



Introduction

Page 03

Complying with this code

Page 04

Acting with integrity

Page 05

Working with others

Page 06

Speak Up

Page 08

Useful information

Page 08

Introduction



Martin Gilbert and Keith Skeoch
Co-Chief Executives

Standard Life Aberdeen plc is one of the world's largest investment companies. We are committed to ensuring we operate responsibly, and to encouraging good practices amongst the external businesses we engage with.

We have responsibilities to many different stakeholders – our colleagues, our customers and clients, and those who we impact through our investments, supply chains and business partners. We take all of these responsibilities very seriously.

We set out strict standards of corporate behaviour for all of our people to follow. This includes complying with all applicable laws and regulations, protecting human rights, providing a safe place of work and minimising our direct and indirect environmental impact.

We also expect our suppliers to adhere to high standards in the way that they operate. This document sets out the standards and principles we require them to follow, and that we expect them to demand from their own supply chains.

We aim to build effective and supportive relationships with our suppliers. We believe in paying a fair price for the products and services we consume, and quality is always a priority. By working with suppliers that share our values we can establish relationships that are mutually beneficial.

Complying with this code

This Supplier Code of Conduct ("Code of Conduct") applies to all Suppliers and their affiliates and subcontractors ('Suppliers'), which provide goods or services to Standard Life Aberdeen plc and / or any of its subsidiaries ('Standard Life Aberdeen'). The terms of this Code of Conduct are in addition to any other commercial or contractual terms or obligations agreed.

Standard Life Aberdeen recognises that there are different legal and cultural environments in which Suppliers operate. This Code of Conduct outlines the minimum conduct standards to which Suppliers must adhere when doing business with Standard Life Aberdeen.

Suppliers must be able to demonstrate adherence to this Code of Conduct if requested by Standard Life Aberdeen, and failure to demonstrate compliance will lead to a review of the supplier contract.

Any questions have regarding this Code of Conduct should be directed to your Standard Life Aberdeen contact.

Acting with integrity

Regulations and legislation

Suppliers must:

- Comply with all laws applicable to their business in the countries in which they operate and to seek similar commitments across their own supply chains.

We will seek to include appropriate legal obligations in any legal agreement we enter into with suppliers in order to meet this commitment and our legal and regulatory obligations.

Using information responsibly

You have a duty and a commitment to protect the information you process on our behalf for the service(s) agreed, including information about Standard Life Aberdeen employees, customers and clients, as well as corporate information, and any information deemed to be Standard Life Aberdeen's Intellectual Property. Some of this information may be sensitive and/or confidential and we expect our suppliers to understand and follow data protection and privacy laws when working with us.

Suppliers must:

- Ensure that appropriate technical and organisational measures are in place to safeguard Standard Life Aberdeen information, in particular any personal information as defined by data protection law (including special category personal data) or confidential information in relation to Standard Life Aberdeen's business, to prevent unauthorised access, accidental loss or destruction of this data
- Not transfer any Standard Life Aberdeen personal information outside of the European Economic Area without our prior consent, as will be defined in the contractual agreement between us for the provision of this service.
- Immediately, or within 24 hours of becoming aware, inform their Standard Life Aberdeen contact if there is any potential or actual breach of our information.

Conflicts of interest

Suppliers must:

- Have procedures in place to identify actual and potential conflicts with Standard Life Aberdeen or our customers and clients.
- Disclose to us any actual or potential conflicts of interest so that they can be dealt with appropriately.

A conflict of interest is any situation where the interests of a company, or of its people, are in competition with those of a customer or client leading to a risk that a customer or client may be adversely affected. Conflicts of interest can also happen when an employee's own interests interfere or conflict with their loyalty to their employer.

Anti-competitive behaviour

Suppliers must:

- Avoid practices that may be viewed as anti-competitive, for example sharing confidential or commercially sensitive information with our competitors or other suppliers to Standard Life Aberdeen.

Bribery and corruption

Suppliers must:

- Have a zero-tolerance approach to bribery and corruption in any form. At minimum, we expect Suppliers to comply with the Foreign Corrupt Practices Act, the Bribery Act 2010 and all applicable laws, regulations and industry standards in the countries in which they operate.
- Immediately report any concerns in relation to bribery and corruption to their Standard Life Aberdeen contact, or through their own company's whistle-blowing hotline or if this is not available then confidentially through Standard Life Aberdeen's Speak Up service (see page 08).

Tax Evasion

Tax evasion is the act of intentionally underpaying tax. This is a criminal offence and can be committed at an individual or corporate level. It is also an offence to facilitate another party's actions in evading tax.

Suppliers must:

- Have a zero tolerance approach to tax evasion in any form. At a minimum we expect suppliers to comply with the Criminal Finances Act 2017 and all applicable laws, regulations and industry standards in the countries in which they operate.
- Immediately report any concerns in relation to tax evasion to their Standard Life Aberdeen contact, or through their own company's whistle-blowing hotline or if this is not available then confidentially through Standard Life Aberdeen's Speak Up service (see page 08).

Gifts and entertainment

Suppliers must:

- Respect that Standard Life Aberdeen employees must not give or receive excessive or inappropriate entertainment and may only offer or accept gifts of modest value.
- Have appropriate controls in place so that the gifts and entertainment they provide are not bribes or perceived to be bribes.

All gifts or entertainment given or received are recorded in a register by Standard Life Aberdeen employees. We exercise care when offering or accepting gifts or entertainment from any third party. These should never create a feeling of obligation or be perceived as an attempt to influence or bribe the recipient.

Working with others

How we treat each other reflects on us individually and as a business. We are committed to create an open, safe and supportive working environment and expect all our employees and suppliers to behave professionally. In all our communication with each other we must always consider what we say, how we say it and who we say it to.

Our customers and clients

Suppliers must:

- Accept and respect that the needs of our customers and clients are varied and will change throughout their relationship with us.

Fair treatment of our customers and clients is at the heart of our culture. We are committed to building valuable long-term relationships to protect and grow assets. We know that there are times when they could be vulnerable; and we respond accordingly. We expect suppliers who work directly with our customers and clients to respect and adhere to this principle too.

Human Rights and Labour Standards

Suppliers must:

- Respect the human rights of their employees and comply with all relevant legislation, regulations and directives in the countries and communities in which they operate.
- Pay the UK Living Wage as a minimum to any employees providing goods or services who physically work within our UK premises.
- Uphold as a minimum, commitments relating to the four core International Labour Organisation (ILO) standards shown below and ensure that their own supply chain also meets these minimum standards:



Freedom of association and the effective recognition of the right to collective bargaining

Suppliers must not interfere with the right of employees to legally organise and join associations such as labour unions, employee consultation committees or employee associations.



The elimination of all forms of bonded labour and compulsory labour including modern slavery

Suppliers must prohibit the use of forced labour or bonded labour and give their employees, whether local or migrant, the right and the ability to leave employment when they choose.

Suppliers must meet their obligations in accordance to the UK Modern Slavery Act 2015 and take steps to address modern slavery in all their operations and supply chains by ensuring that any contracts with subcontractors have similar obligations



The effective abolition of child labour

Suppliers must ensure that child labour is not used and that the employment of young workers adheres to local regulations.



The elimination of discrimination with respect to employment and occupation

Suppliers should provide a work environment in which employees do not suffer from harassment, verbal, visual, physical abuse or any conduct that creates an intimidating, offensive or hostile workplace. It is the responsibility of our suppliers to ensure they only employ people with a legal right to work in that geography and that their employees are 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.

Diversity and inclusion

Suppliers must:

- Abide by all relevant equality legislation in the countries in which they operate.
- Promote a workplace which does not tolerate harassment, bullying, intimidation or offensive behaviour in any form.
- Seek leadership in their approach to diversity and inclusion, and appreciate we are not all the same, and that differences should be valued, respected and embraced.

We are committed to building a diverse supply base and will encourage opportunities for diverse businesses (at least 51% minority owned) and SMEs (less than 250 employees and turnover of less than 50M EUR or a balance sheet of less than 43M EUR) to engage with Standard Life Aberdeen for the supply of goods and services.

Community and sponsorship

Suppliers must:

- Be aware of the impact they have on their communities and take steps to influence positive change. We encourage our suppliers to:
 - Look for ways to invest in charitable causes and social enterprises in the communities in which they operate
 - Actively support their employees to volunteer in their communities.

Our environment

Suppliers must:

- Comply with all applicable environmental legislation and regulations, including the handling of dangerous and hazardous materials.
- Have a written environmental policy or statement (appropriate to the size and nature of the supplier's operations), which addresses (as a minimum) CO2e emissions, waste (including recycling) and resource use
- Have an effective internal environmental management system or programme, led by an appropriately trained person that provides information about key environmental indicators.

We are committed to reducing the environmental impact of our business operations through minimising energy and resource use and associated emissions across our operations, and by working with suppliers who do the same.

Health and safety

Suppliers must:

- Provide a safe and healthy work environment. When contracting on our sites Suppliers must comply with our Health, Safety and Well-being Policy Statement.

We are committed to improve not just our own health and safety performance, but also that of our suppliers and of others who undertake work on our behalf.



**Read and download our current reports
and policies from our document library**



Speak Up hotline

If you have any concerns about actions or decisions made that go against the principles and standards set out in this Code of Conduct then please inform your contact at Standard Life Aberdeen.

If for any reason you feel unable to raise your concern with your Standard Life Aberdeen contact or you wish to remain anonymous, then you can use our confidential Speak Up service. All concerns raised are taken seriously and the identity of anyone raising a concern will be kept confidential.


Our Speak Up service is managed by Safecall, who are independent from Standard Life Aberdeen and who are recognised as a leading global authority on all aspects of whistleblowing.



www.safecall.co.uk/report



standardlifeaberdeen@safecall.co.uk



Please refer to the following list of local free phone numbers. Calls are not recorded. All calls are free, confidential and available 24/7.

Uk & Europe

Country	Telephone	Country	Telephone
Austria	00800 72332255	Belgium	00800 72332255
Denmark	00800 72332255	Finland	Telia Sonera: 990 800 72332255 Elisa: 990 800 72332255
France	00800 72332255	Germany	00800 72332255
Hungary	00800 72332255	Ireland	1800 812 740
Italy	00800 72332255	Jersey	0800 915 1571
Luxembourg	00800 72332255	Netherlands	00800 72332255
Norway	00800 72332255	Spain	00800 72332255
Sweden	0850 252122	Switzerland	00800 72332255
UK	0800 915 1571		

Americas

Brazil	0800 892 1750	Canada	1 877 599 8073
USA	1 866 901 3295	Columbia	01800 9448040

Asia Pacific

Australia	0011 800 72332255	China	Unicom 10800 7440605 Telecom 10800 4400682
Hong Kong	3077 5524	India	000800 440 1256
Indonesia	00180 344 0884	Japan	0120 921067
Malaysia	1800 220 054	Singapore	800 448 1773
South Korea	Korea telecom: 001 800 72332255 DACOM: 002 800 72332255	Taiwan	00800 72332255
Thailand	CAT: 001 800 72332255 Other networks: 00800 72332255	United Arab Emirates (Abu Dhabi)	8000 4413376



Standard Life Aberdeen plc is registered in Scotland (SC286832) at 1 George Street, Edinburgh EH2 2LL.
www.standardlifeaberdeens.com

MUL778 0718 © 2018 Standard Life Aberdeen, images reproduced under licence
SG-210720-121646-1