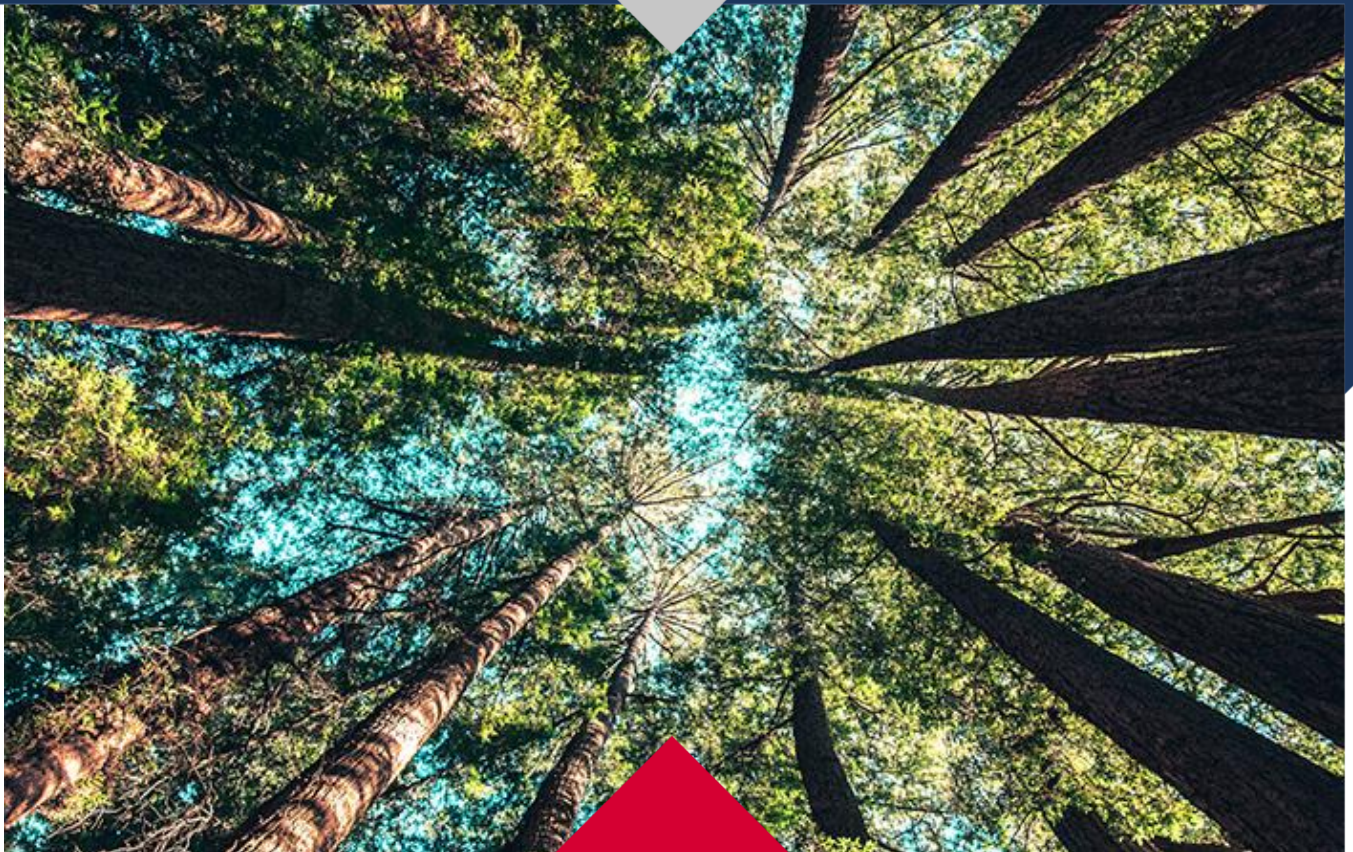


Code of Conduct for Suppliers

Allfunds Bank



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Changes and Updates:

Version	Date	Author	Changes performed
1.0	July 2019	Corporate Social Responsibility	Version 1
2.0	April 2021	Corporate Social Responsibility	Version 2

Approvals:

Governance	Entity	Date
Executive Committee	ALLFUNDS BANK, S.A.U. AND AFFILIATES	July 2019
CSR Committee	ALLFUNDS BANK, S.A.U. AND AFFILIATES	

Introduction

Ever since it was created in 2000, the ALLFUNDS BANK GROUP has developed its leadership and decision-making strategy based on ethical and socially responsible values, in accordance with the seven principles of social responsibility established by the ISO 26000 standard: accountability, transparency, ethical behaviour, respect for stakeholder interests, respect for the rule of law, respect for international norms of behaviour, respect for human rights.

The **ALLFUNDS BANK GROUP** considers that its main contribution to society consists in developing a business activity that encourages sustainable development pursuant to the highest ethical and legal standards and with respect for the environment.

In order to help suppliers understand the **ALLFUNDS BANK GROUP**'s commitment to its socially responsible ethical values, and comply with the regulations in force in each of the countries where the entity operates (e.g., compliance with the [Modern Slavery Act 2015](#) in the United Kingdom), the **ALLFUNDS BANK GROUP** has developed the Code of Conduct for Suppliers (**the Code**).

Considering the diversity of economic conditions and customs that affect commercial practices of the **ALLFUNDS BANK GROUP** in the different parts of the world, suppliers should operate, at least, in an ethical manner and in accordance with the Code.

The principles established in this Code are taken into account while hiring new suppliers, as well as concerning the maintenance of the contractual relationships between the **ALLFUNDS BANK GROUP** and its suppliers.

Scope

This Code applies to all suppliers that provide products or services to the **ALLFUNDS BANK GROUP**.

Suppliers' Commitment

Legal Compliance

The **ALLFUNDS BANK GROUP** expects all suppliers it works with to:

- Comply with the laws and regulations in force in the place where they manage their operations or provide their services.
- Keep up with all legal obligations, and regularly verify compliance therewith.
- Make all reasonable efforts to enforce the laws and regulations that apply to the supply chain.

- Specifically guarantee their compliance with the labour regulations governing their business, production process and supply chain, in particular concerning aspects that are not related to discrimination and fair working conditions.
- Respect the ethical codes and best practices of the industry to which their services belong.
- In general, always operate in an ethical, transparent, accountable and respectful manner according to the standards of an integral and ethical conduct.

Respect for Human Rights

The **ALLFUNDS BANK GROUP** respects human rights and acknowledges both their importance and universality that are indivisibly applicable in all countries, cultures and situations where the company operates.

Therefore, the company expects its suppliers to:

- Respect and encourage the rights established in the [Universal Declaration of Human Rights](#) across their supply chain. Accept that these rights are universal, that is, that they apply in all countries, cultures and situations.
- Act if human rights are not protected, and avoid benefiting from such situations of helplessness or vulnerability. In these situations, suppliers are expected to apply the principle of respect for international standards of conduct.
- They cannot contribute to modern slavery under any circumstances. Modern slavery shall include human trafficking, forced labour, servitude, forced or servile marriage, descent-based slavery and domestic slavery.

Work practices

The **ALLFUNDS BANK GROUP** expects its suppliers to implement good labour practices and treat their workers fairly pursuant to local laws and regulations. Suppliers must also comply with the following principles and enforce them across their supply chain.

- **Freedom of association and collective bargaining:** Suppliers must acknowledge and respect the rights of their workers to organise collectively into trade unions, in accordance with local labour legislation and practices established by the International Labour Organization Conventions.
- **Forced labour:** Suppliers should not incur nor benefit from the use of forced or compulsory labour. Nobody should be required to perform a job or service under threat of punishment or to perform it involuntarily.
- **Child labour:** Suppliers must ensure that child labour is not used in the performance of their activities. In this regard, they must always comply with the [minimum age requirements](#) for admission to work of the International Labour Organization (ILO) and the provisions established by the United Nations in the Convention on the Rights of the Child.

Suppliers must protect children from dangerous or exploitation working conditions. If they discovers a case of child labour across their operations, supply chain or sphere of influence, they should remove the child from work and, where possible, offer appropriate alternatives, especially education.

- **Non-discrimination:** Suppliers must not support nor engage in discrimination in recruitment, remuneration, access to training, promotion, firing or retirement based on race, social or national origin, caste, birth, religion, disability, gender, sexual orientation, family responsibility, marital status, union membership, political opinions, age or any other condition that may give rise to discrimination.
- **Disciplinary measures:** Suppliers should treat all their employees with dignity and respect. They must not practice nor tolerate the use of corporal punishment, mental or physical coercion, or verbal attacks on employees. Severe or inhumane treatment is not allowed.
- **Working hours:** Suppliers must comply with applicable laws and industry regulations on working hours and holidays. The normal working week, not including overtime, must respect the provisions established in the legislation of the country where suppliers carry out their activity and, where appropriate, in the applicable bargaining agreement.
- **Remuneration:** Suppliers must respect the right of staff to a minimum wage and ensure that wages paid for a normal working week always meet at least the legal or industry standards and are sufficient to cover the basic needs of the staff and provide some sort of discretionary spending capacity.

Slavery and Human Trafficking

Suppliers of the **ALLFUNDS BANK GROUP** must abide by the regulations that prohibit human trafficking and comply with the local legislation in force in the country or countries in which they operate, including, but not limited to, the [Modern Slavery Act 2015](#) of the United Kingdom.

Suppliers should make sure the necessary measures have been implemented to guarantee that their business operations are free from slavery and human trafficking practices, whether in the UK or elsewhere, both internally and across their supply chains and other external business relationships.

Anti-bribery and Anti-corruption Measures

The **ALLFUNDS BANK GROUP** does not tolerate any form of corruption, bribery (neither received nor given) or extortion, of a public or private nature in any of the activities it carries out, avoiding the use of unethical practices or of practices likely to influence the will of people not belonging to the organisation to obtain some sort of benefit, advantage or consideration. Therefore, suppliers must enforce policies and procedures that avoid:

- Participation in any form of corrupt practice (such as theft, fraud, conspiracy to defraud, blackmailing, participation in a criminal organisation) under any circumstances.

- Compromising with their conduct compliance with the Gifts and Invitations Policy or with the general code of conduct from the employees of the **ALLFUNDS BANK GROUP**.

Furthermore, suppliers of the **ALLFUNDS BANK GROUP** undertake not to participate in any practice that may involve money laundering or terrorist financing, including suspected cases of tax evasion punished by law.

Health and Safety

Suppliers of the **ALLFUNDS BANK GROUP** must comply with applicable local and national laws and regulations related to health and safety. Based on this, suppliers will provide a healthy and safe work environment for all their employees and visitors in accordance with international standards and the national legislation of the countries where they operate. They should also take the necessary precautions to prevent accidents and injuries arising from, related to, or occurring in the course of their trading activities.

Suppliers must apply appropriate policies and procedures related to health and safety in the work environment. They must provide adequate training on health and safety at work to their employees and staff working on their behalf or under their instructions. The causes of hazards inherent to the work environment should be removed and, if they cannot be removed, they should be evaluated and preventive measures should be taken in this regard.

Information Security

Suppliers of the **ALLFUNDS BANK GROUP** should guarantee the security of information, and provide support to the organisational structure, human and technical resources, processes, procedures related to prevention and response measures against security risks of a logical and physical nature.

To achieve this purpose, suppliers should implement a series of technical and organisational controls that can help guarantee the **confidentiality, integrity, availability, authenticity** and **traceability** of the information.

They must guarantee their crisis management processes, business continuity and the resilience of the organisation, as well as their compliance with the corresponding regulations and good corporate governance.

Furthermore, the implemented model should establish the necessary framework to achieve maximum efficiency and the best practices to coordinate these activities and services.

Environmental Practices

Suppliers of the **ALLFUNDS BANK GROUP** must be committed to environmental sustainability and the fight against climate change, taking into account aspects such as:

- The environmental legislation that applies to their activity.
- The handling and proper disposal of waste and hazardous products.
- The use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination), the emission or discharge of any pollutant or residue, in order to reduce adverse environmental impacts.

Monitoring and Compliance

Suppliers who wish to hold business relationships with the **ALLFUNDS BANK GROUP** must abide by the provisions of this Code of Conduct.

All suppliers of the **ALLFUNDS BANK GROUP** should define their own processes to monitor and supervise compliance with the provisions of this Code within their organisation, business and supply chain. If a supplier identifies areas of non-compliance, they agree to inform the **ALLFUNDS BANK GROUP** of their plans to solve it.

Without limiting the foregoing, in the event that a supplier becomes aware of any act of slavery or human trafficking by themselves or by any of their subcontractors or suppliers, they will notify it without delay and will cooperate reasonably in any investigation related thereto.

The **ALLFUNDS BANK GROUP** reserves the right to request additional information from suppliers regarding their efforts to comply with the provisions of this Code, in general, and with the [Modern Slavery Act 2015](#) of the United Kingdom, in particular.

Based on the assessment of the information made available to the **ALLFUNDS BANK GROUP**, the company reserves the right (in addition to all other legal and contractual rights) to disqualify any potential supplier from participating in the bidding process or from requesting purchases, and/ or to terminate any contractual relationship with any current supplier found to be in breach of the content of this Code.

Approval, Review and Validity

This General Code of Conduct shall be reviewed and approved at the half-year meeting of the Corporate Social Responsibility Committee and, where applicable, it may be updated by the CSR and Compliance Departments.