

Sustainable Procurement Policy

1. Introduction

Irwin Mitchell (“**IM**”) is committed to responsible, transparent, and sustainable procurement, delivering best overall value while managing third-party risk in a proportionate way. This policy outlines mandatory requirements for engaging and overseeing third-party suppliers and the services they provide, covering the full lifecycle, from onboarding and in-service management through to exit planning.

The approach supports appropriate oversight, approvals, record keeping, and alignment with IM’s legal, regulatory, operational resilience and responsible business commitments.

Procurement is managed across onboarding, in-service and exit stages, with detailed requirements set out in the supporting procurement standards.

2. Applicability

This policy applies to all colleagues across the IM Group who:

- Identify, sponsor, approve or manage third-party suppliers, including procuring, contracting, renewing, changing, managing or exiting supplier arrangements and/or
- Interact with third parties in a way that could create a commitment or risk exposure for IM.

This Policy applies to suppliers engaged by or on behalf of IM to provide goods or services to IM for its own business operations. Subject to the out-of-scope activities set out below, this Policy covers third-party spend and services relating to new supplier engagements, renewals, extensions, re-procurement activity, changes to supplier arrangements, technology services, outsourced activities, and termination, transition or exit activity.

The Policy does not apply to procurement activity carried out on behalf of clients, or to third parties instructed as part of legal matter delivery, where the instruction is made for the purpose of providing legal services to a client and is governed by relevant legal, regulatory, client, matter management or operational procedures.

For the avoidance of doubt, where the same third party is being appointed to provide goods or services to IM for its own internal business use, this Policy will apply.

3. Out of scope

The following are outside of the scope of this Policy, provided they are not being used to appoint a supplier to provide goods or services to IM for its own business operations:

- Procurement or sourcing activity undertaken on behalf of clients. For example activity undertaken in Court of Protection directly for clients.
- Client/matter-related disbursements.
- Third-party instructions made as part of legal services delivery, including barristers/counsel, medical experts, expert witnesses and other matter-specific specialists.

These activities remain subject to applicable legal, regulatory, client, matter management, finance, conflicts, information security, data protection and operational procedures where relevant.

4. Procurement Requirements

Procurement is how the Group sources, selects, and manages suppliers to provide the goods and services the business needs. The following requirements apply:

Initiating procurement

All requests to engage, renew, change, or exit a third-party supplier must be submitted through the procurement intake process, Engage Procurement, unless an approved exception applies. The procurement intake process provides a controlled entry point through which procurement requests are submitted, assessed and routed to the appropriate procurement approach, ensuring the right level of governance, oversight and support is applied from the outset

No procurement outside of the Engage Procurement Process must take place, unless by prior exception as detailed in the Procurement Exemption Standard. Colleagues must have Procurement approval before:

- Instructing a supplier to start work
- Accepting terms (including by email or click through acceptance)
- Placing orders or making commitments on behalf of IM.

All technology-related requests must also be submitted through the CIO Front Door Process.

Risk assessment

All required services are to be subject to an Inherent Risk and Tiering Assessment.

This assessment determines the overall risk rating (High, Medium, or Low), which drives the level of due diligence, approvals, contractual requirements, and ongoing oversight required.

The assessment must be completed before any commitment is made and reviewed where there is a material change that could impact risk.

Spend thresholds and engagement model

Procurement involvement and responsibilities are determined by the total contract value (“TCV”) and the risk rating of the service. Risk may override spend where appropriate.

For low-value, low-risk purchases, the level of procurement activity should be proportionate to the value, complexity and risk of the requirement. This may include a simplified, Fast-Track or self-serve approach where the purchase does not create material legal, regulatory, financial, information security, privacy, operational resilience, reputational or sustainability risk.

Competitive pricing should be obtained where feasible and proportionate. Three quotes are not mandatory where they are not practical, relevant or value-adding, for example for low-value event stands, sponsorships, venue-related items, one-off marketing activity, specialist creative services, or other strategic Business Development and Marketing spend where supplier selection is driven by audience, location, client relationship, brand alignment, exclusivity, expertise or campaign requirements.

Where a single supplier is selected, the Business Owner must retain a brief rationale for the supplier selection and ensure the purchase is approved in line with the Financial Authority Policy and any applicable contract requirements. Appropriate financial approvals and records must be maintained.

Total Contract Value (TCV) / Risk	Business Owner – minimum actions	Procurement – minimum actions
£0–£50k TCV and/or Low Risk (Self-serve with guidance. For requirements with a total contract value below £5,000, please refer to Procurement Exemption Standard, which sets out the minimum procurement, due diligence and approval requirements.)	• Submit request via Engage Procurement • Complete Inherent Risk & Tiering Assessment as prompted • Obtain competitive pricing (three quotes where feasible) • Ensure proportionate due diligence is completed • Comply with Financial Authority Policy • Comply with Contracts Policy • Complete Contract Summary where required	• Review and triage request • Assign reference • Validate risk rating • Provide guidance as required • Support completion of due diligence and supplier onboarding
£50k–£100k TCV and/or Medium Risk (Supported or led by Procurement)	• Submit request via Engage Procurement • Where self-service sourcing applies: – Complete Inherent Risk & Tiering Assessment – Ensure proportionate due diligence is completed – Comply with Financial Authority Policy – Comply with Contracts Policy – Complete Contract Summary where required	• Review and triage request • Assign reference • Validate risk rating • Support completion of due diligence and supplier onboarding • Provide guidance • Where Procurement-led, lead sourcing activities
£100k+ TCV and/or High Risk (Procurement led)	• Submit request via Engage Procurement • Complete Inherent Risk & Tiering Assessment • Partner with Procurement on requirements and evaluation • Support approvals process	• Lead sourcing (including RFx where appropriate) • Undertake due diligence • Lead negotiation • Manage approvals • Ensure contract protections align to risk. • Comply with Financial Authority Policy • Comply with Contracts Policy • Complete Contract Summary

Whilst Procurement may support or lead elements of the sourcing activity, the Business Owner remains accountable for key decisions and the outcome of the engagement.

Financial approval

All spend must be approved in line with the [Financial Authority Policy](#) and supporting [Matrix](#).

No financial commitment may be made without confirmed budget approval and the appropriate level of financial authority.

5. Role and Responsibilities

Business Owners:

Business Owners are the colleagues responsible for the supplier relationship and delivery of the service or outcome. They are accountable for the supplier throughout its lifecycle, including defining the requirement, ensuring the appropriate procurement and governance processes are followed, securing required approvals, and managing supplier performance and outcomes once engaged.

Procurement team:

Procurement provides governance, oversight, and support across procurement activity. This includes operating the Engage Procurement process, determining the appropriate procurement approach, advising on sourcing strategy and governance requirements, leading sourcing and negotiations where required, and supporting proportionate due diligence and onboarding to ensure compliance with this policy.

Oversight Functions:

General Counsel Team, Risk, Information Security, Resilience and Finance provide independent oversight, challenge and approvals where required, based on the nature and level of risk. They support effective governance by reviewing relevant activity within their area of expertise and ensuring risk and control requirements are appropriately addressed.

Internal Audit provides independent assurance on the effectiveness of controls and compliance with this Policy.

6. Mandatory Controls

The following controls apply to all procurement activity; the level of control must be proportionate to the risk of the service.

Control	Requirements
Competition and selection	Supplier selection must be fair and proportionate with appropriate evidence retained. Where a single supplier is used, the rationale must be documented.
Due diligence	Due diligence must be completed before engagement. The scope and depth must reflect the level of risk and include Environmental, Social and Governance (“ ESG ”) considerations where relevant. Where required, checks must be completed using the approved supplier assurance platform, with outcomes recorded.
Contracting	A legally binding contract must be in place before any work begins, unless an approved exception applies. All contracts must be reviewed and approved in line with the Contracts Policy and Financial Authority requirements.

Control	Requirements
Conflicts of interest	Conflicts of interest must be declared, assessed and managed before proceeding.
Record keeping	A complete audit trail must be maintained, including risk assessments, due diligence, approvals, and contracts. Records must be stored in the relevant IM system for that type of information (for example, the Procurement Intake tool, contracts repository or governance hub), as set out in the supporting standards.
Sustainability and ESG	Sustainability requirements must be considered as part of procurement activity. This includes applying the Supplier Code of Conduct and taking ESG factors into account where proportionate.
Change control	Material changes, renewals and extensions must be submitted through Engage Procurement and assessed before any commitment is made. Risk assessments must be reviewed where changes may affect risk.
Exit planning	Exit arrangements must be considered at the point of contracting and maintained throughout the lifecycle where required. For higher risk services, a documented exit plan must be in place.

7. Exceptions and Breaches

Exceptions

Exceptions are not required where an activity is expressly outside the scope of this Policy.

For in-scope procurement activity, an exception may be requested where full compliance with the standard procurement process is not possible or proportionate. This may include urgent operational requirements, low-value/low-risk tactical purchases, strategic BD or Marketing activity, or situations where only one supplier is available or appropriate.

All exceptions must

- Be requested through the [Engage Procurement](#) process (or approved exception route)
- Include a clear rationale and assessment of associated risks
- Define any mitigating actions to manage those risks
- Be approved at a level proportionate to the risk
- Be recorded and retained for audit purposes

Approval must be obtained before any commitment is made.

Breaches

Failure to comply with this policy may be recorded as a breach.

This includes:

- Engaging suppliers or making commitments outside of the approved process
- Failing to complete required assessments, approvals, or due diligence
- Breaching contractual or financial approval requirements.

Breaches may be:

- Recorded and monitored through governance processes
- Escalated to relevant oversight functions where appropriate
- Reported through governance forums, including senior management
- Serious or repeated breaches may result in disciplinary action.

8. Oversight, Monitoring and Reporting

Procurement is responsible for monitoring compliance with this policy and its supporting Standards. This includes:

- Monitoring completion of risk assessments, due diligence, and approvals
- Tracking compliance with contracting requirements, including “no work before contract”
- Reviewing exceptions and breaches, including trends and themes
- Maintaining oversight of higher risk supplier arrangements.

Findings will be used to support continuous improvement and may be reported through governance forums and to senior management where appropriate.

9. Supporting Resources

The following internal links may be referred to in this policy or contain additional information and guidance:

- [Financial Authority Policy](#) and [Matrix](#)
- [Contracts Policy](#)
- [Supplier Code of Conduct](#)
- [Conflicts of Interest policy](#)
- [Procurement Hub](#)

Signed



Craig Marshall
Group Chief Executive Officer
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Document History

Version	Date	Changed by	Description/Change Details	Next Review Date
1	19.09.2017			
2	03.06.2019	Lucille Marsh	Annual Review	June 2021
3	11.05.2021	DPU	Rebrand	
4	25.01.2023	Charlotte Wales	Slight changes	
5	14.03.2023	Lucille Marsh	Updated Version following review	March 2024
6	September 2023	DPU	Rebrand and update hyperlinks to SharePoint	
7	11.07.2024	Lee Mulligan	Minor changes	
8	June 2026	Lauren Brown – on behalf of Finance	Full policy review – Policy simplified and streamlined, links to added to improve usability and maintain a single source of truth	June 2027

Business Owner	Finance Director – Neil Gilbert
Application	Group wide