



# Supplier Code of Conduct

# About M&G

## Who M&G are

**We help people manage and grow their savings so they can live the life they want.**

### **Our vision**

We want to become the best loved and most successful savings and investments business. This places a big responsibility on us to be exceptional everyday, delivering results, but in a way that focuses on providing customers with the best possible experience.

### **Our culture**

Developing and nurturing our culture is critical to running a strong business with the capability to grow and take its place in the economy and society. To achieve our vision, it is important that we understand our expectations as one M&G team. We have a clear ambition of how we want to feel everyday when we come together. We are one team, aligned around one purpose, one vision, and one mission. We set the bar in how our culture delivers for each other, our clients, and our customers, delivering the excellent service we all expect and making our people's working life engaging and enjoyable.

### **We live our culture through our values**

Our core values guide us in everything that we do, providing the foundation for our culture.

#### **We act with care**

We treat customers, clients, and colleagues with the same level of respect we would expect for ourselves. We also invest with care, making choices for the long-term.

#### **We act with integrity**

We empower each other 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.





Our core values and supported by key behaviours that underpin everything we do. They define how we work together and what we expect of each other day to day.

### We practice our key behaviours everyday

#### We Inspire Others

We support and encourage each other, creating an environment where everyone can contribute and succeed.

#### We Embrace Change

We are open to change, willing to be challenged and able to adapt quickly and imaginatively to new ideas.

#### We Deliver Results

We focus on outcomes, setting high standards, and delivering with energy and determination.

#### We Keep It Simple

We cut through complexity and bureaucracy, being clear and decisive and never overcomplicating things.

### Aligning with Our Regulators

We diligently adhere to our behaviours because it is the right thing to do, also allowing us to exceed performance expectations and deliver exceptional service to our customers and clients. To lead in a global society and meet regulatory obligations we are accountable and commit to the following:



We act with integrity.



We act with due skill, care, and diligence.



We are open and cooperative with all of our regulators.



We pay due regard to the interests of customers and treat them fairly.



We observe proper standards of market conduct.



We take responsible steps to ensure our business is controlled effectively.



We take steps to ensure that our business complies with requirements and regulatory standards.



We take steps to ensure that any delegation of responsibilities are to appropriate colleagues and overseen effectively.



We disclose appropriately any information of which the FCA or PRA would expect notice.

# Our Supplier Code of Conduct

## Our Suppliers

**We work with suppliers who take time to understand our business and look for ways to bring insight and enhancements. By strengthening the way we do business, we can then look to generate innovative products, services and solutions for our customers. All potential suppliers will be subject to due diligence to ensure that our required standards are met.**

### **Purpose of the Supplier Code of Conduct**

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)”). This document is not intended to undermine, but to complement, our contracts with suppliers and the rules we set out when we procure our goods and services, which will always take precedence.

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.



## 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.

## 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.

## 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.

## Data protection

Suppliers shall comply with applicable data protection laws and regulations and shall not do or omit to do anything which would put M&G plc in breach of such laws and regulations.

Suppliers shall 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. Suppliers are asked to report immediately to M&G plc any such incidents.

## Business integrity

As an international financial services firm, M&G is bound by laws and regulations designed to detect and prevent financial crime and reporting, where necessary, when it has occurred. In some cases, M&G's obligations extend to persons whom we deal with, even if they are not a financial services firm themselves (ie an 'Associated Person'). We expect to be notified of any material financial crime issues (for example, instances of money laundering, terrorist financing, sanctions, tax evasion and fraud). In addition, suppliers shall not engage in any form of bribery or corruption or undertake any action that contravenes the M&G plc's policy on combatting bribery or that of the UK's Bribery Act 2010.

As a global company, we operate within many countries and communities. 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 aim to comply with local laws and regulations in every jurisdiction where we operate and strive to uphold the principles and expectations outlined in our Statement of Human Rights.

Our suppliers are a critical and necessary extension of our operations and future success. We hold our suppliers to the same ethical standards to which we hold ourselves and require our suppliers to remain in full compliance with all applicable laws, rules, and regulations.

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.

- **Child labour** – we do not tolerate underage or child labour.
- **Forced labour** – we do not tolerate any form of forced servitude or indentured, bonded, involuntary prison, military, or compulsory labour. We do not tolerate any form of human trafficking or modern slavery. More details can be found in our Modern Slavery Transparency Statement.

Suppliers are asked to report immediately to M&G plc any incidents of child labour, forced labour, slavery or human trafficking found in its business or supply chain.

### 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.

### Discipline and grievances

Suppliers must have in place a grievance and disciplinary mechanism for workers and their organisations. In the UK these mechanisms should follow the Acas Code of Practice on disciplinary and grievance procedures, outside of the UK any local equivalent requirements should be followed.

### 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.

### Wages and benefits

Wages and benefits must meet both legal minimums and industry standards without unauthorised deductions. In the UK, Living Wage Foundation minimum requirements must also be met.

### 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.

### 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 well-being standards are adhered to.

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

## Environment

Suppliers must have clear procedures in place to ensure direct and indirect environmental impacts, carbon footprint, associated with the goods and services are understood, measured, managed and reported to M&G at least on an annual basis.

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

## Reporting concerns (whistleblowing)

Suppliers are encouraged to report any suspicions or concerns of M&G plc work-related misconduct or unethical behaviour (eg breaches of rules, laws, regulations). Concerns should be reported directly to the M&G plc Whistleblowing Operations Manager at [mandgspeakout@mandg.com](mailto:mandgspeakout@mandg.com) to your relationship manager or via 'Speak Out' (EthicsPoint), the confidential reporting service. This is provided by Navex Global a third-party service provider and enables whistleblowing concerns to be reported by telephone or an online platform. Reports can also be made anonymously where permitted under local legislation.

M&G plc 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 M&G plc's 'Speak Out' whistleblowing programme. Where investigation of concerns requires the assistance of the Supplier, we would request cooperation to the extent possible.

While we encourage Suppliers, their employees, and sub-contractors to raise concerns directly through one of the above routes, and initially reporting directly is the preferred method, concerns can also be raised to the appropriate regulators in accordance with local law. However, in the UK it is possible to raise concerns simultaneously or consecutively to the **Financial Conduct Authority (FCA)**.

Any questions relating to M&G's whistleblowing programme can be directed to the M&G plc Whistleblowing Operations Manager at [mandgspeakout@mandg.com](mailto:mandgspeakout@mandg.com)

## Supply chain risk management

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.

## 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.

