



# Fidelity International's Supplier Code of Conduct & Ethics

Setting expectations around our supply chain practices

# Supplier Code of Conduct & Ethics (“Supplier Code”)

This Supplier Code applies to the following:

- Any third party, organisation or individual that provides goods or services to FIL directly or indirectly (“**Suppliers**”)
- Vendors, consultants, agents, contractors, temporary workers, and third parties working on behalf of FIL
- Owners, officers, directors, employees, consultants, affiliates, contractors, and subcontractors of those third parties

## Overview

Integrity and high ethical standards are vital components of all we do at Fidelity International (“FIL”). We understand that we need to lead by example in the way in which we do business to protect the reputation of the organisation and merit the ongoing trust of our clients and investors.

FIL recognises that its Suppliers are an extension of its own business footprint and as such we seek to partner with Suppliers who operate in accordance with our own business values. This document outlines our expectations of Suppliers in more detail and highlights communication channels which Suppliers can use to discuss issues relating to working with FIL. Where services are subcontracted by our Suppliers, we expect the requirements of this document to be cascaded by our Suppliers and monitored accordingly.

FIL will always require its Suppliers to conduct their business activities in accordance with all applicable laws, rules, and regulations. In instances where values outlined within this document differ from local rules and customs, we expect Suppliers to work in accordance with the stricter requirements, within the context of the customs and local laws of their specific geography.

## Key Updates from the Previous Version

- Addition of this ‘Updates’ section for ease of annual review
- Addition of section on Artificial Intelligence (AI) and Generative Artificial Intelligence (GAI)

## Protection of Assets

The safeguarding and protection of client assets, including data, is essential to retaining clients' trust and building a successful financial solutions business. As Suppliers to FIL, we expect you to:

- Respect the assets of FIL and our clients, making use of assets only when appropriately authorised to do so.
- Ensure the privacy and protection of any personal data entrusted to you by FIL, our clients, and others, in accordance with our [Supplier Privacy Policy](#).
- Ensure that all uses of data, such as collection, processing, and storage, take place in accordance with applicable laws and regulations.
- Ensure that any data sharing activities are only completed with the express contractual permissions of FIL.
- Ensure not to engage in any advertising, marketing, or promotional activities that reference Fidelity or its logo, products, or services in any manner.

## AI and GAI

1. **Disclosure of AI Features:** Suppliers must fully disclose the presence and functionality of any Artificial Intelligence and Generative AI features in their products or services. This should include information about the type of AI used, its purpose, and its potential impact.
2. **Opt-Out Provision:** Suppliers should provide options for us to opt out of AI and Generative AI features or offer equivalent non-AI alternatives.
3. **Data Retention and Use:** Suppliers must not use or retain our data for model training (or any other) purposes without our explicit written consent.
4. **Transparency and Explainability:** Suppliers should ensure an adequate standard of transparency and explainability in the AI systems used in the delivery of services to us. This includes providing appropriate information about the underlying model, the data used to train the model, and the logic behind AI-generated outcomes, even if the model is proprietary.
5. **Third-Party Provider Oversight:** If suppliers use third-party providers to develop or operate the AI systems, they should implement appropriate risk management and supervision measures to ensure that these providers adhere to the same standards of transparency, data protection, and ethical AI use.
6. **Data Ethics and Legal and Regulatory Compliance:** Suppliers are responsible for ensuring that any AI system used in their products and services are compliant with the applicable law and regulation pertaining to the system type and the market(s) in which it or they will be deployed.

## Conflicts of Interest

In order to maintain our reputation for integrity, FIL and its Suppliers must identify and declare any instances of apparent or actual conflicts of interest. For our Suppliers this includes, but is not limited to, the following:

- Dealing with any FIL employee whose spouse, domestic partner, or other family member or relative holds a significant financial interest in the Supplier.
- Ensuring that any Supplier personnel who is working closely on the FIL account or holds a senior role, and whose spouse, domestic partner, or other family member or relative works at FIL is disclosed to FIL to mitigate any actual, potential, or perceived conflicts of interest.
- Any gifts, meals or entertainment must comply with applicable laws, must not violate the giver's and/or recipient's policies on the matter, and must be consistent with local custom and practice. Issuing gifts to FIL employees - even a well-intentioned gift - might constitute a bribe under certain circumstances, or create conflicts, or perceived conflicts of interest and as such must be avoided. FIL's expectation is that gifts will be low value promotional or nominal items (valued less than US\$50 or local currency equivalent).
- No items of value, including gifts or entertainment, should be given where it could be perceived to influence FIL business decisions. FIL employees are expressly prohibited from accepting gifts and entertainment when there is a current or potential sales pitch, tender or bid process, or an active opportunity with FIL.

## Financial Crime

FIL has zero tolerance for being a party to or being used as a vehicle for financial crime. This applies equally to colleagues and Suppliers operating of FIL's behalf.

FIL prohibits Suppliers from giving or receiving bribes or accepting improper payments to obtain new business, retain existing business, or secure any improper advantage and using or permitting others to do so. This includes any type of facilitation payment, even where such payments are perceived as a common part of local business practice.

FIL expects all Suppliers to comply with all applicable financial crime related (anti-bribery and corruption, anti-money-laundering and terrorist financing, and international sanctions) laws and regulations in all relevant jurisdictions including implementing relevant policies and procedures and maintaining accurate accounting records.

FIL expects suppliers to inform us, as soon as possible, either through their business relationship manager or if more appropriate our whistleblowing hotline, of any attempts made to bribe and any suspicions about bribery and corruption as well as any other significant financial crime related breaches in particular regarding international sanctions, that might impact FIL.

## Environmental Management

FIL recognises its social responsibility to protect the environment and expects its Suppliers to share its commitment by responding to challenges posed by climate change and acting to protect the environment.

Suppliers should develop, implement, and maintain environmentally responsible business practices including:

- Working in compliance with all applicable environmental laws and regulations
- Reducing their environmental impacts wherever possible, e.g. resource consumption, air emissions (including those contributing to climate change), water consumption management of hazardous waste and waste production
- Suppliers must obtain, maintain, and keep current all required environmental permits and registrations and follow the operational and reporting requirements of such permits, as required by law.
- Collaborate with us to help us reduce your and our environmental impacts.
- Understand environmental sustainability-related practices of your operations and your supply chain to either collaborate on best practice or offer support on improvements where appropriate.

## Labour and Human Rights

FIL is committed to promoting the importance of fundamental human rights through our business operations, our investments and to our employees, clients, suppliers and the wider communities in which we operate. We expect the same commitments from our suppliers.. We are led by fundamental human rights and labour principles such as the International Labour Organisation (ILO) Core Conventions and we comply with all relevant regulations, including the UK Modern Slavery Act 2015 and treat all employees fairly, with respect and dignity at work.

FIL commits to respect human rights through our supply chain by taking appropriate actions to identify, prevent, mitigate or remediate human rights issues through ensuring that behaviours and practices that are consistent with our own:

- **Health & Safety**  
Provision of a safe and hygienic workplace that minimises health and safety risks and supports accident prevention for all personnel, bearing in mind the prevailing knowledge of the industry, local health and safety laws and of any specific hazards.
- **Freely Chosen Employment**  
The use of forced labour whether in the form of indentured labour, bonded labour, or prison labour by FIL Suppliers is prohibited.
- **Avoidance of Child Labour**  
Suppliers must comply with all local and national minimum working age laws or regulations and not use child labour. Suppliers cannot employ anyone under the age of 15, under the age for completing compulsory education, or under the legal minimum working age for employment—whichever is higher.

- **Working Hours**  
Ensuring that working hours are not excessive and that working hours must not exceed the maximum hours of daily labour set by local and national laws or regulations.
- **Wages & Benefits**  
Being responsible for timely compensation and payment of fair wages. All employees should be paid a fair wage aligned with prevailing industry conditions and local minimum wage requirements - whichever is higher. Any overtime should be voluntary and compensated appropriately.
- **Freedom of Association**  
Respecting the rights of workers in relation to freedom of association. Where the right of freedom of association and collective bargaining is restricted by law, the Supplier will not hinder the development of alternative means for consulting with employees.
- **Avoidance of Discrimination**  
Promoting a working environment that is free from discrimination, harassment or victimisation or abuse on any grounds.

## Diversity and Inclusion

FIL has a long-standing commitment to diversity and inclusion (D&I). We demonstrate our commitment by supporting campaigns and initiatives, which challenge organisations to do more including: the Women in Finance Charter, the Race at Work Charter, the Valuable 500 Initiative, and the UN LGBTI Standards of Conduct in Business. We expect our suppliers to demonstrate behaviours and practices that are consistent with our own on D&I, including policies against discrimination and harassment. We also encourage our Suppliers to partner with us to achieve excellence in equality, diversity, and inclusion through:

- **Workplace inclusion**  
Documenting a Diversity and Inclusion approach, which as a minimum should include commitments to identify, measure and improve a culture of inclusion for all stakeholder groups.
- **Avoidance of Discrimination**  
Promoting a working environment for colleagues and clients that is free from discrimination, harassment or victimisation or abuse on any grounds, including but not limited to age, caring responsibilities, disability or long-term health condition (physical or mental), gender identity, expression or reassignment, intersex status, marital or family status (including civil partnership), pregnancy or maternity, national or ethnic origin (race, colour, descent, membership of the Traveller community), religion or belief, sex, sexual orientation and socio-economic background.
- **Inclusive supply chain management**  
Encourage the principles of inclusion and accessibility through their supply-chain. We would also encourage our suppliers to work with diverse businesses and foster inclusive procurement activities within their own organisation.



- **Accessibility**

Providing products and services which meet internationally recognised standards of accessibility for people with disabilities.

FIL is proud to be a Disability Confident Leader, making the most of the talents disabled people can bring to our workplace. We are committed to promote the UK national scheme - Disability Confident - to our UK-based suppliers to help them to recruit and retain great people, draw from the widest possible pool of talent, secure high-quality staff who are skilled, loyal and hardworking and improve employee morale and commitment by demonstrating that they treat all employees fairly.

(More information - <https://disabilityconfident.campaign.gov.uk/>).

- **Vulnerable customers**

Recognising that some people's situations and experiences with changes in health, capability, resilience, or life events can impact on their needs. We ask our Suppliers to support our mission to ensure that outcomes for vulnerable customers are the same as for other customers, providing them with any additional support needed to deliver this.

## Monitoring and Oversight

FIL reserves the right to monitor and audit its supplier's compliance with our Supplier Code.

Similarly, you are required to evaluate your supply chain to ensure compliance with our Supplier Code and to conduct audits of your supply chain when requested by FIL. Any non-compliance by you or your supply chain must be effectively remedied both in a timely manner and at no additional cost to us or our customers.

Suppliers are required to have controls and processes in place which are designed to protect FIL's customer information, assets, and reputation. The supplier must never forward FIL information to a non-approved external email address for any non-business purpose.

**Breaches of the Supplier Code may negatively impact your business relationship with FIL.**

## Raising a Concern

FIL believes that a strong ethical culture depends upon operating an open environment in which employees feel free to report instances of non-compliance with our Code or Supplier Code. We are committed to investigating reports of suspected or known misconduct, and to taking appropriate action based on our findings.

Similarly, you – including your employees and your supply chain – are obliged to report to us suspected or known misconduct. Suspected or known misconduct must be reported by speaking with the relevant FIL relationship manager or, if you prefer, you may report suspected or known misconduct confidentially and anonymously through our Confidential ALert Line (CALL).

CALL is a discreet online and free-phone service that is managed by a third-party vendor, Navex. All communications are handled in-house by Navex and are available 24/7 in international languages. The service is accessible for reporting or discussing concerns about suspected, questionable or unethical business practices or any possible or actual breach of regulation.

Incidents can be reported by accessing:

<https://secure.ethicspoint.eu/domain/media/en/gui/107150/index.html>. The website provides the option to report incidents directly in the web portal or you can access the freephone numbers on the welcome page once you have selected the country you are located in.

### **No retaliation**

FIL does not retaliate against anyone for submitting in good faith a report of suspected or known misconduct, nor do we tolerate others retaliating. Similarly, you must not retaliate or tolerate retaliation against anyone who, in good faith, reports suspected or known misconduct. “Good faith” means that to the best of a person’s knowledge and belief, everything reported is true and that everything known is reported.