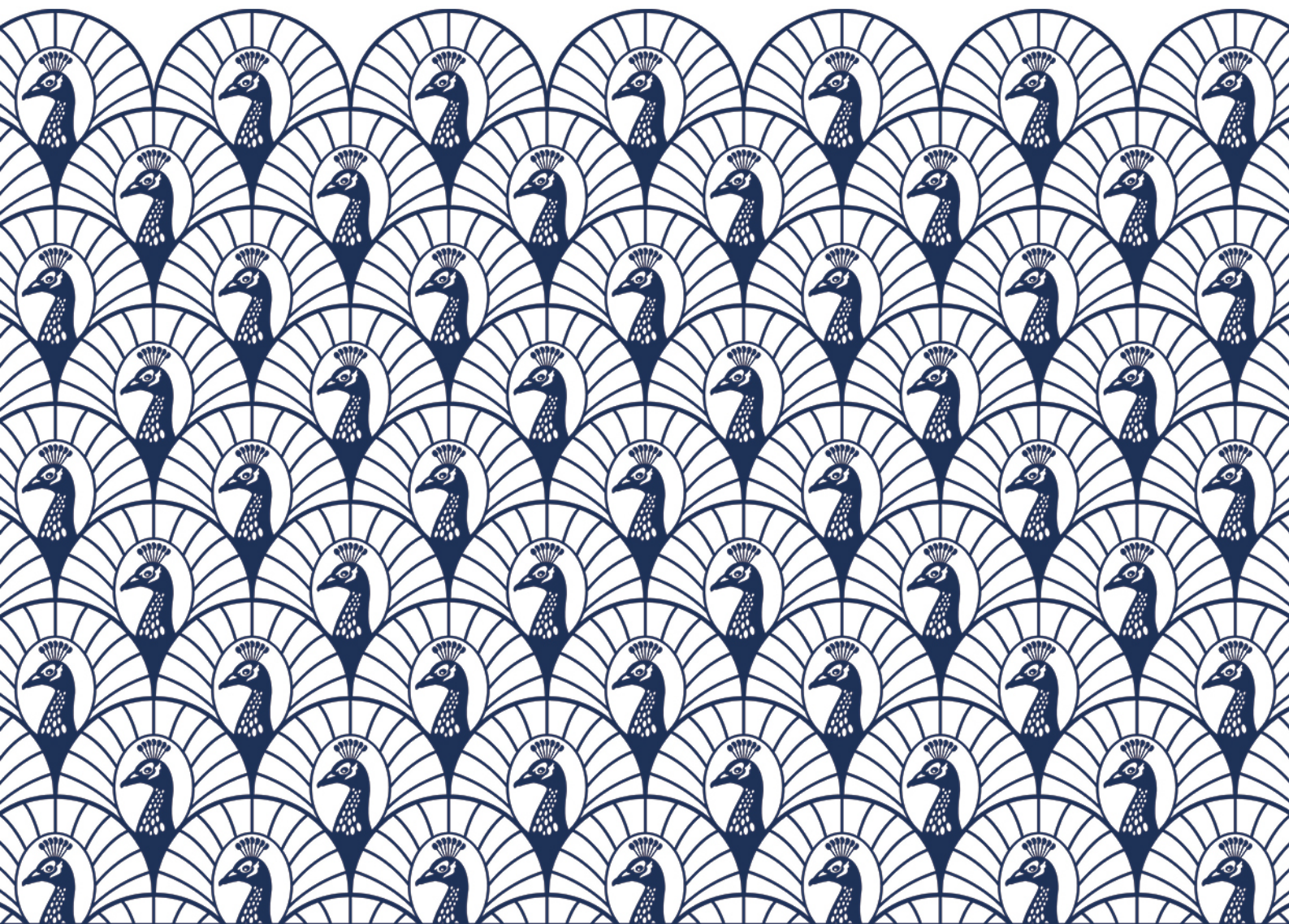




ARBUTHNOT LATHAM

Bankers since 1833



Supplier Code of Conduct

Approved by Risk Committee 21st March 2023

Owner: Daniel Dagg, Chief Operating Officer

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Foreword

Thank you for being a supplier to Arbuthnot Latham, or our subsidiary businesses. I am delighted to share with you our commitments and expectations in the first publication of our Supplier Code of Conduct.

Collaboration is at the core of what we do, and by building relationships we can deliver a professional and sustainable service to support the running of our business. Selecting reputable suppliers that are compliant and provide diverse enterprises allows us to go beyond our customer expectations to deliver a top class and personal service to our clients.

Adhering to our Supplier Code of Conduct is essential to ensuring our standards remain ethical and responsible, that we are minimising the risk of preventable issues, and we are compliant with regulatory requirements. We require all suppliers to conform with our values, as this plays an integral aspect in working collaboratively to meet milestones together:

- Relationships
- Forward thinking
- Entrepreneurial

We look forward to building a future with you and to develop mutually beneficial interests.



Dan Dagg
Chief Operating Officer

Introduction

Arbuthnot Latham & Co., Limited (“AL”) Supplier Code of Conduct is defined as a set of principles that govern the way we ethically and sustainably do business whilst operating within a procurement environment and applies to all third-party suppliers providing goods or services to AL and our subsidiaries. We aim to operate inclusively, with integrity and confidentially, and require all third-party providers to be compliant with our standards and expectations.

The Supplier Code of Conduct intends to outline our way of practicing responsible business throughout the supply chain, and the minimum we expect from our third-party relationships. We aim to work uniformly and collaboratively with our suppliers to monitor activities that, either indirectly or directly, impact our service to our customers, as well as work together towards positive environmental goals, in line with AL’s values and objectives.

As environmental and social issues become more pressing for organisations, customers, suppliers and investors, AL will strive to build mutually sustainable relationships in line with AL’s values and environmental objectives.

Key Principles

Our Key Principles act as a commitment to promote what we value within our relationships and our minimum expectations to fulfil customer needs and achieve industry standards.

We expect our suppliers to meet the principles set out below as a bare minimum:

1. Promote equal opportunities and diversity
2. Act with integrity to build long-term trust and transparency
3. Lawfully conform with all standards of governance and regulation including data, cyber and privacy protection
4. Endorse sustainable procurement within the supply chain, support initiatives to combat climate change and reduce environmental impacts
5. Ensure operational resilience practices are suitable
6. Adopt safe working practices for all employees and visitors whilst onsite, while prohibiting forced/child labour and ensuring wages meet legitimate mandated minimums
7. Comply with data, cyber and privacy protection

Diversity

We are committed to forming relationships inclusively with a diverse range of suppliers from SMEs, self-employed, medium to large sized companies. We encourage fair competition and expect our employees to mitigate conflicts of interests that may be untoward or disadvantage other suppliers that could be awarded future business.

Offering equal opportunities to all suppliers is essential to providing the right service. We abide by the Equality Act 2010 that promotes the rights of engaging with all stakeholders despite age, gender, religion, sexual orientation, and any other characteristic protected by law.

We do not tolerate any form of discrimination to employees or suppliers we work with.

As a minimum, we expect our suppliers to promote equal opportunities within the workplace and, if appropriate, confirm they have a Diversity policy or equivalent in place.

Integrity

Integrity is at the core of how we do business and prosper existing and new relationships.

Treating all relationships with integrity promotes longevity and greater service. We demonstrate professionalism and respond positively to open communication. Where we can improve and how we can implement business continuity measures to ensure the running of the Bank is crucial to maintaining honest dialogues.

We expect both our employees and suppliers to be trustworthy and behave respectfully. Taking accountability when services are not performing as well as they could be, and proportionately accepting which party should manage the risks. Failure in doing so may lead to service disruption which is not acceptable.

Our commitment is to demonstrate integrity so that we stay connected.

As a minimum, we expect our suppliers to engage in a positive and honest relationship with AL.

Governance

At AL, we have a responsibility to abide by applicable laws, regulation and standards and as a minimum, expect suppliers to comply with the laws and regulations in the country in which they are operating, as well as those English laws to the extent applicable to them, including but not limited to:

- The Bribery Act 2010 – the supplier should ensure that it does not engage in any form of anti-corruption or bribery.
- Financial Services and Markets Act 2000 – the supplier should have appropriate controls in place to guard against the risks of money laundering.
- Fraud – the supplier should have appropriate controls in place to prevent fraud being committed by its personnel.
- The Modern Slavery Act 2015 – the supplier should ensure they are free from unethical practices such as forced/child labour and trafficking within their supply chain.

Sustainability

We are committed to and recognise our own responsibility to ensuring our business activities have a positive impact not just for clients and shareholders, but also for colleagues, society, and the environment.

Our sustainable focus is related to measuring the impact from our practices and outputs across five categories: Governance, Employees, Community, Environment and Clients.

AL comply with all applicable environmental legislation and seek to keep pace with changing industry expectations and best practice. We continually strive to improve our stance on sustainability to promote working towards positive environmental goals. It is also our duty to take more care of the environment by mitigating supplier impacts and delivering services that are not disrupted by climate related issues, which impose a risk to our operations and commitment to our clients. We have implemented an Environmental Management policy which sets out our high-level approach to managing environmental issues and provides requirements to help the bank to achieve its commitments. Enhancing transparency within our own supply chains is part of our mission to work closely with our third-party relationships. In doing so, working together will help us establish how we can better engage and be held accountable in order to reassure our customers.

As a minimum, we expect our suppliers to provide evidence towards their environmental status, where relevant and appropriate.

Operational Resilience

We are in a position to react and adapt pragmatically when a supplier outage arises that impacts our client service and aim to respond quickly to resolving this. All suppliers, especially those that provide a critical, important or material service to us should also be dynamic in their approach and ensure operational resiliency practices are suitable for the service they provide.

It is imperative that we comply with financial regulation on operational resilience so that we can recover safely and mitigate against harm to our clients. We require all suppliers to treat business continuity as a priority and communicate any operational risks that could impact our service promptly.

All supplier business continuity plans should be proportionately stress tested as regularly as considered fit for purpose, as evidence of effective operational resilience practice.

As a minimum, if our suppliers are providing AL with an important or critical service, we expect our suppliers to provide us with their Business Continuity Plan when requested. We will notify suppliers as necessary.

Human Rights

Every year, AL publishes its Slavery and Human Trafficking statement (<https://www.arbuthnotlatham.co.uk/important-information>) as per the Modern Slavery Act 2015. We work with a diverse range of suppliers that are free from unethical practices, such as forced/child labour and trafficking, within their supply chain. We may terminate our relationship with other individuals and organisations working on our behalf if they fail to comply with the Modern Slavery Act 2015.

As a minimum, we expect our suppliers to comply with applicable laws and regulations, while adopting fair and ethical employment practices, and if applicable, provide evidence of this. Examples include, but are not limited to, an Anti- Modern Slavery Statement or policy, and a Whistleblowing policy.

Health and Safety

We are dedicated to attaining the highest standards of health, safety and fire protection to ensure both customers, employees and visitors on our premises are kept safe. We have a health and safety policy which is applied to all our offices and subsidiaries.

AL colleagues are trained to be aware of health, safety and fire drills and to inform visitors upon their arrival. In addition, it is encouraged that employees have the freedom to speak out on mental health issues to promote awareness or to use confidential services provided either in-house or externally for individual advice.

As a minimum, we expect suppliers to comply with health and safety legislation, abide by applicable local laws whilst certifying their working environment is safe. It is encouraged that suppliers share relevant policies or procedures to demonstrate measures are in place to identify, assess and mitigate risks to all employees, customers and to the public.

Data Privacy and Cyber Security

Cyber security is essential to protect our business activities and meet our obligations to interested parties, including clients, regulators, shareholders, employees, and suppliers. We comply fully with the Data Protection Act 2018 and all personal data is only used for business purposes.

As a minimum, we expect suppliers to conform to all applicable data protection laws, as well as our information and cyber security requirements and standards. To notify us if you suffer a data breach in relation to any personal data of Arbuthnot Latham which has the potential to bring harm to our clients, employees or our business.

Your Thoughts

If you have any feedback relating to AL's Supplier Code of Conduct, please email SupplierManagement@arbuthnot.co.uk