

Global Third Party Code of Conduct

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Doing the right thing

We place client and customer needs at the centre of everything we do to achieve our purpose – enabling our clients to be better investors.

Building effective and supportive relationships with business partners, and through our supply chains, influences our ability to react to those needs.

Through capabilities such as data, digital and technology, we aim not only to make it easy for clients and customers to get things done today, but also to deliver solutions that they will need tomorrow. Our relationships with third parties also influence our ability to shape a modern workplace in which our colleagues can perform effectively, and to make a positive difference to the environment and communities around us.

This document sets out the principles we require all third parties to follow when they do business with us – and that we expect them to demand from their own supply chains. 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 expect our third parties to adhere to the same high standards, behaviours and cultural commitments that we ask of our colleagues. We prioritise quality, acting responsibly, and we believe in paying a fair price for the products and services we consume. By working with organisations that reflect a belief in our purpose through the way they operate, we can establish relationships that are mutually beneficial.



Stephen Bird

Chief Executive Officer

Complying with this Code

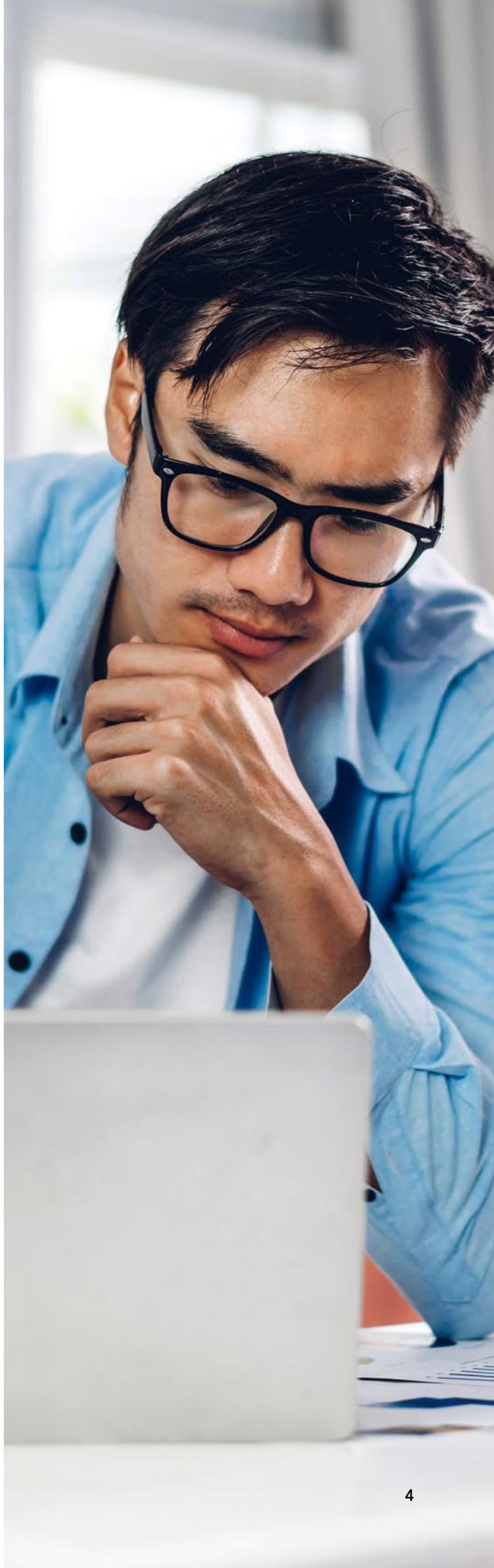
Our Global Third Party Code of Conduct ('Code') applies to all third parties and their affiliates and subcontractors ('third parties'), which provide goods or services to abrpn plc and / or any of its subsidiaries ('abrpn'). The terms of this Code are in addition to any other commercial or contractual terms or obligations agreed.

abrpn recognises that there are different legal and cultural environments in which third parties operate. This Code outlines the minimum conduct standards that we expect third parties to follow when doing business with us, and we expect third parties to be able to demonstrate that they are adhering to this Code if we request this.

We acknowledge that no code can address every situation that third parties may encounter. As a result, the Code is not a substitute for third parties' own accountability and responsibility to exercise good judgment and proper business conduct. We encourage third parties to seek additional guidance and support from those within our business designated as responsible for the goods or services they are providing.

We take adherence to this Code seriously, however we recognise that some smaller businesses in particular may have concerns about meeting all or part of it. We are open to discussions with those businesses and would encourage them to engage with us.

We encourage you to report transparently on all the elements included in the Code in your external publications.



Our Cultural Commitments

Our Commitments

Our commitments are a set of statements designed to guide our colleagues' actions and reflect what it feels like to work at abrdn and set out our cultural aspirations. These commitments shape our behaviours and culture, where colleagues are empowered to speak up, and promote the transparency which underpins our conduct across abrdn.



We put the client first

From every seat in our business, we understand our unique role in enabling our clients to be better investors, regardless of where we fit in the organisation.



We are empowered

We speak up, challenge and act. We take ownership for our work, we accept accountability for our successes and, when they happen, our failures too.



We are ambitious

We strive for exceptional performance. We also know when to balance pace with perfection to get things done. We are passionate about the positive impact we can have on our business.



We are transparent

We have the honest and important conversations that fuel our performance and build trusted relationships.

Acting with integrity

We all have a basic responsibility to comply with relevant laws, regulations and policies. Acting with integrity is a higher standard. It requires us all to think about every action we take – before we take it – to ensure we are acting in the best interests of our stakeholders.

Regulations and legislation

We expect you to comply with all laws applicable to your business in the countries in which you operate, and to seek similar commitments across your own supply chains.

In any legal agreement we enter into with a third party, we will seek to include appropriate legal obligations in order to meet this commitment.

Using information responsibly

It's your responsibility to protect the information you process on our behalf for the service(s) agreed – including information about abrDN employees, clients and customers, as well as corporate information, and any information deemed to be abrDN's intellectual property. Some of this information may be restricted and/or confidential.

When working with us, we expect you to:

- understand and follow data protection and privacy laws.
- ensure that appropriate technical and organisational measures are in place to safeguard abrDN's information – in particular, any personal information as defined by data protection law (including special category personal data) or confidential information in relation to abrDN's business – to prevent unauthorised access, accidental loss or destruction of this data.
- avoid transferring any abrDN personal information outside of the European Economic Area without our prior consent – which we will define in the contractual agreement for the provision of the service you provide.
- immediately, or within 24 hours of becoming aware, inform your abrDN contact if there is any potential or actual breach of our information.

Social media

Act responsibly whenever you are using social media platforms. Engaging in disrespectful, unprofessional, harassing, defamatory, discriminatory or prohibited activity can damage your reputation and the relationship you have with our business.

We don't permit third parties to speak on our behalf on social media, or to represent themselves as our business. Unless we authorise you to do so, you should also avoid representing any views, communications or messaging developed by our business as your own.

Conflicts of interest

A conflict of interest is any situation where the interests of a company, or of its people, are in competition with those of a client or customer, and which leads to a risk that a client or customer 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.

We expect you to:

- have procedures in place to identify actual and potential conflicts you might have with abrDN or our clients and customers.
- disclose to us any actual or potential conflicts of interest so that they can be dealt with appropriately.

Anti-competitive behaviour

Avoid practices that may be viewed as anti-competitive – for example, sharing confidential or commercially sensitive information with our competitors or other third parties to abrDN.

Bribery and corruption

Third parties must take a zero tolerance approach to bribery and corruption in any form. At a minimum, this means complying 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.

If you have any concerns in relation to bribery and corruption, you should report these to your abrdn contact immediately, or through your own company's whistleblowing hotline. You can also raise concerns confidentially through abrdn's Speak Up service (see page 11).

Financial sanctions and export controls

It's vital that you comply at all times with all relevant financial sanctions programmes and export control regimes, across all the countries in which you operate – and avoid doing anything that might put our business at risk of breaching these.

Tax evasion

Tax evasion is the act of intentionally underpaying tax or diverting funds from public revenues. 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.

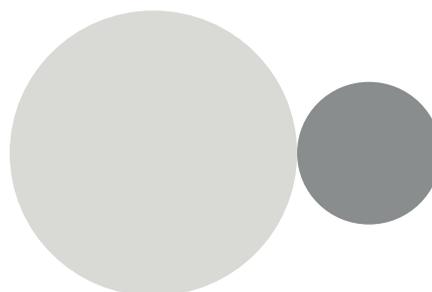
This means that we require you to:

- take a zero tolerance approach to tax evasion in any form – and, at a minimum, comply with the Criminal Finances Act 2017 and all applicable laws, regulations and industry standards in the countries in which you operate.
- immediately report any concerns to your abrdn contact, through their own company's whistleblowing hotline, or through our Speak Up service.

Gifts and entertainment

You should have appropriate controls in place so that any gifts and entertainment you provide are not bribes or perceived to be bribes.

We exercise care when offering or accepting gifts or entertainment from any third party. We don't allow our employees to give or receive entertainment or gifts that are excessive or inappropriate in value. They can only offer or accept gifts of modest value, and are required to record these in our gifts and entertainment register.







How we treat each other reflects on us individually and as a business. We are committed to creating an open, safe and supportive working environment and expect all our employees and third parties to behave professionally.

Our clients and customers

It's important to understand that the needs of our clients and customers are varied, and will change throughout their relationship with us – and to reflect this understanding in the way that you operate.

Fair treatment of our clients and customers 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 third parties who work directly with our clients and customers to respect and adhere to this principle too.

Responsible Business Practices

Our vision for a better future starts with asking more of ourselves. Every day we look for ways to go further for our clients, to be a better and more inclusive employer, to strengthen our governance and to reduce our environmental and social impact.

Upholding Labour and Human Rights

We take our responsibility seriously to uphold labour and human rights for all our employees and contracted staff. We ensure our staff are paid a fair and equitable wage and given stable contracted hours. Our commitment to this is demonstrated by our Living Wage and the Living Hours UK certification.

We expect you to:

- respect the human rights of your employees and comply with all legislation, regulations and directives applicable to your organisation, including the UK 2015 Modern Slavery Act where businesses are captured by the legislation.
- we discourage/prohibit the practice of worker recruitment fees and support the 'employer pays' principle, that no worker should have to pay for a job.

- only employ people with a legal right to work in the country they work from.
- provide your employees with a fair and equitable wage – if the places you provide services to abroad have living wage accreditation or legislation, we expect you to adhere to this. Otherwise, as a minimum we expect you to provide a fair and equitable wage to your employee base.
- ensure a right to a contract that reflects accurate hours worked and provides decent notice periods for shifts.

We expect third parties to take a zero tolerance approach to modern slavery, upholding the commitments relating to the four core International Labour Organisation (ILO) standards highlighted below, and ensure that your own supply chain also meets these minimum standards:

- freedom of association and the effective recognition of the right to collective bargaining.
- the elimination of all forms of bonded labour and compulsory labour including modern slavery.
- the effective abolition of child labour.
- the elimination of discrimination with respect to employment and occupation, including migrant/temporary labour.

Lastly, we expect you to ensure that your affiliates and subcontractors meet these standards and that they work on a similar basis with their third parties.

Enabling Diversity, Equity, and Inclusion

Diversity in all forms, paired with a culture of inclusion, is at the core of our business. It helps us address society's concerns and helps our colleagues feel valued for who they are. It's also vital when working with clients and customers who face increasingly complex challenges. Inclusive procurement is an important part of this.

We expect you to:

- comply with all relevant equality legislation in the countries in which you operate.
- protect employees 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.
- provide a workplace which does not tolerate harassment, bullying, intimidation or offensive behaviour in any form.

- have a considered and relevant approach which values and respects diversity, equity and inclusion.

We are committed to building a diverse supply base. We encourage opportunities for diverse businesses (at least 51% minority owned) and SMEs (less than 250 employees and turnover of less than £50m or a balance sheet of less than £43m) to engage with abrdn for the supply of goods and services. We encourage you to do the same with your supply base.

Supporting communities

At abrdn we recognise the important impact corporate sponsorship and volunteering has on the local communities we support, enabling them to make positive changes to their local environment.

We encourage you to:

- look for ways to invest in charitable causes and social enterprises in the communities in which you operate.
- actively support employees to volunteer in their communities.

Protecting our environment

We are committed to minimising the impact of our business operations on the environment. We aim to achieve this by reducing our energy and resource consumption and making responsible procurement decisions. The goods or services procured from third parties contributes to our indirect environmental impact through the emissions associated with their business activities, and in some instances their consumption of nature derived products. Therefore, we recognise that you have a significant role to play in helping us to reduce our impact.

We expect you to:

- comply with all environmental legislation and regulations applicable to your organisations.
- maintain a written environmental policy and effective internal environmental management system or framework.
- have in place emission reduction targets and effective emission monitoring covering emission scopes 1, 2, & 3, and be willing to share this information on request.
- (where applicable to business activities) have established controls to ensure nature derived products are sustainably sourced.

In addition to the above we encourage you to embed circular economy principles where possible to reduce waste derived from your operations and reduce raw material extraction demands.

Health and safety

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

We expect you to provide a safe and healthy work environment, both on your own premises and when contracting on our sites.

Better Environmental, Social, and Governance (ESG) transparency

As part of abrdn's commitment to understanding the sustainability risk associated with third party activities and working with our partners to reduce their impact we have partnered with EcoVadis – a leading third party sustainability rating platform.

We expect third parties to undertake audit or implement adequate proxy audit beyond tier 1 of their own supply chains and we encourage you to join EcoVadis, if you are not already registered, to assist us with our ESG aspirations.

Read and download related reports and policies on the [abrdn.com](https://www.abrdn.com) website



Raising your concerns

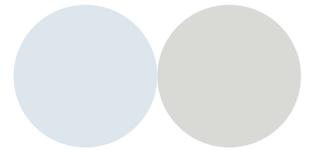
If you have any concerns about actions or decisions made that go against the principles and standards set out in this Code then please inform your contact at abr dn.

If for any reason you feel unable to raise your concern with your abr dn 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 abr dn and recognised as a leading global authority on all aspects of whistleblowing.

Contact Speak Up via the dedicated website www.safecall.co.uk/report

Get in touch



Local freephone numbers

Calls are not recorded.

All calls are free, confidential and available 24/7.

UK & EMEA

Country	Telephone
Austria	00800 72332255
Belgium	00800 72332255
Denmark	00800 72332255
Finland	Telia Sonera 990 800 72332255
	Elisa 990 800 72332255
France	00800 72332255
Ireland	1800 812 740
Germany	00800 72332255
Jersey	0800 915 1571
Italy	00800 72332255
Netherlands	00800 72332255
Luxembourg	00800 72332255
Spain	00800 72332255
Norway	00800 72332255
Switzerland	00800 72332255
Sweden	00800 72332255
United Arab Emirates (Abu Dhabi)	8000 4413376
UK	0800 915 1571

Americas

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

Asia Pacific

Country	Telephone
Australia	0011 800 72332255
China	Unicom 10800 7440605
	Telecom 10800 4400682
Hong Kong	3077 5524
Japan	0120 921067
Indonesia	00180 344 0884
Singapore	800 448 1773
Malaysia	1800 220 054
Taiwan	00800 72332255
South Korea	Korea telecom 001 800 72332255
	DACOM 002 800 72332255
Thailand	CAT 001 800 72332255
	Other networks 00800 72332255

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