

Quilter



# The Quilter Supplier Code of Conduct



## 1. Introduction

Quilter plc is a leading UK-centric wealth management business, helping to create prosperity for the generations of today and tomorrow.

It has an adviser and customer offering spanning: financial advice; investment platforms; multi-asset investment solutions; and discretionary fund management.

We are committed to the highest standards of governance and conduct in every aspect of our business, and we want to work with suppliers who share this commitment.

This Supplier Code of Conduct ('Code') applies to all suppliers and their sub-contractors that provide goods and services to Quilter. This Code sets out the minimum standards we expect our suppliers to adhere to when doing business with Quilter and is complemented by agreed contractual terms. We also expect our suppliers to promote adherence to these standards through their own supply chain where practical.

Suppliers must be able to demonstrate adherence to the Code if requested by Quilter and we reserve the right to audit suppliers where necessary to assess compliance.

## 2. Standards

### *i) Business conduct*

**Legal compliance** – we expect all our suppliers to comply with all applicable laws and regulations in all the countries in which they operate, and within their supply chains. Where the standards set out in this Code go beyond legal requirements, we expect suppliers to adhere to them unless doing so conflicts with applicable local laws.

**Ethical standards** – we expect suppliers to conduct their business with the highest standards of integrity, honesty and ethical conduct. Suppliers must have the necessary policies, systems and processes in place to prevent unethical conduct, which may include, but not be limited to market abuse, breaches of sanctions legislation, information security, tax evasion, money laundering, fraud, bribery and corruption, and any other improper payments.

**Conflicts of interest** – where a supplier identifies a potential or real conflict of interest, for example with an existing or competing supplier, they must report this to a senior member of Quilter's Procurement and Supplier Management team. The potential conflict can then be assessed and investigated by both parties with an appropriate outcome agreed.

**Anti-bribery and corruption** – we expect suppliers to comply with all applicable anti-bribery and corruption laws in the countries in which they operate, for example the Bribery Act 2010 in the UK, although the Act has extra-territorial reach and catches individuals and companies outside of the UK, if a part of the business operates within the UK. For the avoidance of doubt, suppliers must not participate in unlawful cartels, make political donations or offer inducements, gifts or entertainment to public officials. Similarly, suppliers must not offer or accept inducements, gifts or entertainment, to or from Quilter employees, other than those sanctioned by Quilter management where they will be registered.

**Brands, trademarks and intellectual property** – suppliers must not use Quilter brands or intellectual property in any literature or communication in all forms without our prior permission. Suppliers shall not undertake any work that could infringe any third party's intellectual property rights. Suppliers must indemnify Quilter against losses, damages, costs or expenses and any other liabilities arising from an intellectual property or trademark claim.

**Information and Data Protection** – suppliers must comply with all UK data protection laws applicable in the countries in which they operate. Suppliers must take appropriate measures to protect information and data relating to Quilter from unauthorised access, sharing or modification.

**Business continuity and disaster recovery** – we expect suppliers to manage business continuity risks and assure the availability of their services during a disruptive event. Suppliers should have recovery plans in place for their business and key contractors to continue with minimal interruption should there be a disruption to the services they provide.

### *ii) Labour standards and human rights*

**Legal compliance** – suppliers must comply with all applicable employment laws and regulations such as those relating to pay, conditions, working hours, employment terms and discrimination and strive for best practice where possible.

**Living Wage** – Quilter is an accredited Living Wage employer. As such, suppliers whose employees work on our premises for two or more hours of work a week, for eight or more consecutive weeks in a year must be paid the applicable real living wage hourly rate which is linked to the real cost of living. The rate is reviewed, determined and published annually by the Living Wage Foundation.

**Discrimination** – suppliers must ensure their employees are not discriminated against on the basis of their age, gender, ethnicity, disability, religion, sexual orientation, educational, social and cultural background or other employee characteristics unrelated to their ability to perform their role.

**Modern slavery** – to protect human rights, suppliers must not use child, forced or bonded labour. Suppliers must ensure, where legally allowed, their employees have freedom of association, the right to collective bargaining, have adequate rest periods and not be forced to work overtime. Specifically, suppliers must ensure full compliance with the UK Modern Slavery Act 2015, or similar laws in the countries in which they operate. Suppliers should take appropriate action so as to prevent modern slavery and human trafficking in their own operations and the operations of their supply chains.

**Health and safety** – We expect our suppliers to strive to implement high standards of occupational health and safety by applying a robust health and safety management system appropriate for the business. The supplier shall comply with all applicable occupational health and safety legislation in the countries in which they operate, such as the UK's Health and Safety at Work etc Act 1974, along with the requirements detailed within Quilter document HSP 01 'Contractor Management Guidance' (and associated documents). They will strive to provide a work environment that is safe and conducive to good health in order to preserve the health of employees, safeguard third parties and prevent accidents, injuries and work-related illnesses. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures. Employees are to be adequately educated and trained in health and safety issues

### *iii) Environmental management*

Quilter is committed to environmental protection and to the sound management of its exposure to all environmental risks, including those related to the climate. Suppliers must comply with all applicable environmental laws and regulations and, where appropriate, best practice standards.

Suppliers are expected to adopt appropriate policies and management systems to identify, assess and manage their exposure to all material environmental (including climate-related) risks. Suppliers are also expected to assess, manage and, where appropriate, reduce their impacts, both direct and indirect, on the environment.

On request by Quilter, in relation to the goods and services provided, suppliers must provide relevant environmental information, including information on the supplier's exposure to and management of current or potential climate-related risks (both of a physical and transitional nature). On request by Quilter, suppliers should also provide relevant information regarding the supplier's impact on the environment and management actions taken to mitigate those impacts.

### 3. Reporting

For general queries relating to this Code, suppliers should contact their normal Quilter contact. However, in the event that a supplier has a genuine concern of non-compliance with this Code, or other danger, fraud or other illegal or unethical conduct in the workplace they may report it via our whistleblowing procedure provided by Navex Global. This is independent of Quilter and concerns can be reported anonymously and confidentially. The Freephone hotline, **0800 890 011** is available 24hrs, 365 days of the year with live interpreters available to overcome any potential language barriers (please use code 833-778-1557 at the prompt) or alternatively you can use the secure online portal [quilter.ethicspoint.com](https://quilter.ethicspoint.com). The information given to Navax Global will be passed on to senior executives of Quilter who will act on it without compromising the information provider in any way.

