

Supplier Code of Conduct

September 2026

1. Introduction

Our aspiration is to be recognised for the remarkable impact we can create by doing business responsibly, guided by our purpose led approach and core values. To us this means having a strong culture and a clear and ambitious strategy to respond to the environmental, social, and governance (“**ESG**”) issues which are material to our business.

We recognise the power of impactful collaboration and how important developing trusted partnerships with our suppliers is in achieving this.

2. Purpose of this document

This Supplier Code of Conduct outlines our standards and expectations for suppliers, ensuring partnerships are built on trust, respect, and shared values, and supports our ambition across our Responsible Business focus areas.

We encourage all our suppliers to embrace these principles and work with us to foster positive change.

While our Supplier Code of Conduct is grounded in current UK legislation and best practices, we understand that regional and sectoral differences exist. We also recognise that organisations will be at varying stages of sustainability maturity and for some, these principles may still be aspirational. In these instances, we value the commitment and demonstration of continuous progress. We also accept that some very large companies with a mature approach to tackling ESG issues are unable to respond to individual client requests to support Code of Conducts.

In cases where a supplier does not formally acknowledge or meet the requirements of this Code, we will undertake a proportionate assessment using publicly available information and risk indicators.

3. Our Approach to Responsible Business

In FY24, we engaged over 100 of our stakeholders, ranging from clients and suppliers to colleagues and our community partners, to identify the most significant ESG risks and opportunities for our business, through our double materiality assessment. This resulted in identification of four focus areas which reflect our responsible business ambitions and aspirations:

- **Protecting our Planet** – reducing the impact of climate change through education, responsible consumption and the provision of sustainable services
- **Progressing Inclusion and Wellbeing** – improving wellbeing and diversity through our services, values driven culture and sustainable and inclusive employment
- **Empowering our Communities** – reducing inequalities through education, employability, and by widening access to justice
- **Building Organisational Resilience** – developing healthy and resilient organisations through a focus on ethical, accountable, and inclusive governance.

We are proud signatories of the UNGC and have committed to its 10 universally accepted principles in the areas of human rights, labour, environment and anti corruption and the framework provided by the [Sustainable Development Goals \(SDGs\)](#). We encourage our suppliers to adopt and commit to upholding these principles and identify where they can contribute to the delivery of the SDGs.

4. Protecting our Planet

4.1 Our Approach

Following the successful verification of our near and long term science based emissions reduction targets with the Science Based Targets initiative (SBTi), we are making positive strides towards our goal of achieving net zero by 2040.

Our approach centres on four objectives:

- Energy and fuel: Moving to renewables and reducing overall demand, including decarbonising our fleet through a transition to zero emission vehicles
- Supply chain: Engaging our suppliers to collaborate on reaching net zero by 2040
- Business Travel: Managing travel emissions whilst continuing to meet the needs of our clients and wellbeing of our colleagues
- Stakeholder engagement: Engaging our colleagues, clients and wider communities to achieve our sustainability goals.

We are committed to transparency and hold ourselves accountable by measuring our impact and reporting annually on the progress we are making. We work with third parties and use a range of external benchmarks and certifications to support our continuous improvement. This includes annual certification to ISO 14001 – Environmental Management and ISO 50001 – Energy Management.

4.2 What we expect from our Suppliers

- We expect our suppliers to fulfil all legal requirements relating to the environmental impacts of their company
- We encourage our suppliers to have a clear Environmental policy and to set science based carbon reduction targets aligned to SBTi criteria
- We ask that suppliers be willing to share their approach to managing their identified environmental risks
- We expect our suppliers to measure and report Scope 1 and Scope 2 emissions, and Scope 3 where material. We understand the challenges associated with this and, in instances where this data is not readily available, welcome the opportunity for collaboration so we can capture and report this critical data
- We encourage our suppliers to develop and utilise environmentally friendly technologies and to promote greater environmental responsibility amongst its stakeholders.

5. Progressing Inclusion and Wellbeing

5.1 Our Approach

Our Diversity and Inclusion (D&I) Plan underpins our commitment to creating an inclusive workplace culture where all our colleagues feel a sense of belonging and are enabled to thrive. We're committed to improving the diversity of our workforce, so that it reflects the communities we serve.

- Fair and Equitable Policies and Processes: Ensuring that our internal processes are fair and consistent and providing equal opportunities
- Inclusive and Visible Leadership: Helping our leaders and colleagues integrate inclusiveness into what they do and how they do it
- Inclusive Culture: Empowering colleagues to be themselves at work, be active allies, and feel comfortable raising concerns

- **Client Experience:** Proactively engaging clients on D&I, sharing best practice, and providing clear information about our approach and performance
- **Inclusive Communities:** Drive alignment between network groups, volunteering, and Early Careers priorities to support underrepresented young people.

Health and Safety: We are committed to providing a safe and healthy working environment for all employees. This includes compliance with all applicable health and safety (H&S) laws and regulations, as well as the implementation of proactive measures to prevent workplace accidents and injuries. We ensure that all employees receive adequate training on H&S protocols, and that appropriate safety equipment is provided and maintained. Regular H&S audits are conducted to identify and mitigate potential hazards, fostering a culture of continuous improvement in workplace safety.

Wellbeing: Beyond physical H&S, we recognize the importance of employee wellbeing in terms of improving job satisfaction, productivity, and retention. We strive to promote a positive work life balance, support mental health initiatives, and create an inclusive and supportive workplace culture. This includes providing access to resources such as counselling services, stress management programmes, health services benefits, financial wellbeing and opportunities for professional development.

5.2 What we expect from our Suppliers:

- Suppliers must take all reasonable steps, including maintaining appropriate policies, training and reporting arrangements, to prevent discrimination, harassment, sexual harassment, bullying, victimisation and retaliation, and to protect their employees, workers, contractors, agents and subcontractors, as well as Irwin Mitchell colleagues they interact with, in line with applicable legislation
- Suppliers must take all reasonable steps to prevent harassment, including sexual harassment, by their employees, workers, contractors, agents and subcontractors when interacting with Irwin Mitchell colleagues, whether in person, online or through other business communications
- Suppliers must maintain appropriate reporting and investigation arrangements, cooperate with reasonable investigations, and take prompt corrective action where harassment, discrimination or other inappropriate conduct is identified, and immediately notify Irwin Mitchell
- We expect our suppliers to fulfil any legal requirements to publish pay gap reports, and value any additional voluntary disclosure of relevant pay gaps
- We expect our suppliers to have a clear policy and strategy for D&I inclusive of their employees and supply chain, that is overseen at the highest level of the organisation. We encourage transparency through the publication of the approach and data relating to KPIs which demonstrate performance
- We encourage suppliers to work with diverse businesses and implement inclusive sourcing practices within their own organisations
- We encourage suppliers to explore external accreditations to improve inclusion for their colleagues and customers, such as the Disability Confident Scheme and the Social Mobility Employers Index. We are happy to discuss our own journey with any supplier considering entering
- We encourage suppliers to collaborate with Irwin Mitchell to enhance awareness of diversity and inclusion issues among staff and the wider society
- We expect our suppliers to uphold the same H&S standards by providing safe working conditions, ensuring compliance with all relevant H&S regulations, and fostering a culture of wellbeing
- Suppliers are expected to implement robust H&S management systems, conduct regular risk assessments, and provide appropriate training to their employees
- We encourage suppliers to support initiatives, such as the Mindful Business Charter, that promote mental and physical wellbeing, contributing to a healthier and more productive workforce.

6. Empowering our Communities

6.1 Our Approach

We have a long standing commitment to supporting our local communities through fundraising, volunteering and providing pro bono legal advice for those who cannot access justice.

Colleagues are encouraged to use their annual 14 hours (pro rata) community allowance by taking part in skills based volunteering or pro bono opportunities where we can create the biggest impact, as identified through our materiality assessment.

Our main aim is to support young people as they prepare for life after education, widening access to careers in our sector, and improving life chances in areas of the UK where social mobility has been identified as a key issue. We work with a range of third parties to achieve this.

6.2 What we expect from our Suppliers

- We encourage suppliers to actively engage with the communities in which they operate or where they have identified, through stakeholder engagement, they can make a positive impact
- This could involve supporting initiatives that help reduce inequalities and improve health and wellbeing in local communities or participating in fundraising or charitable giving aligned to that community's needs
- We celebrate suppliers who demonstrate their commitment to social responsibility through partnerships with not for profit organisations, fundraising, volunteering or the provision of pro bono services
- We encourage the identification of opportunities to collaborate on social responsibility projects with our suppliers.

7. Building Organisational Resilience

7.1 Our Approach

Underpinned by a suite of policies and documents, some of which are listed below, our Code of Ethics acts as a guide for the people and organisations who work with us, outlining the basic principles and standards which govern the way we do business, which we are proud to uphold and share.

- Our [Modern Slavery Statement](#) provides detailed information on our efforts and initiatives to eradicating all forms of human trafficking, bonded, forced and child labour in our supply chain and operations
- Our [Anti Bribery and Corruption Statement](#) outlines our zero tolerance approach
- Our [Privacy and Security Policies](#) demonstrate our commitment to upholding the highest standards of data protection and cyber security

Aligned to our commitment to the UNGC's 10 Principles, we proudly respect and uphold human rights in all our operations, ensuring that our business practices protect the dignity and rights of all the individuals we work with.

We aim to provide a safe and supportive environment where stakeholders can raise concerns without fear of retaliation or detrimental treatment. Concerns may relate to ethical misconduct, modern slavery, worker exploitation, discrimination, harassment, including sexual harassment, or other unlawful or unethical conduct. Concerns can be raised through an Irwin Mitchell contact or any confidential reporting route made available by Irwin Mitchell.

As a Living Wage Accredited Employer, we are committed to paying our people, and those regularly contracted to us, a fair and respectable wage.

7.2 What we expect from our Suppliers

- We require our suppliers to comply with all applicable laws, regulations, and standards in the countries in which they operate
- Suppliers must implement robust processes and procedures to prevent financial crime risks to Irwin Mitchell through our relationship. This includes having effective systems and controls to manage risks related to sanctions, money laundering, terrorism financing, proliferation of weapons of mass destruction, market abuse, tax evasion facilitation, bribery and corruption, and fraud
- Our suppliers must conduct their business in an ethical manner, avoiding conflicts of interest, and ensuring fair competition
- Suppliers must maintain accurate records and provide transparency in their business operations
- Our suppliers must not engage in, support, or benefit from human rights violations and abuses in any aspect of their operations, supply chains, product or service design, or customer interactions
- We expect suppliers to adopt a commitment to human rights covering their operations and value chains, adhering to any relevant voluntary or mandatory frameworks
- We ask our suppliers to improve awareness of modern slavery and human rights among their employees and improve processes to identify breaches of human rights
- We expect our suppliers to proactively work with us to remediate any situation where a breach of modern slavery is suspected
- We encourage our suppliers to commit to the Living Wage Foundation and ensure that the Real Living Wage is paid wherever possible.

7.3 How We Will Assess Compliance

We are committed to working collaboratively with our suppliers to ensure compliance with this Code. As part of our onboarding due diligence process, we will assess your compliance through an online questionnaire. This will include confirmation from a senior representative of your organisation that they have read and understood this Code and agree to work with us to improve the sustainability of our supply chain. Responses will be assessed and will form part of tender evaluations and contract renewals. As part of our due diligence, assurance and supplier review activities, we may request proportionate evidence of arrangements relating to equality, inclusion, dignity at work, prevention of harassment and sexual harassment, whistleblowing, incident reporting and investigation processes.

For suppliers assessed as presenting a higher level of risk, criticality or strategic importance to our business, we aim, as a minimum, to hold quarterly supplier review meetings. These meetings provide opportunities for suppliers to update us on progress against these areas and to raise any concerns that may be important for us to be aware of.

For our Tier 1 & 2 suppliers, we aim to, as a minimum, hold quarterly supplier review meetings which provide opportunities for suppliers to update us on progress made against these areas as well as highlight any concerns that might be important for us to be aware of.

Suppliers are expected to cooperate fully with any audits or assessments and take corrective actions as necessary to address any non compliance issues.

Wherever possible and appropriate, we will support our suppliers on their journey to best practice, by sharing our own experience and utilising our wider network of experts.

In the event of non compliance, we may, as appropriate:

- **Engage with the Supplier**
 - Work with the supplier to understand the problem and discuss how it will be improved
 - Work with the supplier to help the supplier identify, assess and manage risks associated with their responsible business plans.

- **Develop a Corrective Action Plan**

Collaborate with the supplier to develop a plan to address the non compliance issues.

- **Monitor Progress**

Regularly monitor the supplier's progress in implementing the corrective actions.

- **Termination of Relationship**

Where repeated or serious non-compliance occurs, Irwin Mitchell may take further action in accordance with the terms of the relevant supplier agreement, including ending the supplier relationship.

8. Conclusion

Goal 17 of the UN's SDGs emphasizes the importance of partnerships and collaboration to securing a sustainable future and we consider working with our suppliers to play a crucial role.

By adopting the principles in this Code, our suppliers agree to actively contribute to upholding our commitment to ethical business practices, human rights, environmental sustainability, and social responsibility.

We thank you for your support and look forward to working together.

Document History

Version	Date	Changed by	Description/Change Details	Next Review Date
1	01/2023	DPU	Rebrand	
2	04/2026	Lindsay Alexander	Review	03/2027
3	09/2026	Lindsay Alexander	Minor update to incorporate ERA 2025 requirements	03/2027

Business Owner	Finance Director (Neil Gilbert)
Application	Group Wide: All IM Group entities