



**DALCOUR  
MACLAREN**

# **SUSTAINABILITY CODE OF ETHICS AND CORPORATE RESPONSIBILITY**

Document Owner: Chief Finance Office

*People at Dalcour Maclaren are at the heart of our business, which was set up to create a future-focused professional practice that truly valued its people. Our ONETEAM. At Dalcour Maclaren we look to reward those who make a difference to the company, our clients and the wider community. Dalcour Maclaren strives to be a great place to work that draws people to it.*

*Our ONETEAM approach core value sits at the heart of our company, alongside our purpose “We Challenge, We Care, We Innovate”. Our values establish a set of standards embodied by our work, our relationships and our employees. They enable us to build deeper relationships with our clients and maintain a work environment that prioritises health and safety and fosters inclusivity.*

*Our Sustainability Code of Ethics and Corporate Responsibility serves to uphold these standards. This Code, which is supported by detailed Company policies, demonstrates our commitment to our core values and playing our part in delivering a vibrant and sustainable future.*

## **1- Upholding our Integrity**

**We strive to deliver the industry's highest standards of service and integrity. Our client relationships are based on respect, trust and transparency.**

### **Fair Dealing**

We are committed to fair and ethical business practices. Our dealings with clients, employees and suppliers are grounded in the principles of honesty and transparency. We are committed to providing clear and accurate information about our services, and policies, conduct all transactions honestly and fairly, avoiding deceitful or misleading practices and adhere to all applicable laws, regulations, and industry standards. We engage in fair competition, recognising and respecting the rights of our competitors and address any disputes or grievances promptly and fairly, striving for mutually beneficial resolutions.

### **Anti-corruption**

We are committed to maintaining the highest standards of integrity and ethical conduct in all our business activities. Corruption undermines trust, transparency, and the principles of fair competition. We comply with applicable laws including laws governing anti-bribery, anti-corruption, anti-money laundering, anti-trust, insider trading, market manipulation, and the exchange of gifts and entertainment meant to influence business.

### **Record Keeping**

We adhere to internal controls, policies and record keeping procedures we have established for compliance with our legal and business requirements.

### **Professional Independence**

Integrity, objectivity, independence and adherence to professional standards spread through all aspects of our business. We are dedicated to maintaining the quality of our services and comply with relevant professional bodies and internal processes and policies.

### **Conflicts of Interest**

We are committed to maintaining the highest level of integrity and transparency in our business operations. To uphold these principles, we must avoid situations where personal interests could interfere with our duty to act in the best interests of Dalcour Maclaren.

### **Commitment to quality standards**

We are committed to complying with applicable industry standards.

### **Conflicts of Interest**

We are committed to protecting the confidentiality, integrity, and security of all information entrusted to us by our clients, prospective clients, employees, and third parties. Upholding these principles is fundamental to maintaining trust and compliance with legal and regulatory requirements. We protect and take measures to maintain confidential information and adhere to stringent data privacy and security standards.

## **2- Delivering a vibrant and sustainable future**

**Our commitment to play our part and delivery a sustainable future is unmatched.**

### **Environmental stewardship**

We are committed to conducting our business operations in an environmentally responsible manner. We are actively working to achieve Net Zero by 2030. We collaborate with our clients closely to enhance their environmental practices and expect our employees to consider environmental impact of their decisions on how and where they work, particularly in relation to travel, suppliers and waste.

### **Human rights**

We support and respect international human rights, we do not tolerate abuses to any individual's human rights including discrimination, bullying, physical violence, forced labour, child labour or human trafficking. We expect and encourage our clients and our suppliers to take steps to prohibit the same abuses ensuring these principles are embedded in their operations.

### **Sustainable procurement**

We are committed to ethical and sustainable sourcing practices. We recognise that our procurement decisions have significant social, environmental, and economic impacts, and we strive to make responsible choices that align with our values.

### **Community involvement**

By volunteering our time, talent and resources, we can positively impact our communities and the people who live within them, while building a company-wide culture of giving back that strengthens our business and inspires our people.

### **3- Fostering a thriving workplace culture**

**People at DM are the most important part of our business, and our core values sit at the heart of our company. We foster a culture of mutual respect and trust and strive to maintain an inclusive working environment where our #OneTeam and relationships matter**

#### **Diversity, Equity and Inclusion**

We believe that a diverse, equitable, and inclusive environment is essential to fostering innovation, collaboration, and success. We are committed to creating a workplace where everyone feels valued, respected, and empowered to contribute their best.

#### **Anti-discrimination and harassment**

Every employee deserves to feel supported and safe. We strive to maintain a work environment that is free from discrimination and harassment and promotes equal opportunities throughout our supply chain, ensuring respect and confidence in all interactions.

#### **Workplace Health and Safety**

We are committed to maintaining a workplace that is healthy, safe, secure, and free from threats or acts of violence. This commitment is in line with our obligations under all relevant legislation. DM are committed to ensuring that all safety practices are realistic and effective, providing a secure environment for everyone.

#### **Training and Education**

Continuous development of our teams is essential to exceptional client service delivered. We have internal controls in place to reasonably ensure everyone has the opportunity to participate in professional development and continuing education opportunities.

#### **Equity**

DM pay practices are essential in promoting a diverse and inclusive culture, and we are committed to paying all our employees equitably. Our focus when determining compensation is the what and the how, rewarding behaviour that is consistent with the core values. We rely on objective criteria in setting compensation, including factors such as skills, experience, performance, responsibilities and business contribution. Our leadership is committed to achieving fair and equitable pay for all employees. We review our pay practices on a regular basis; we use up-to-date benchmarking data to stay competitive as well as equitable.

#### **Psychological safety**

We take steps to ensure our people feel supported and safe to say something should they feel our integrity is compromised in any manner. Our employees have a responsibility to the company to inform DM if they become aware of or suspect any illegal, dishonest or unethical act. Concerns can be reported internally via several channels.

## Contact

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