



# The Quilter Supplier Code of Conduct

*Doing business the right way*



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## 1. Introduction

Quilter is a leading UK-centric wealth management business, helping to create brighter financial futures for every generation.

Quilter has an adviser and customer offering spanning: financial advice; investment platforms; multi-asset investment solutions; and discretionary fund management.

We are committed to the highest standards of governance and conduct in every aspect of our business, and we want to work with suppliers who share this commitment.

This supplier Code of Conduct (the 'Code') applies to all suppliers and their sub-contractors that provide goods and services to any company in the Quilter group. The Code sets out the minimum standards we expect our suppliers to adhere to when doing business with Quilter and is complemented by agreed contractual terms. We also expect our suppliers to promote adherence to these standards through their own supply chain where practical.

Suppliers must be able to demonstrate adherence to the Code if requested by Quilter and we reserve the right to audit suppliers where necessary to assess compliance.

## 2. Standards

### *i) Business conduct*

**Legal compliance** – we expect all our suppliers to comply with all applicable laws and regulations in all the countries in which they operate, and within their supply chains. Where the standards set out in this Code go beyond legal requirements, we expect suppliers to adhere to them unless doing so conflicts with applicable local laws.

**Ethical standards** – we expect all our suppliers to operate their business with the highest standards of integrity, honesty and ethical conduct. Suppliers must have the necessary policies, systems and processes in place to prevent unethical conduct, which may include, but is not limited to, market abuse, breaches of sanctions legislation, information security, tax evasion, money laundering, fraud, bribery and corruption, and any other improper payments.

**Conflicts of interest** – where a supplier identifies an actual or potential conflict of interest that could result in improper, unethical, or non-impartial behaviour, this must be reported to a senior member of Quilter's Procurement and Supplier Management team. Any such conflict will be jointly assessed and investigated, with an appropriate outcome agreed.

**Anti-bribery and corruption** – we expect all our suppliers to comply with all applicable anti-bribery and corruption laws in the countries in which they operate, for example the Bribery Act 2010 in the UK. For the avoidance of doubt, suppliers must not participate in unlawful cartels, make political donations or offer inducements, gifts or entertainment to public officials. Similarly, suppliers must not offer or accept inducements, gifts or entertainment, to or from Quilter employees, other than those approved by Quilter management.

**Financial Crime** – Suppliers and associated third parties are expected to comply with all applicable financial crime laws in the countries which they operate, including the Bribery Act 2010 as noted above, the Fraud Act 2006, Economic Crime and Corporate Transparency Act 2023 Corporate Offence of Failure to Prevent Fraud, applicable sanctions imposed by HM Treasury, the US Office of Foreign Assets Control, the EU and in the countries where they operate and the Money Laundering Regulations where relevant.

**Brands, trademarks and intellectual property** – suppliers must not use Quilter brands or intellectual property in any literature or communication in any form without our prior permission. Suppliers shall not undertake any work for Quilter that could infringe any third party's intellectual property rights. Suppliers must indemnify Quilter against losses, damages, costs or expenses and any other liabilities arising from a third party intellectual property or trademark claim.

**Information Security** – We expect all our suppliers to implement and operate appropriate organisational and technical measures to protect the confidentiality, availability and integrity of Quilter information and data assets,

and of all systems storing or processing said assets, in accordance with their classification. Suppliers must have processes in place to regularly assess changes in the security threat landscape and to update their controls where required, ensuring they remain demonstrably effective and proportionate to the risk.

**Data Protection** – we expect all our suppliers to comply with all applicable data protection laws in the countries in which they operate, for example the UK Data Protection Act and the UK and EU GDPR.

**Operational Resilience** – we expect all our suppliers to comply with all applicable operational resilience regulations in the countries in which they operate. We expect suppliers to manage business continuity and operational resilience risks and assure the availability of their services during a disruptive event. Suppliers should have recovery plans in place that are regularly tested for their business and key contractors to continue with minimal interruption should there be a disruption to the services they provide.

## *ii) Labour standards and human rights*

**Legal compliance** – we expect all our suppliers to comply with all applicable employment laws and regulations such as those relating to pay, conditions, working hours, employment terms and discrimination and strive for best practice where possible.

**Living Wage** – Quilter is an accredited Living Wage employer. As such, suppliers whose employees work on our premises for two or more hours of work a week, for eight or more consecutive weeks in a year must be paid the applicable real living wage hourly rate which is linked to the real cost of living. The rate is reviewed, determined and typically published each October by the Living Wage Foundation, with employers having 6 months from the time of announcement to make the necessary adjustments to employees' pay in order to comply.

**Discrimination** - Quilter has zero tolerance for harassment, abuse, discrimination, or bullying. Suppliers are expected to uphold these standards in their day-to-day operations and within the communities in which they operate.

**Modern slavery** – Quilter expects suppliers to take robust, proactive measures to prevent modern slavery and human trafficking within their operations and supply chains. In line with the *UK Modern Slavery Act 2015* and the UK Government's 2025 statutory guidance on transparency in supply chains, suppliers should:

- Prohibit all forms of modern slavery, including slavery, servitude, forced or compulsory labour, bonded labour, and human trafficking;
- Undertake ongoing modern-slavery due diligence considering relevant international standards, including the OECD Due Diligence Guidance and the UNGPs, ensuring that risks are effectively identified, mitigated and addressed throughout their supply chains;
- Engage with workers, trade unions, and stakeholders, ensuring concerns can be raised safely and anonymously, and take a victim-centred approach to remediation where potential harm is detected;
- Take appropriate action when modern slavery issues are identified, either via complete disengagement or collaboration to remediate harms.
- Develop and maintain policies and training on modern slavery;
- Report transparently on modern slavery activity and preventative actions; and
- Cooperate with Quilter's due diligence, audits, and information requests, including providing data on risk assessments, mitigation measures, and supply chain structure where relevant.

Suppliers must comply with applicable modern slavery laws in all jurisdictions in which they operate and commit to continuous improvement in preventing, identifying, and addressing modern slavery risks.

**Diversity, Equity, and Inclusion** - At Quilter, we firmly believe that a diverse, inclusive, and supportive workforce is key to our success. Our suppliers should foster diverse, equitable and inclusive workplaces where all employees feel valued, respected, and empowered to contribute to their fullest potential. This includes ensuring fair processes in recruitment, development, and progression,

and creating an environment where different perspectives and experienced are embraced. Suppliers are encouraged to take measurable steps to advance diversity, equity, and inclusion within their organisations and supply chains.

**Health and safety** – we expect all our suppliers to uphold high standards of occupational health and safety by applying a robust health and safety management system appropriate for their business. Suppliers and their subcontractors shall comply with all applicable occupational health and safety legislation in the jurisdiction in which they operate, such as the UK's Health and Safety at Work etc Act 1974, along with the requirements detailed within Quilter document HSP 03 'Contractor Management Guidance' (and associated documents). Suppliers are to maintain a safe work environment by implementing effective health and safety management arrangements to protect employees, safeguard third parties, and prevent accidents, injuries, and work-related illnesses. Risk assessments are to be conducted that are appropriate to the nature of the work activities carried out, ensuring the implementation of effective risk controls which are regularly reviewed for continued effectiveness. Employees must be provided with information, instruction, and training to enable them to work safely. Furthermore, all personnel must be adequately supervised and comply with site-specific rules relevant to the working environment.

### *iii) Environmental management*

Quilter is committed to environmental protection and to the sound management of its exposure to all environmental risks, including those related to the climate. Suppliers must comply with all applicable environmental laws and regulations and, where appropriate, best practice standards.

We expect all our suppliers to adopt appropriate policies and management systems to identify, assess and manage their exposure to all material environmental (including climate-related) risks. Suppliers are also expected to assess, manage and, where appropriate, reduce their impacts, both direct and indirect, on the environment.

On request by Quilter, in relation to the goods and services provided, suppliers must provide relevant environmental information, including information on the supplier's exposure to and management of current or potential climate-related risks (both of a physical and transitional nature). On request from Quilter, suppliers should also provide relevant information regarding the supplier's impact on the environment and management actions taken to mitigate those impacts.

## 3. Regulatory

Quilter operates within a regulated financial services environment and is required to deliver good outcomes for customers. Suppliers are expected to conduct their activities in a way that supports Quilter's regulatory obligations, including acting with integrity, due skill, care and diligence, and operating transparently and cooperatively. Suppliers must support good customer outcomes by acting in good faith, avoiding foreseeable customer harm, and promptly escalating any issues that could adversely affect customers, Quilter's regulatory compliance, or its reputation.

## 4. Reporting

For general queries relating to this Code, suppliers should contact their normal Quilter contact. However, if a supplier has a genuine concern relating to actual or potential non-compliance with this Code, or other danger, fraud or other illegal or unethical conduct in the workplace they may report it via our whistleblowing procedure provided by Navex Global. This is independent of Quilter and concerns can be reported anonymously and confidentially. The Freephone hotline, is available 24hrs, 365 days of the year with live interpreters available to overcome any potential language barriers:

- UK, Isle of Man and Channel Islands: 0800-89-0011
- Ireland: 1-800-550-000
- UFIN 00-800-222-55288

When making a report you will be required to input the following code when requested 833-778-1557) or alternatively you can use the secure online portal [quilter.ethicspoint.com](https://quilter.ethicspoint.com). The information given to Navex Global will be passed on to senior executives of Quilter who will act on it without compromising the information provider in any way.

## 5. Monitoring

High-risk suppliers must confirm their compliance with this Code at the outset of the engagement and on an ongoing basis thereafter.

Any questions or requests for clarification regarding the Code should be raised promptly.