



# Group Supplier Code of Conduct



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**L&G's purpose is 'Investing in the long term. Our futures depend on it.' This means we strive to improve the lives of our customers, build a better society for the long term and create value for our shareholders. In doing so, we seek to build a better future and a more sustainable world.**

Our role in the economy goes straight to the heart of our purpose. It manifests in the ways we do business: the investments we make, the ways in which we seek to influence other actors in the economy and how we operate. We invest pensioners' money, insurance premiums and our clients' wealth in useful ways, matching capital with investment opportunities and creating assets with long-term value.

We drive to embed a culture of integrity which is why we take our responsibility as an employer and as a participant in labour markets through our value chain, extremely seriously. We insist on very high standards of business and personal integrity from our people, our suppliers and those doing business with us. This is because we believe that we can only deliver on our ambitions if we have the right foundations for success in place. That includes a commitment to observing the spirit and letter of law and regulation, as well as creating an inclusive environment in which everyone can succeed and use their diversity of thought and experience to help them solve some of the biggest issues facing society.

## Our approach to the supply chain

At L&G, we have a robust procurement framework to engage with our supply chain effectively and fairly in a manner that manages risk and promotes value in the best interests of our customers, employees, regulators, and shareholders.

As part of that framework, our contracts set out the commercial and legal parameters of our engagements with our suppliers including compliance with laws and regulations and provisions to ensure continuity of services and the security of data.

Our procurement spend spans all categories across the group from services including HR, professional services, group real estate, marketing, and goods such as stationery and corporate items to IT systems and desktop hardware and software.

Our spend generates a positive economic impact in the marketplace and supports the development and growth of other companies within the supply chain. L&G aims to build a collaborative supplier ecosystem driven by value-adding partnerships with suppliers that support innovative solutions.

## Purpose of this document

Aimed at our supplier community, this Code of Conduct is a set of guiding principles underpinning our ambition and direction of travel across several important areas. It is our aim to have all our suppliers agree to the principles in the Code of Conduct and work together with us with intent to drive positive social change.



## How we will assess compliance

We will assess your compliance through online questionnaires, issued by L&G directly or via a designated assessment provider, as part of our onboarding due diligence process, and again at suitable regular intervals in line with our policies. This will include seeking confirmation that you have read and understand this code, and that you will work with us to develop a sustainable supply chain.

Your confirmation and question responses will be evaluated and form part of tender evaluations and contract renewals. We will use aggregated data on responses as part of our annual reporting on key aspects of social impact in our annual reports and would encourage suppliers to do the same, wherever feasible.

## Code of conduct focus areas

- Business conduct
- Inclusion and Wellbeing
- Human rights & modern slavery
- Environmental management
- Digital accessibility
- Prompt payment
- Real living wage
- Social value

## Business conduct

### What we do

Supplier selection and due diligence – we operate a robust supplier management framework which includes undertaking rigorous due diligence when onboarding new suppliers and through the term of the contracts.

We have a group Speak Up (whistleblowing) policy in place and concerns may be raised by email: [speakup@landg.com](mailto:speakup@landg.com)

We operate a Group-wide Financial Crime risk management framework to provide oversight of the management of controls to identify and manage the risk that L&G and its customers might be subject to or used to facilitate financial crime.

The Group and all wholly or majority owned subsidiaries, are committed to maintaining compliance with all legal and regulatory requirements in relation to financial crimes, which include sanctions, money laundering, financing of terrorism, proliferation of weapons of mass destruction, market abuse, facilitation of tax evasion, bribery & corruption, and fraud.

We have policies in place to ensure that L&G will:

- perform appropriate risk-based due diligence, screening and monitoring of all customers, suppliers, and other relevant parties to ensure that financial crime risks can be identified and managed
- monitor for and investigate any suspicious activity and fraud and will liaise with law enforcement authorities and/or regulators as appropriate
- assure and test the effectiveness of its controls in place to detect and prevent financial crime

### What we ask of our supply chain

Suppliers will:

- adhere to the L&G due diligence process and answer questions honestly, completely and in a timely manner
- take reasonable steps to resolve any issues or risks identified in through the process
- undertake an appropriate level of due diligence on your own suppliers to ensure continuity of service and security of data
- have, or take steps to put in place, a whistleblowing policy.
- keep up to date with legal and regulatory developments

Suppliers will ensure appropriate processes and procedures are in place that prevent financial crime risk to L&G through the course of the relationship. This includes having appropriate systems and controls to manage risks arising from sanctions, money laundering, financing of terrorism, proliferation of weapons of mass destruction, market abuse, facilitation of tax evasion, bribery & corruption, and fraud.

In addition to maintaining effective policies and procedures for the management of financial crime risk, suppliers will:

- comply with any reasonable requests made by us to provide documents, information, or material to support L&G identify and manage any fraud risks and comply with legislative and regulatory requirements
- provide any relevant transaction or other records, relevant to the relationship upon reasonable request
- ensure any disbursements made through the supply chain are done so legitimately and in accordance with laws of any jurisdiction involved. Ensure no payments are made or flow to sanctioned individuals or facilitate criminal activity in any way



- training of all L&G colleagues and persons acting on our behalf on how to prevent and detect financial crime and the risk management programmes in place at L&G.
- notify L&G immediately where it has identified a material risk of breaching financial crime legislation or regulatory requirements, relevant to the relationship
- notify L&G immediately of any reports to law enforcement or other authorities, as relevant to the relationship.

Our tax strategy, which is published annually on our website, sets out our attitude to our tax affairs and how we conduct ourselves. Paying and collecting the right taxes at the right time is part of our overall approach.

We aim to be:

- sustainable in the long term – our group's tax rate depends on our business performance and not artificial tax planning
- well governed – we manage tax risk like any other risk in our business and invest in our people
- fair – we recognise the impact tax has on wider society and undertake to act responsibly in all tax matters
- transparent – we seek to explain the taxation of our business to all our stakeholders.

Suppliers will meet all legal obligations in respect of taxation, in the UK and globally, making all appropriate tax returns and tax payments accurately and on time.

## Inclusion and Wellbeing

### What we do

Our vision is to build a workplace where we can all perform at our best, no matter who we are. Creating more diverse workforces and more inclusive workplaces is highly important to us: both as an investor and asset manager, and as an employer focussed on the inclusion and wellbeing of all our people.

Having a more diverse workforce and a more inclusive workplace is a potential source of commercial advantage for us. It's also the right thing to do.

Our strategy to deliver these focuses on:

### What we ask of our supply chain

Suppliers will protect their employees from discrimination on the grounds of age, disability, gender reassignment, gender identity, marriage and civil partnership, pregnancy, race, religion or belief, sex, or sexual orientation in line with relevant legislation.

Suppliers will fulfil all mandatory gender pay gap reporting requirements and we encourage suppliers to make voluntary disclosure of their ethnicity pay gap.

We encourage suppliers to have a clear D&I policy for their people, and their own suppliers and to



- recruitment and retention, to ensure we have a diverse mix of people in our workforce
- leadership and people management capability development, to ensure our people leaders have the practical skills to shape inclusive cultures, and
- creation of equitable opportunities for development and progression, available to everyone.

We are committed to fostering a respectful and inclusive workplace where everyone is valued and treated with dignity and respect.

We strive to maintain a working environment free from bullying, harassment, sexual harassment, victimisation and stalking. We have a zero-tolerance approach to this unwanted conduct whether it takes place in or outside of work, in person or online (including via email or social media).

Our employees are expected to follow a Dignity at Work Policy and a Diversity and Inclusion Policy. We expect those who work with us in any capacity to uphold the same standards that apply to our employees.

We report publicly on our ambitions and several key metrics, including gender and ethnicity pay gaps, in our annual Social Impact Report.

demonstrate the company's commitment to diversity and inclusion by transparently publishing an evidence-based D&I strategy that includes:

- the firm's D&I objectives and goals
- the plan to meet these goals
- measures used to track progress
- ways to ensure adequate knowledge of the inclusion strategy amongst staff so that they can engage with it, help improve it, and manage any obstacles.

We encourage suppliers to work with diverse businesses and enact inclusive sourcing in their own organisations.

Suppliers must try to prevent bullying and discrimination happening now and in the future.

For example, we encourage suppliers to:

- train line managers on a specific issue, for example bias mitigation.
- train all staff on what to do if they experience or witness unacceptable behaviour
- determine a policy on bullying and harassment
- make it clear to employees what support is available if they experience or see unacceptable behaviour at work.

Finally, to work with L&G to improve awareness of diversity and inclusion issues among staff and wider society.



## Human rights & modern slavery

### What we do

We understand our responsibility to prevent, mitigate and remediate the risks of human trafficking, and forced, bonded and child labour where appropriate; and to respect human rights in our operations and our supply chain.

Our approach to preventing modern slavery continues to be aligned with the United Nations Guiding Principles on Business and Human Rights. We fully support the principles of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and we have been a signatory and supporter of the UN Global Compact since 2012.

Our commitment to human rights can be found in our human rights policy on our policies page on our corporate website: Our policies - group wide policies | L&G ([legalandgeneral.com](https://legalandgeneral.com))

We believe in collaboration and seek to proactively work with our suppliers and supply chain to prevent and mitigate against modern slavery and breaches of human rights in our supply chain. This might include, but is not limited to, agreeing to unannounced visits or audits taking place on sites of suppliers.

### What we ask of our supply chain

We expect suppliers not to participate, facilitate, enable, or benefit directly or indirectly in human rights violations and abuses in their own operations, supply chain, use or design of products/services, and/or customers.

Suppliers will adopt and disclose a commitment to human rights covering their operations and value chains, adhering to applicable voluntary or mandatory human rights frameworks.

Suppliers will publish their Modern Slavery Statement if in scope of the Modern Slavery Act 2015 and work with L&G to improve awareness of modern slavery and human rights among staff and improve processes to identify breaches of human rights.

Suppliers will work with L&G to remediate any situation where a breach of modern slavery is suspected. Where remedy is not possible, such as in the case of state-imposed forced labour, L&G will commit to a responsible exit strategy from the supplier.



## Environmental management

### What we do

At L&G we recognise that the way in which we operate our businesses has the potential to create both environmental impacts and opportunities.

To help ensure that we continue to drive environmental improvements through our operations and to support our long-term approach to managing climate and nature risks, we have a suite of environmental targets and commitments.

Managing the risks and opportunities from climate change and nature loss are a core component of our strategic priorities and we have set targets to manage our emissions. All our targets are published in our Climate & Nature report.

We are committed to protecting the natural resources we use through the implementation of sustainable procurement principles throughout our supply chain and recognise that the purchasing of goods and services is a large contributor to our scope 3 carbon emissions.

We want to ensure that we are working with suppliers who share our net zero ambition and are already taking strides to manage their carbon footprint and wider environmental impacts.

### What we ask of our supply chain

Suppliers will share their approach to managing all environmental risks, from regulatory requirements to managing the risks of climate change.

Suppliers will provide details of the carbon emissions associated with the products and services provided to L&G. We recognise that not all suppliers will have this information readily available and would welcome the opportunity to work with suppliers to help capture and report this important data.

We expect that larger suppliers have science-based carbon reduction targets and net zero targets. We define a target as science-based if it is aligned to SBTi criteria i.e., is a mid-term reduction target with enough ambition to align with the global net zero trajectory. We would expect this to be between 40-50% reduction depending on the base year.

For small and medium enterprise sized suppliers we expect to see evidence of efforts to reduce carbon emissions. We are happy to offer you support in setting science-based carbon reduction and net zero targets in the future.



## Digital accessibility

### What we do

We aim to build and test our applications to “AA” conformance standards in the latest WCAG (Web Content Accessibility Guidelines) and update our internal standard when any new success criteria are added to WCAG.

We take a people-first approach to inclusive design, ensuring we consider accessibility when defining features – it is not an afterthought.

We promote the use of our open-source design system, Canopy, to maintain high standards of accessibility. We also shift accessibility left wherever possible by adding aria labels and alt text.

Accessibility is part of our quality strategy and our Definition of Done, using automated and manual testing for keyboard access/interaction and content.

Our content teams keep our language clear and simple, to make our services understandable to all users. We work with third-party specialists to test our communications, and to monitor our accessibility status through regular third party tests. We have introduced a “Tell us once” preference centre via The Accessibility Hub.

We’re offering accessibility training to employees through a third-party provider and nationally recognised qualification.

### What we ask of our supply chain

Suppliers will follow the L&G Accessibility Guidelines, with all solutions aligned to the latest standards in the WCAG. Suppliers should voluntarily disclose their accessibility compliance, preferably using a VPAT (Voluntary Product Accessibility Template).

Suppliers will follow inclusive design approaches, ensuring accessibility is considered when defining features, whether L&G includes it as a specific requirement, or not and support users with any specific accessibility training needed to access your software / applications / products.

Suppliers will consider using our open-source design system, Canopy, to maintain high standards of accessibility, when developing bespoke interfaces for L&G.

Suppliers will conduct regular accessibility testing, providing evidence as required and fix any accessibility issues identified in specified time. If accessible versions cannot be applied or created, this should be communicated and justified proactively.

Suppliers will have a contact email address for accessibility issues.



## Social value

### What we do

At L&G our aim is to recognise the importance of contributing to the wellbeing of society and fostering positive social impact.

Some examples are as follows:

- apprenticeship programmes - enable L&G to build a diverse talent pipeline aligned to our strategic workforce needs. Currently we have over 40 apprentices across our offices in London, Cardiff and Hove spanning data, technology, accounting, financial crime, customer service, project management and business analysis
- we engage in long-term partnerships with civil society organisations aligned to L&G's purpose. Through financial support, engaging our people in volunteer initiatives and leveraging their skills to offer pro bono support, we help to solve social challenges.
- utilising Mental Health First aiders, our Employee Assistance Program (EAP) and mental health provision through our medical insurance provider.

Ethical marketing and communication: We seek to ensure that all our marketing and communication practices are ethical, and avoid misleading advertising, respecting consumer privacy, and ensuring that their marketing efforts align with socially responsible principles.

Measurement and reporting: Transparent reporting allows us to collectively track progress, identify areas for improvement, and celebrate successes in our shared commitment to social value creation.

### What we ask of our supply chain

As part of our commitment to corporate social responsibility, we expect our suppliers to share and uphold these values.

We encourage suppliers to actively engage with the communities in which they operate. This could involve supporting local initiatives, contributing to community development projects, or participating in philanthropic efforts that align with community needs.

We value suppliers who actively contribute to social responsibility programmes, whether through charitable donations, volunteer initiatives, or partnerships with non-profit organisations. Suppliers are encouraged to engage in activities that positively impact society and the communities in which we live and work.

Suppliers are expected to engage in ethical marketing and communication practices.

We encourage suppliers to measure and report on their social impact initiatives regularly.

By aligning with our expectations on social value, we expect our suppliers to contribute to a shared commitment to building a more sustainable and socially responsible business ecosystem.



## Prompt payment

### What we do

The prompt payment of invoices means a more stable and sustainable economic environment which in turn enhances the resilience of the services our organisation provides.

L&G is a signatory of the Prompt Payment Code. While the code has a requirement to pay 95% of invoices within 60 days, L&G's standard payment policy is within 30 days of receipt of a valid invoice associated with a valid Purchase Order.

### What we ask of our supply chain

We ask that suppliers sign up to the Prompt Payment Code or take positive steps to align to the ethos and ambitions of it by treating their suppliers fairly and paying invoices on time and within terms.

## Real living wage

### What we do

L&G Asset Management are members of the Platform for Living Wage Financials (PLWF), a group of 21 financial institutions who are assessing investee companies in certain key sectors to ensure workers in their supply chain, as well as within their organisations, are being paid a living wage.

We are also a Real Living Wage and Real Living Pension Employer (and a member of the Living Wage Foundation), as such we are committed to paying our people, and those regularly contracted to us, a fair and respectable wage. This includes checks on our facilities management suppliers and increasing rates as required to ensure they meet current standards.

### What we ask of our supply chain

We ask that suppliers take steps to commit to the Living Wage Foundation and ensure the Real Living Wage is paid wherever feasible.

Suppliers with employees regularly working on our sites must pay the Real Living Wage to those employees.

We invite our suppliers to consider becoming Real Living Pension employers themselves.