintaining a clear overview of third party suppliers and ensuring they apply good risk management practices. This will include providing Irwin Mitchell with documentation annually (as a minimum) which sets out how risks are identified, treated and managed
- Speak up and feedback on any instances where a supplier feels that Irwin Mitchell has not adhered to this Statement of Intent
- Notify Irwin Mitchell immediately of any disruption, or potential disruption, to their business which has the potential to impact the service provided to us, or the services we provide to our own clients
- Work with Irwin Mitchell as a trusted partner and provide support to help us comply with relevant legal and regulatory obligations as required.

Document History

Version	Date	Changed by	Description/Change Details	Next Review Date
1	January 2023	DPU	Rebrand	
2	October 2024	DPU	Rebrand	

Business Owner	Lee Mulligan
Application	Group wide: All IM Group entities