

# Quilter



## The Quilter Supplier Code of Conduct





## 1. Introduction

In June 2018 our business, Quilter (formerly Old Mutual Wealth), separated from its parent company, Old Mutual, and listed on the London and Johannesburg stock exchanges as Quilter plc.

Together the Quilter group of companies provides financial advice, investments and wealth management in the UK and selected international markets. We offer a multi-channel proposition with peer leading investment solutions for retail clients. We manage £111.6bn on behalf of over 900,000 customers and have over 4,000 employees (as at 31 March 2018).

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 in addition to the contractual terms agreed. 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** – as an absolute minimum we expect all our suppliers to comply with all applicable laws and regulations in all the countries in which they operate. 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 should have the necessary policies, systems and processes in place to prevent unethical conduct, which may include, but not be limited to market abuse, 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 Third Party Risk Management team. The potential conflict can then be assessed and investigated by both parties with an appropriate outcome agreed.

**Anti-bribery and corruption** – we strongly reject corrupt practices and 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. 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 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.

*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 must be paid the applicable real living wage hourly rate which is linked to the cost of living, and is reset 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** – Quilter's suppliers must provide a safe and healthy working environment for their employees and must adhere to applicable health and safety legislation in the countries in which they operate, such as the UK's Health and Safety at Work Act 1974.

*iii) Environmental management*

Quilter is committed to sound environmental protection and management. Suppliers must comply with all environmental laws, regulations and where appropriate best practice standards with respect to their own environmental management. Suppliers are expected to adopt appropriate policies and management systems to identify, manage and reduce direct and indirect environmental impacts. On request by Quilter, suppliers shall provide relevant environmental information in relation to the goods and services supplied. information for financial or other gain.

### 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 Expolink. This is independent of Quilter and concerns can be reported anonymously and confidentially. The Freephone hotline, 0800 374 199 is available 24hrs, 365 days of the year with live interpreters available to overcome any potential language barriers. The information given to Expolink will be passed on to senior executives of Quilter who will act on it without compromising the information provider in any way.

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