



Supplier Code of Conduct

November 2022

1. Principles

At Schroders, we are committed to our values of excellence, innovation, teamwork, passion and integrity. These are the guiding principles that everyone at Schroders uses to navigate the investment world and deliver value to our clients. Our values define our reputation, determine the behaviours we expect of our employees and shape how we do business.

Schroders aims to work with suppliers who align with our values and support our goals. We expect our suppliers to adhere to all relevant legislation and to act responsibly, fairly, ethically and safely at all times. These principles form an integral part of our sourcing activities and decisions.

Our Supplier Code of Conduct sets out the behaviours and high standards we expect from our third party suppliers and their subcontractors.

2. Legal and Regulatory Standards

Schroders require our suppliers to comply with all laws and regulations applicable to its business in the countries in which they operate and seek commitments from their own supply chain to also meet this requirement.

3. Human Rights

Schroders is committed to upholding all laws relating to the protection of human rights including but not limited to the UN Universal Declaration of Human Rights. In line with our statement about Modern Slavery and Human Trafficking (found on our website [here](#)) we are committed to preventing slavery and human trafficking from taking place in our supply chain. We expect our suppliers and their subcontractors to:

- prohibit human trafficking and child or forced labour including modern slavery;
- comply with all applicable wage and working regulations;
- embrace diversity, fairness and inclusion in their workforce/workplace;
- support freedom of association in line with local regulations;
- act ethically and with integrity and require their employees to do the same;
- have robust policies in place that require their employees to adhere to relevant regulations and treat their own employees fairly and ethically;
- have the ability to demonstrate robust procedures are in place to be confident that child labour, slavery or human trafficking is excluded from their supply chain.

4. Ethical Sourcing and Behaviour

Schroders has the corporate responsibility to uphold international labour standards, workers' and human rights and the rule of law, and to enter into relationships based on the principle of fair and honest dealings at all times. This is whether in our role as an employer, as a buyer of goods and services or when carrying out our fiduciary duties as a provider of financial services and an investor in companies.

We expect our suppliers to adopt the same ethical behaviours and we seek to work with organisations who maintain high standards of ethical conduct, treat their employees fairly and promote equality and diversity in employment and service provision. We have governance, policies and processes in place to respect human rights and we have implemented remediation processes to deal with any issues raised.

5. Living Wage

Schroders is proud to be an accredited London Living Wage employer. All our London-based employees, including contractors are paid above the London Living Wage.

We expect, where applicable, our suppliers to adopt and pay the living wage in each of the countries in which it operates and seek the adoption of the local living wage throughout its supply chain.

6. Bribery and Corruption

Schroders expects our suppliers to operate with integrity, comply with the Foreign Corrupt Practices Act, the Bribery Act 2010, the Criminal Finances Act 2017, Proceeds of Crime Act 2002 and UK, UN, EU and US sanctions. Our suppliers should have policies in place to prevent fraud, bribery and corruption, market abuse, money laundering, tax evasion and any other improper payments, or inducements within its business and seek to only work with suppliers that demonstrate similar commitments. Suppliers must not directly or indirectly offer improper payments or inducements to Schroders employees that may give rise to actual, potential or perceived conflicts of interest or engage in any other unethical behaviour.

7. Inclusion and Diversity

Schroders is committed to Inclusion and Diversity. Information about our approach can be found [here](#).

Schroders expects our suppliers to abide by all relevant equality legislation in the countries in which they operate and not discriminate on the basis of age, sex or sexual orientation, gender identity, disability, origin, race, colour, religion or belief in any employment or hiring practices.

When working at Schroders, if suppliers experience or witness any discriminatory actions or comments, we encourage these to be reported using the whistleblowing process below.

8. Whistleblowing

Schroders encourages all suppliers to report any concerns (including suspected wrongdoing) relating to Schroders conduct as soon as possible, in the knowledge that all concerns will be treated confidentially and investigated fully.

Reports can be made via telephone - for a full list of international numbers please visit

<https://www.safecall.co.uk/en/file-a-report/telephone-numbers/>

or via our web-based portal

<https://www.safecall.co.uk>

9. Health and Safety

Schroders is committed to ensuring all employees and on-site suppliers to Schroders are provided with a safe working environment which meets the requirements of the Health and Safety at Work Act 1974.

We expect suppliers to Schroders to provide a safe and healthy working environment for their employees which meets the requirements of all applicable occupational health and safety regulations and to abide by all local laws and regulations including the Health and Safety at Work Act 1974.

Where suppliers are working on our site with our equipment, we expect them to comply with all health and safety training and guidance issued and to help maintain a safe working environment by reporting any issues promptly. Suppliers delivering a service using their own equipment, or servicing on-site equipment, must provide appropriate documentation in advance to demonstrate how safety and health issues will be managed. Suppliers

should ensure their employees receive the appropriate safety instruction and training to keep them safe and well in the workplace and have business management practices in place to address:

- Health and Safety Policy administration;
- hazard identification, risk assessments and relevant procedures;
- fire safety and emergency evacuation procedures i.e., disaster recovery;
- first aid and accident reporting procedures;
- ergonomics;
- clean and safe working conditions.

10. Environment

Schroders recognises the role we play in protecting the environment and minimising our environmental impact. We expect suppliers of Schroders to work together with their supply chains to minimise the environmental impact of their operations and ensure business practices meet all applicable environmental laws and regulations.

We require our suppliers to comply with all applicable environmental legislation and regulations and encourage suppliers to have policies for effective environmental management and to participate in voluntary environmental reporting and certification programs and endorse environmental efforts such as:

- Reducing consumption of greenhouse gas emissions;
- Reducing consumption of gas and electricity and purchasing energy from renewable sources wherever practical and possible;
- Reducing consumption of natural resources and environmentally damaging products and changing to recyclable and sustainable alternatives;
- Effective waste management, targeting recyclable waste and minimising waste to landfill.

11. Confidential Information

Schroders expects any information received by a supplier from Schroders to be held securely with appropriate technical and organisational security in place to safeguard that information to ensure there is no disclosure of the data to any other party without our permission.

12. Data Protection

Schroders expects suppliers to comply with all applicable data protection requirements. Where a supplier is processing personal data on Schroders' behalf, the supplier must enter into appropriate contractual terms governing such data processing (including, among other things, in relation to appointment of sub-processors, audit rights and transfers of personal data outside the UK/EEA), in each case as required by applicable data protection laws.

13. Physical Security

Schroders expects our suppliers and their subcontractors to maintain appropriate physical security arrangements and in particular, suppliers with access to Schroders premises must:

- take responsibility for their own personal safety and take reasonable steps to safeguard the physical security of assets and information for which they are responsible, both in the office and when working remotely;

- ensure that all business paperwork (including confidential papers and other working papers) and valuable or attractive items are removed from desks and put in appropriate overnight storage, secured under lock and key;
- ensure that building access cards are secure at all times, not shared and if lost, reported promptly. Be aware of unauthorised individuals attempting to tailgate through Schroders access control, reporting such incidences immediately;
- be responsible for the safety and security of any visitors they are hosting in Schroder offices and ensure the timely return of any issued visitor pass;
- report security incidents to their line manager and local security administrator at the earliest opportunity.

14. Acceptable Use Policy

Suppliers who have access to the Schroders IT network will be asked to attest to the principles of our Acceptable Use policy when they first log on. This policy sets out individuals' responsibilities in relation to the security and use of:

- Schroders' information: in whatever form, relating to Schroders' business activities globally, and to all information handled by Schroders relating to organisations with whom we deal;
- Information systems and information communications facilities operated by Schroders or on our behalf, including the use of messaging, internet, voice and mobile IT equipment.

Suppliers who do not have access to our network, but are hosting Schroders data externally, may be subject to a security review.

15. Compliance and Measurement

Suppliers must be able to demonstrate compliance with Schroders' Supplier Code of Conduct. Such compliance includes documented evidence and cooperation, upon reasonable notice, with any certification activity to demonstrate compliance with the Code Schroders undertakes.

Where local laws and regulations do not meet the same standards as Schroders Supplier Code of Conduct, Schroders terms take precedence where they do not incur a breach of such local regulation.

Supplier adherence and commitment to this Code of Conduct forms an integral part of Schroders sourcing and monitoring activity and is used along with all other relevant decision criteria when (i) selecting new suppliers; (ii) renewing current contractual relationships; or (iii) monitoring incumbent supplier relationships. In addition, failure to comply with our Supplier Code of Conduct and/or local laws and regulation may result in termination as a Schroders supplier.

Should you have any questions regarding this Code of Conduct please contact:

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