



Anti-Bribery & Corruption Policy Statement

Irwin Mitchell LLP

Introduction

Irwin Mitchell LLP is unique, both in its culture and its approach to law. Nationally acclaimed, with strong international capabilities, Irwin Mitchell LLP is one of a few law firms to provide a diverse range of legal services to businesses and private individuals. It has a strong customer service culture and a high level of client retention.

Our Commitment

Bribery and corruption remain a major issue in world trade, despite the many dedicated efforts to prevent it. As a regulated law firm, our legal and regulatory obligations to combat bribery and corruption are determined by the Bribery Act 2010 (the Act), which came into force in the UK on 1 July 2011.

Our position on bribery is clear: it is illegal. This is so both under UK law and the laws of other countries where we do business.

What is Bribery?

Bribery is a form of corruption. It includes offering, promising, giving, accepting or seeking a bribe.

A bribe is a financial or other advantage, promised, requested or given to induce a person to perform a relevant function or activity improperly or to reward them for doing so.

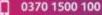
In practical terms, a financial or other advantage is likely to include cash or cash equivalent, gifts, meals, entertainment, services, loans, preferential treatment, discounts or anything else of value.

The timing of the bribe is irrelevant and payments made after the relevant event will still be unlawful, as will bribes that are given or received unknowingly.

Responsibility

We run our businesses with integrity and have a zero tolerance approach to both the offering, and receiving of bribes by anyone working within, connected to, or supplying services to any of our businesses. We operate firm wide policies, including Anti-bribery and Acceptance of Gifts and Hospitality policies that are embedded by way of regular mandatory training and awareness programmes.

Our people conduct themselves and our business to the highest legal and ethical standards. We will not be party to corruption or bribery in any form. Such acts would damage our reputation and expose us, and our staff and representatives, to the risk of regulatory action, fines and imprisonment.



www.irwinmitchell.com

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Should you have any questions or concerns about our anti-bribery and corruption policy please contact the Risk & Compliance team at <u>ConductQueriesTeam@IrwinMitchell.com</u>.

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