



Supplier Code of Conduct

1. Introduction

Operating with integrity governs our approach and therefore our aspiration to be recognised by our stakeholders as an organisation which is a responsible corporate citizen in all our relationships.

By collaborative working we believe we can jointly have a positive impact on society.

Our vision is to become the best loved and most successful savings and investment business. Our business is built on core values of care and integrity.

Care. We act with care – treating customers, clients and colleagues with the same level of respect we would expect for ourselves. And we invest with care, making choices for the long term.

Integrity. We empower our people at M&G PLC to do the right thing, honouring our commitments to others and acting with conviction. Our business is built on trust, and we don't take that lightly.

The following guidelines set out the framework of acceptable conduct M&G PLC expects from its suppliers, vendors and all other third party companies that comprise the M&G PLC supply chain ("Supplier(s)").

These guidelines are based upon our commitment to 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 M&G PLC by a Supplier must be in full compliance with this Supplier Code of Conduct and all applicable laws, rules and regulations.

In particular, M&G PLC expects 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 Supplier Code of Conduct to the Supplier's own supply chain; and
- Comply with the specific requirements set out within this code.

Non-compliance or failure to comply with the Supplier Code of Conduct during the course of business with M&G PLC may lead to your disqualification as a Supplier.

2. Laws and regulations

Suppliers will comply with all applicable local and national laws, rules, regulations and requirements in the provision of products and services manufactured and provided to M&G PLC. This includes compliance with the International Labour Organisation (ILO) Core Conventions. 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.

3. Conflicts of Interest

Suppliers must avoid any situation where its interests (financial or otherwise) conflict with the contracted duties that it owes to M&G PLC and/or its clients.

A conflict may arise if a Supplier employs or is partially or fully controlled by an M&G PLC 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 M&G PLC.

M&G PLC Suppliers should not allow other interests to conflict with acting in the best interests of M&G PLC.

4. Confidential Information

Suppliers have a responsibility to keep confidential information safe. Suppliers may not disclose any M&G PLC 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 M&G PLC and its clients' business that is acquired or accessed while performing its duties for M&G PLC.

M&G PLC confidential information may only be used in the ordinary course of performing contracted services.

Any Supplier contracted to work on behalf of M&G PLC, for example as a consultant or an employee on a short term contract, shall be required to read and comply with the terms of all M&G policies, standards and procedures where applicable.

5. Data Privacy

All Suppliers are expected to respect any applicable Data Privacy laws and regulations and ensure that personal data handled on behalf of M&G PLC or its clients is processed by implementing appropriate technical and organisational measures to protect such personal data.

This includes protecting personal data from accidental or unlawful destruction, loss or alteration, unauthorised disclosure or access, where the processing involves transmission of data over a network, and against all other unlawful forms of processing.

6. Child labour

Suppliers shall ensure that no underage labour is used in the production or distribution of goods and services to M&G PLC. A child is any person under the minimum employment age according to the laws of the country where the product (or parts of) or services are sourced from, or, in the absence of law, is under the minimum age for completing mandatory education.

7. Forced labour

Suppliers will not use or tolerate in their supply chain any form of slavery, servitude, indentured, bonded, involuntary prison, military or compulsory labour or any form of human trafficking.

All work must be conducted voluntarily and without threat of any penalty or sanctions.

No employee government-issued identification, passports or work permits will be retained by the Supplier as a condition of employment.

Workers' rights to leave the workplace after their shift or to terminate their employment after reasonable notice and receive owed salary must be recognised by the Supplier. This applies to local or migrant employees.

Suppliers are asked to report immediately to M&G PLC any incidents of slavery or human trafficking found in its business or supply chain.

8. Freedom of Association

Suppliers shall 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. Suppliers 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 will facilitate, not hinder, alternative means of independent and free association and bargaining.

9. Discrimination

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

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

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

10. Wages and benefits

Wages and benefits must meet legal minimums and industry standards without unauthorised deductions.

11. Working hours

Suppliers must 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.

12. Healthy and safe working conditions

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

Suppliers must comply with the M&G PLC Health and Safety policy.

13. Environment

Suppliers must have clear procedures in place to ensure direct and indirect environmental impacts associated with the goods and services are understood, measured and managed.

Suppliers must comply with the M&G PLC Environment policy.

14. Business integrity

Suppliers shall not engage in any form of bribery or corruption or undertake any action that contravenes the M&G PLC Anti-Bribery and Corruption policy.

15. Discipline and grievances

Suppliers must provide a grievance mechanism for workers and their organisations to enable workers to raise workplace concerns anonymously. The mechanism must be transparent and set out clearly how grievances will be assessed and feedback provided. Workers and their representatives must be informed clearly how the scheme operates and its scope and that it is equally accessible to all workers.

Disciplinary procedures shall be clearly documented, communicated and easily accessible to all workers. All disciplinary matters shall be recorded including evidence that the worker knew and understood what he/she was accused of and given the right to trade union or other appropriate representation at disciplinary meetings which may lead to significant disciplinary penalties or dismissal.

16. Compliance with Code

Suppliers must be able to demonstrate compliance with the M&G PLC Supplier Code of Conduct. This includes documented evidence and the right of M&G PLC or a designated firm to conduct audits. Audits to include facility inspections, review of Supplier records business practices and conducting employee interviews.

17. Reporting concerns (Whistleblowing)

In relation to 2. to 15. above Suppliers are encouraged to report any suspicions or concerns to M&G PLC. Concerns can be reported directly to the M&G PLC Whistleblowing Operations Manager at mandgspeakout@mandg.com, to your relationship manager or via a whistleblowing helpline EthicsPoint. This is provided by Navex Global a third party service provider and enables whistleblowing concerns to be reported by telephone or an online platform, where reports can also be made anonymously.

Link: <https://secure.ethicspoint.eu/domain/media/en/gui/105606/index.html>

Our UK based Suppliers, their employees and sub-contractors may also make protected disclosures to the Financial Conduct Authority (FCA). It is possible to report a concern using the firm's internal arrangements and also to the FCA; these routes may be used simultaneously or consecutively: Telephone: +44 (0)20 7066 9200 Email: whistle@fca.org.uk Post: Intelligence Department The Financial Conduct Authority 25 The North Colonnade London E14 5HS

M&G PLC will not tolerate retaliation against any person reporting a concern in good faith.

18. Extending M&G PLC's values and behaviours to our Suppliers

At M&G PLC we want people to take care in how they do things, to customers and colleagues and to act with fairness and integrity at all times.

We've built our culture around four key behaviours that define what we expect from everyone across our business.

- Inspire others. Support and encourage each other, creating an environment where everyone can contribute and succeed.
- Embrace change. Be open to change, willing to be challenged and able to adapt quickly and imaginatively to new ideas.
- Deliver results. Focus on performance, set high standards and deliver with energy and determination.
- Keep it simple. Cut through complexity and bureaucracy, be clear and decisive and never overcomplicate things.