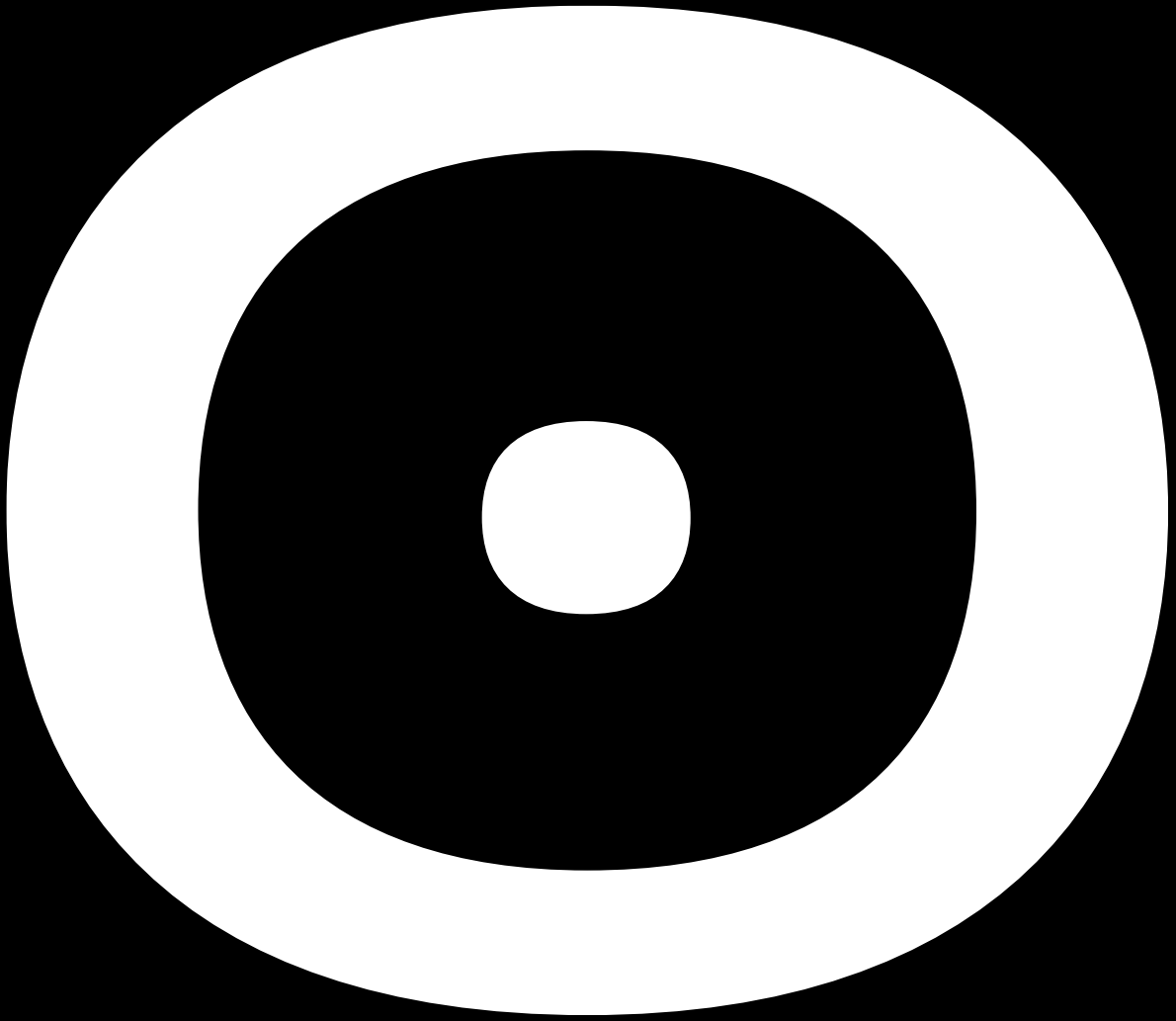


Rothestay



Supplier Code of Conduct

Rothestay

# Introduction

Rothesay<sup>1</sup> is one of the UK's largest pensions insurance specialist, purpose-built to protect pension schemes and their members' pensions. We are committed to ensuring that the highest professional standards are met at all times. Rothesay is committed to meeting both the spirit and the letter of our wide-ranging regulatory obligations and legislation. The standards we set for ourselves introduce a deep commitment to integrity, fairness and accountability that extends far beyond regulatory compliance.

All our employees attest to complying with our Compliance Standards, applying wherever and whenever we do business. We also extend this high standard of expectations to all entities with whom we work, across our supply chain.

The Rothesay Supplier Code of Conduct outlines the expectations we have of the suppliers with whom we work. The Code's purpose is to set clear standards around the expectations we have for our suppliers and is applicable to all suppliers which provide formal provision of goods or services to Rothesay.

Rothesay recognises that our suppliers may operate in different jurisdictions with varying legal and cultural expectations. This Code of Conduct represents the minimum conduct behaviours we look for in our suppliers. We ask all suppliers to attest to operate in line with this Supplier Code of Conduct, as part of the vendor on-boarding process.

## Our Commitment to Our Suppliers

In line with our expectations of our suppliers, Rothesay also commits to the below standards of behaviour for all dealings with current and prospective suppliers.

Rothesay commits to:

- Treating suppliers fairly, acting with due care and integrity in our dealings.
- Ensuring our communications are clear, timely and meet our high expectations of integrity.
- Fostering long-term relationships with our critical suppliers and avoid making demands of our suppliers that might lead to them violating appropriate standards of behaviour and human rights.
- Paying suppliers in line with our contractual agreements and providing clear guidance on the payment process.
- Undertaking vendor selection with due diligence and fair process.

---

<sup>1</sup> Throughout this document, "Rothesay" refers to Rothesay Life Plc. Rothesay is the trading name for Rothesay Life Plc, a UK insurance company authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Firm Reference Number: 466067. Rothesay Life Plc is registered in England and Wales with company number 06127279. Registered office: The Post Building, 100 Museum Street, London, WC1A 1PB.

# Supplier Expectations

## 1. Ethics

Rothesay is committed to maintaining the highest standards of integrity, transparency and accountability. We expect the same level of ethical behaviour from our suppliers. We expect our suppliers to:

- Meet expectations for all applicable financial crime laws and regulations including preventing bribery and corruption, such as, but not limited to, the Bribery Act 2010.
- Fully comply with all relevant lawful sanctions regimes.
- Have appropriate anti-corruption policies and programs in place.
- Avoid any situations where their behaviour could be viewed as anti-competitive.
- Disclose through appropriate channels any actual or potential conflicts of interest that may exist.
- Raise any concerns around behaviour that goes against this Code of Conduct.

## 2. Data Protection

Rothesay is committed to meeting all requirements of data protection legislation in relation to the handling, processing, storage and disposal of personal data and sensitive personal data. We expect our suppliers to:

- Comply with all data protection measures put in place.
- Not use or disclose any Rothesay-owned information, except as clearly authorised. This includes meeting all contractual obligations, including non-disclosure agreements where applicable.
- Immediately inform Rothesay if there is any potential or actual breach relating to Rothesay-owned information.

## 3. Environment

As per our public climate commitments, Rothesay is committed to operating in a sustainable manner. This applies to our supply chain, with an expectation that suppliers operate in a manner that has due regard for impact on the environment. We:

- Expect our suppliers to comply with all relevant environmental regulatory requirements.
- Encourage all our suppliers to disclose their Scope 1 & Scope 2 emissions, and to take steps to proactively reduce the impact of their services, products and own operations on the environment.

## 4. Human Rights & Modern Slavery

Rothesay have a public Modern Slavery Statement that outlines the steps which we take to ensure slavery and human trafficking is not taking place in any part of our business, including in any part of our supply chains. As part of this, we expect our suppliers to:

- Operate in a manner that respects all internationally protected human rights, guided by provisions outlined in the United Nations Universal Declaration of Human Rights and the International Labour Organisation core labour standards.
- Comply with the Modern Slavery Act (2015). We require all our suppliers as part of the annual review process to confirm their commitment to ensuring their business is free of slavery.

## **5. Working Environment**

All employees are entitled to a workplace which is safe and healthy. We are committed to ensuring this applies across all our operations, and extends to expecting the same standards of the suppliers with whom we work. We expect our suppliers to:

- Comply with all relevant health and safety laws and regulations, in all countries in which they operate and commit to ensuring the maintenance of a safe working environment through regular review.
- Promote a workplace which is free of harassment, bullying and offensive behaviours.

## **6. Diversity & Inclusion**

Rothesay is committed to providing and promoting equal employment opportunities for everyone. Concern for the personal dignity and individual worth of everyone is an indispensable element in our standard of conduct and also applies to our expectations of our suppliers. We expect our suppliers to:

- Comply with any D&I laws and regulations in business relevant jurisdictions.
- Facilitate equal employment opportunities to all qualified persons without regard to race, sex, marital/civil partnership status, sexual orientation, disability, religion or belief, gender reassignment, age, or any other impermissible criterion.

## **7. Local Community**

Rothesay is committed to supporting the local communities in which we operate. We encourage our suppliers to:

- Actively support their local communities.
- Support their employees to undertake work for community activities.

## **8. Compliance**

- Our suppliers should comply with all applicable laws and regulations in all jurisdictions in which they have a presence. Suppliers should conduct themselves in line with both the letter and the spirit of such laws and regulations.
- We encourage suppliers to consider similar behavioural commitments and best practice when considering their own supply chains.