WEATHERBYS
BANKING GROUP

# Supplier Code of Conduct

We work with Suppliers who understand us and look for ways to bring insight and enhancements to our business. All potential Suppliers will be subject to due diligence checks to ensure that our required standards are met as well as our Code of Conduct.

**Purpose of this Code of Conduct:**

The Code of Conduct (the Code) sets out the framework of acceptable conduct Weatherbys Bank Ltd (Weatherbys Bank) expects from its Suppliers, vendors, and all other third-party companies that comprise the Weatherbys Bank's supply chain ("Supplier(s)"). This document is intended to complement our contracts with Suppliers, which will always take precedence.

The Code is based upon our commitment to business integrity and we regard our Supplier base as a critical and necessary extension of our operations and future success and we thank you for continuing to make compliance and integrity a top priority as you work with our business.

All work performed for Weatherbys Bank by a Supplier should be in full compliance with the Code as well as all applicable laws, rules and regulations.

In particular, Weatherbys Bank requests its Suppliers to:

- Extend the principle of fair and honest dealings to all others with whom the Supplier does business, including employees, sub-contractors and other third parties;

- To the extent where reasonably practicable, apply the standards within the Code to the Supplier's own supply chain; and

- Comply with the specific requirements set out within the Code.

Non-compliance or failure to comply with the Code during the course of business with Weatherbys Bank may lead to a review of your suitability as a Supplier.

**Our Commitments:**

- We act with integrity.
- We act with due skill, care, and diligence.
- We are open and cooperative with all our Regulators.
- We pay due regard to the interests of clients and Suppliers and treat them fairly. We observe proper standards of market conduct.
- We take responsible steps to ensure our business is controlled effectively.
- We ensure our business complies with all relevant requirements and regulatory standards. We promote the principles of inclusion and diversity.
- We ensure any delegation of responsibilities are to appropriate colleagues. We disclose appropriately any information of which the FCA or PRA would expect notice.

These are aligned with our Brand Values, which every Weatherbys Bank employee emulates:

**Forward Looking** - A culture of continuous improvement at the heart of everything we do.
**Individual** - Our unique and personal service is centred around our clients and staff.
**Responsive** - Always go above and beyond to meet our clients' needs.
**Straightforward** - make things as easy and simple as possible for ourselves and our clients.
**Trusted** - Integrity lies at the heart of the way we do business.

**Law and regulations:**

Suppliers shall comply with all applicable local and national laws, rules, regulations and requirements in the provision of products and services manufactured and supplied to Weatherbys Bank. It is the Supplier's responsibility to maintain and enforce these standards within its own supply chain.

Suppliers have the responsibility to acquire appropriate knowledge of and to comply with the laws and regulations that apply to their services and their areas of responsibility and to recognise the potential dangers of non-compliance.

Suppliers should consider the position of intellectual property rights in their dealings with Weatherbys Bank and in particular consider the use of Weatherbys Bank's logo and branding and whether this has been approved.

**Conflicts of Interest:**

Suppliers shall avoid any situation where its interests (financial or otherwise) conflict with the contracted duties that it owes to Weatherbys Bank and/or its clients.

A conflict may arise if a Supplier employs or is partially or fully controlled by a Weatherbys Bank employee or his or her family member, or when a Supplier, its employees and its employees' family members receive improper benefits through the Supplier's relationship with Weatherbys Bank.

Weatherbys Bank's Suppliers should not allow a conflict of interest to arise that impacts Weatherbys Bank.

**Ethical Business Practices:**

Suppliers shall comply with all applicable laws and regulations, avoid all exposure to bribery or corruption, and any unethical business practices.

**Business Integrity:**

As a regulated financial services firm, Weatherbys Bank is bound by laws and regulations prescribed by the FCA and PRA which are designed to detect and prevent financial crime and to report any such instance, when it has occurred. In some cases, Weatherbys Bank's obligations extend to persons whom we deal with, even if they are not a financial services firm themselves (i.e. an 'Associated Person'). We expect to be notified by Suppliers of any material financial crime issues (for example, instances of money laundering, terrorist financing, sanctions, tax evasion and fraud) related to our business with our Suppliers.

In addition, Suppliers shall not engage in any form of bribery or corruption or undertake any action that contravenes Weatherbys Bank's policy on combatting bribery or that of the UK's Bribery Act 2010. We respect and promote human rights in every community within which we operate.

We strive to uphold the UN Guiding Principles on Business and Human Rights when we engage with each other, partners, clients and Suppliers.

We are committed to working with all our Suppliers and stakeholders to help end slavery, human trafficking, child labour or any other abuse of human rights.

We do not tolerate any form of human trafficking or modern slavery. More details can be found in our Modern Slavery Statement.

**Wage and Benefits:**

Weatherbys Bank comply with all employment laws and are accredited to, the Living Wage Foundation in the UK. We expect our suppliers to also adhere to the minimum requirements with regard to wages and benefits, meeting both legal minimums and industry standards, without unauthorised deductions.

**Working Hours:**

Suppliers shall ensure working hours comply with national laws and standards and should not expect workers to work (including overtime) in excess of hours set out in relevant working time legislation or other national legal limits unless an opt out has been chosen by the employee with appropriate supporting written evidence.

**Freedom of Association:**

Weatherbys Bank respect the rights of workers to associate or not to associate with any group, as permitted by, and in accordance with, all applicable local and national laws and freedom of association and collective bargaining. We expect our suppliers to support the same rights for their employees and shall not interfere with or discriminate against workers choosing to belong to them.

Where the right to freedom of association and collective bargaining is restricted under national law, Suppliers shall facilitate, not hinder, alternative means of independent and free association and bargaining.

**Discipline and grievances:**

Suppliers shall have in place a grievance and disciplinary mechanism for workers. Weatherbys Bank follow the ACAS Code of Practice on disciplinary and grievance procedures and expect our suppliers to follow the same practices. Outside of the UK any local equivalent requirements should be followed.

**Reporting concerns (Whistleblowing):**

Suppliers are encouraged to report any suspicions or concerns of Weatherbys Bank work-related misconduct or unethical behaviour (e.g. breaches of rules, laws, regulations). Concerns should be reported directly to the Weatherbys Bank General Counsel or to your relationship manager.

Weatherbys Bank will not tolerate retaliation against any person reporting a concern in good faith.

All concerns will be taken seriously and where required a confidential investigation will be conducted in accordance with Weatherbys Bank's Whistleblowing Policy.

**Environmental Responsibility:**

Suppliers shall comply with all applicable environmental laws and regulations and have clear procedures in place to minimise environmental impact, including:

- Efficient use of energy, water, and raw materials.
- Minimizing waste generation and ensuring proper disposal of waste.
- Implementing measures to prevent pollution and reduce emissions.

Suppliers should be actively working towards reducing their carbon footprint. This includes:

- Monitoring and reducing greenhouse gas emissions.
- Utilising renewable energy sources where possible.
- Implementing energy-efficient technologies and practices.

Any direct and indirect environmental impacts, including carbon footprints, associated with the goods and services being provided should be understood, measured, managed and reported to Weatherbys Bank as and when requested.

It is expected that Suppliers shall demonstrate good sustainability practices, such as responsible sourcing and use of resources.

Suppliers shall comply with the Weatherbys Bank sustainable development commitment.

**Health and Safety:**

Suppliers shall provide safe and clean conditions for workers at sites of working, adhering with Health and Safety regulations. Clear procedures shall be in place to ensure regulated occupational health, safety and wellbeing standards are adhered to.

Suppliers shall comply with the Weatherbys Bank Health and Safety Policy.

**Quality and Product Safety:**

Suppliers should commit to delivering products or services of high quality, to the standards expected by Weatherbys Bank.

All products shall adhere to relevant product safety standards and regulations. The Supplier should have in place sufficient processes for reporting and addressing product defects or safety concerns, alerting us in the first instance should any non-compliance be identified.

**Supply Chain Transparency:**

We expect Suppliers to deal fairly with and have adequate oversight of subcontractors and Suppliers in their supply chain.

We do not expect Suppliers to pass down risk inappropriately to subcontractors, or to assert that they can manage risk that is in fact better managed by another party.

All parties should be open and transparent about identifying, assessing and mitigating risks relating to what they supply to us. They should also share intelligence of supply chain risks. This will allow material commercial and operational risks (for example the impact of losing a key Supplier) to be mitigated.

**Social Responsibility:**

An inclusive and diverse work environment is encouraged, with equal opportunities for all workers.

All employees shall be treated fairly and not discriminated against in any form of employment.

Suppliers should not discriminate against any employee based on age, gender, sexual orientation, race, ethnicity, colour, disability, religion, political affiliation, union membership, national origin, marital or pregnancy status during any recruitment or employment activities.

Suppliers shall commit to a workforce free of any harassment or threat of harassment. Any forms or threats of harassment, physical, mental, sexual or verbal, shall be prohibited and not tolerated.

**Confidentiality**:

Suppliers have a responsibility to keep confidential information safe. Suppliers may not disclose any Weatherbys Bank confidential information to anyone except those with a 'need to know'. Confidential information includes any information made available to a Supplier or to its subcontractors and any information relating to Weatherbys Bank and its clients' business that is acquired or accessed while performing its duties for Weatherbys Bank.

Weatherbys Bank confidential information may only be used in the ordinary course of performing contracted services.

**Data Security:**

Weatherbys Bank fully comply with UK GDPR and Data Protection Act 2018 and all personal data is used only for business purposes.

As a minimum, suppliers shall comply with applicable data protection laws and regulations, as well as our cyber security requirements and shall not do or omit to do anything which would put Weatherbys Bank in breach of such laws and regulations. All suppliers are under an obligation to notify us of data breaches immediately.

**Business Continuity and Risk Management:**

Suppliers should have in place sufficient processes to ensure, as far as possible, uninterrupted supply of products and services as per any current agreement.

Where disruption occurs, plans should detail how they will overcome and the timing for restoration, whilst mechanisms for prompt reporting of any incidents that may affect the supply chain are relayed to us in the first instance. From time to time, we may wish to conduct audits or assessments to ensure compliance, and Suppliers shall provide all relevant documentation on request.

**Continuous Improvement:**

In line with Weatherbys Bank's values, we expect our Suppliers to commit to ongoing improvement in ethical, environmental, and social performance.

These are important tools for promoting responsible business practices throughout the supply chain.

**Compliance with this Code:**

Suppliers should commit to complying with the Code to uphold these principles and are expected to be able to demonstrate compliance with the Code.

Any policies referenced above are available on request.

**For any further information, please contact: suppliers@weatherbys.bank**