

Code of conduct

Updated August 2026

Our Code of Conduct outlines our core shared values, principles and behaviours, which underpin everything that we do as a firm, including how we conduct business. Our core values are excellence, integrity, collaborative, progressive and responsible.

We expect all staff and Partners to align with our Code of Conduct as part of the firm's adherence to professional standards, ethics, laws and regulations.

1. Accountability

We are accountable to the firm and to each other for our actions, submitting ourselves to the scrutiny necessary to ensure this.

2. Honesty, Respect and Trust

We treat each other, at all times, with courtesy and respect, we earn the trust of others by listening to what they have to say and are open and honest about our decisions.

3. Integrity

We act ethically and with integrity, and we do not place ourselves under obligation to those who might try to inappropriately influence us. We do the right thing (and help others to do the same) even when no-one is looking, being a manifestation of our core values.

4. Independence and Objectivity

We always declare our interests. We act with objectivity and maintain our independence, making decisions impartially, fairly and without bias. In the event that conflicts of interest arise between our professional duties to the firm and our private interests (financial or otherwise) or by virtue of any other roles we hold, we seek advice from Risk and Compliance on how they must be managed.

5. Leadership

We provide direction, achieve our goals and keep things on track. We inspire, motivate, influence, coach and guide others. We promote and support the firm and each other. We encourage feedback and deliver it in a constructive manner. We are willing to challenge approaches and behaviour that do not align with our Code of Conduct. We engage across our firm to agree priorities, bringing together our current themes and initiatives. We work together as a team, sharing knowledge and ideas while supporting each other to

grow and work in a way that brings out the best in all of us, fostering a culture of collaboration and innovation.

6. Diversity and Inclusion

We promote an inclusive and diverse culture and environment where different perspectives and backgrounds are encouraged and valued and where everyone feels a sense of belonging. We do not act in a way that discriminates against particular individuals or interests, and we do not harass, bully, intimidate or act inappropriately towards others (as outlined further in our bullying and harassment policy). Leaders strive to demonstrate inclusive leadership through championing and being cognisant of the diversity and needs within their teams. We keep an open mind, assume good intentions, and are consistent with calling out inappropriate behaviour.

7. Governance

We are a responsible business. We protect the firm's reputation, acting always in the best interests of the firm, our staff and our clients. We comply with applicable standards, laws and regulations. We have information security measures in place to safeguard confidential information, intellectual property and personal data. We report any loss or unauthorised disclosures. We use social media in a responsible way. We do not make statements or misrepresent our own views as being those of the firm. We ensure that the firm has an open, transparent and safe working environment where staff feel psychologically safe to speak up and share ideas or raise concerns, and our complaints procedures are clearly communicated to them. We raise concerns in the knowledge that there will be no retaliation for reporting.

8. Excellence

We take pride in achieving the highest quality service across all areas of our professional life. We do not settle for second best. We go the extra mile to deliver and exceed client expectations. We deliver what we promise. We do not over-promise.

9. Responsible Business

We strive to have a positive impact in all our relationships. We integrate responsible business considerations in our firm for our people and to deliver long term value for society and the environment because we care.