

Code of Business Conduct

Mourant is a leading international law firm and a provider of specialist governance and regulatory services. We strive for excellence and the highest standards of professionalism, ethics and integrity in every aspect of our business. We are committed to complying with the laws and professional rules that apply to our business and to upholding the highest standards of propriety. Our people understand that they must:

Support the fight against financial crime: comply with all applicable laws and regulations relating to money laundering and the financing of terrorism and weapons of mass destruction proliferation.

Reject bribery and corruption: not offer, promise or give any financial or other advantage to anyone (including a public official) on behalf of the firm, a client of the firm or any other person, for any improper purpose or to influence any public official in the exercise of his or her duties. Furthermore, they must not request or accept any such advantage.

Oppose the facilitation of criminal conduct: not aid, assist or enable another person or the firm to commit a criminal offence, including fraud and tax evasion.

Protect and secure confidential and personal data: keep all confidential and personal data secure, protect it from loss, damage or destruction and take steps to avoid the risk of the unauthorised or unlawful access or processing of such data, including where AI tools are used.

Treat everyone with dignity and respect: Promote and support diversity, inclusion and a safe working environment free from bullying, harassment or victimisation of any kind. Comply with applicable laws and internal policies on personal conduct.

Not deal in financial instruments with inside information: observe the firm's rules limiting dealing in shares and securities to eliminate the risk of insider dealing and avoid any perception of impropriety.

Avoid personal conflicts of interest: report actual or potential personal conflicts of interest internally at the earliest opportunity so that steps can be taken to avoid any perception of personal bias and to preserve objectivity.

Avoid being compromised: not accept gifts or entertainment in breach of applicable laws and not knowingly breach any internal policies that apply to the giver or receiver of the gift or entertainment.

Respect employment protections: respect all applicable employment rights and protections, including those aimed at combatting modern slavery and human trafficking.

Build trusted relationships: build accountable and transparent relationships with each other, clients, suppliers and other third parties including delivering clarity on pricing and billing.

Speak up: adhere to the firm's internal policies on reporting concerns or illegal or improper conduct, including whistle-blowing and suspicious activity reports.

Act responsibly: act responsibly with positive social impact on our wider communities.

We expect our key suppliers to adhere to similar standards. All our people have access to this Code through the Mourant intranet. The principles within it will be reinforced through periodic training and the induction of new joiners. The operation of the Code and the related policies and procedures will be monitored and reviewed on an annual basis by our Risk Committee.

Jonathan Rigby, Chief Executive Officer
September 2025