Supplier code of Conduct

Legal & General
Supplier Code of Conduct

Introduction

Legal & General are acutely aware of how our business impacts on society and the environment. We are proud of being a company that does business responsibly and ethically. We believe that the decisions we make today define our customers' lives tomorrow, we therefore have policies, processes and controls which form our Code of Conduct and reflect our commitment to:

1. Protecting the environment
2. Protecting the employee
3. A safe and healthy workplace
4. Equality, Diversity and Inclusion
5. Ethics
6. Community Involvement
7. Compliance

Our Code of Conduct extends to how we do business with our suppliers and we commit to:

- Treating suppliers fairly and objectively at all times
- Paying suppliers in accordance with the agreed terms and dealing with any exceptions in a timely manner
- Selecting suppliers without prejudice.
- Working with our suppliers to support improvements in their social and ethical practices
- Continuously improving our knowledge of socially and environmentally responsible supply chain management practices
- Maintaining a supply chain that reflects and aligns to our own standards of conduct for how we do business

We strive to work with like-minded businesses; we therefore require suppliers to comply with our Supplier Code of Conduct at all times and be able to demonstrate compliance. The purpose of our Supplier Code of Conduct is to clarify and safeguard the relationships between us and our suppliers, to establish standards that ensure our suppliers operate ethically, are environmentally responsible and that workers are treated with respect and dignity. Our suppliers must have processes in place to maintain these standards and be able to provide evidence if required.

1. Protecting the environment

We're a services based company that uses natural resources to run our business. We are acutely aware how our action impacts the climate. Our strategy is to build resilience and do more each year with fewer natural resources. We require our suppliers to consider their impact on the environment.

Targets

We would encourage all our suppliers to provide positive solutions to reduce the effects their products, services and delivery processes have on the environment.
Environmental Impact
As a minimum, suppliers must comply with all applicable environmental regulatory requirements and employs reasonable measures to mitigate any adverse impacts its products and services may have on the environment.

Where we classify a supplier as having either a high or medium environmental impact, they must have policies and procedures in place to manage these risks.

2. Protecting the employee

We support the protection of human rights through our supply chain by requiring our suppliers to adhere to and provide evidence of compliance with the requirements of the Ethical Trading Initiative Base Code (ETI). We also comply with the Modern Slavery Act 2015 and require our suppliers to do the same. ETI Base Code

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour must not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

Further details on the ETI Base Code can be found at https://www.ethicaltrade.org/eti-base-code

Modern Slavery Act 2015 (MSA)
We require our suppliers to comply with the MSA where applicable at all times. The Act is designed to tackle slavery and human trafficking. Link to: Modern Slavery Act 2015.

3. A safe and healthy workplace

We are committed to ensuring that the health and safety risks to our policyholders, employees and contractors which arise from our operations are reduced as far as is reasonably practicable.

Health and Safety

Our suppliers must comply with all relevant health and safety laws and regulations, both in letter and in spirit, in all the countries in which they operate. We expect our suppliers to provide all their employees with adequate information and instruction on health and safety matters and to enable their employees to meet their responsibilities for the maintenance of a safe and healthy workplace.

4. Equality, Diversity and Inclusion

We commit to promoting a culture of enabling a supply chain that includes equality, diversity and inclusion. We would encourage suppliers to consider equality, diversity and inclusion in their decision making and supplier selections, including actively supporting supplier programmes that look to ensure a diverse employee base.
Employee Discrimination

We require that the employees of suppliers should be protected from discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

Gender Pay Gap

We require that the employees of suppliers should be protected from any discrimination or monetary inequality irrespective of gender.

Supply Chain

We would encourage and promote our suppliers to review the extent of equality, diversity and inclusion within their own supply chain and sourcing decisions. We believe our suppliers should work with diverse businesses and enact inclusive sourcing within their own organisations.

5. Ethics

We aim to establish mutually beneficial relationships with our suppliers, based on the same high ethical standards of openness, professionalism and honesty that we apply to all of our dealings. We expect suppliers to compete on the same basis with regard to the price and quality of their products and services.

We operate a Whistleblowing hotline and mailbox, for concerns in relation to conduct within Legal & General, including:

• Criminal activity
• A failure to comply with a legal or professional obligation
• A miscarriage of justice
• Dangers to health and safety
• Damage to the environment
• Behaviour that harms, or is likely to harm, the reputation or financial wellbeing of our Group
• A breach of PRA / FCA rules
• A breach of our policies and procedures
• Deliberate concealment of any of the above

Report via whistleblowing@landg.com or call 0800 072 5281.

Conflicts of Interest

Our Suppliers must make us aware of any actual or potential conflicts of interest. Our suppliers should declare if it believes one of our employees or contractors has an interest or economic tie to the supplier’s organisation.

Data Protection

Our suppliers should not use or disclose any information belonging to us, our existing and prospective customers, other suppliers, employees or other third parties, except as required or authorised by us.
Bribery and Corruption

We expect our suppliers to maintain ethical controls over their procurement activity which ensures no risk of bribery or corruption within their personnel and their supply chains. Suppliers must comply with anti-bribery and anti-corruption law including but not limited to the Bribery Act 2010.

6. Community Involvement

We encourage our suppliers to have an active community involvement programme. Suppliers should recognise the social imperatives of the communities in which they operate. We support the release of staff to work upon community activities.

7. Compliance

Our suppliers must comply with all applicable laws and regulations, both in letter and in spirit, in all the countries in which they operate.

Supplier Approval and Signature

I confirm that the compliance statements in this document are a fair and true representation of the way in which the supplier named below operates.

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<th>Name (Please Print) :</th>
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<tr>
<td>Legal Entity name of Supplier</td>
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