Barclays Supplier Code of Conduct

Introduction

As one of the world’s largest financial service institutions, we understand that we need to lead by example in the way we do business. We seek to reinforce our business integrity by striving to improve the service that we provide, making responsible decisions in how we manage the business, and actively managing the social and environmental impacts of what we do to help individuals, communities, businesses and economies progress and grow. Our goal is to drive excellence in these areas throughout our own organisation, and to support and influence positively the development of these areas in our supply chain.

Barclays will always require that our Suppliers comply with all applicable laws, regulations and standards within the geographies in which they operate. In instances where standards outlined within this document differ from local laws and customs, we expect Suppliers to respect these standards within the context of the customs and the local laws of their specific geography.

Definitions

“Supplier” means any firm or individual that provides a product or service to Barclays or to any of its clients either directly or indirectly.
1. Environmental Management

Barclays recognises that the management of environmental impacts is integral to good business practice, as is outlined within the Barclays Environmental Sustainability Policy. We encourage our Suppliers to join us in similar environmental efforts to implement Environmental Management Systems (EMS) as appropriate to their businesses, and align with best practice activities including the following:

- **Set Environmental Targets**
  Maintain environmental policies, objectives or targets which as a minimum include commitments to identify, measure and reduce significant environmental impacts.

- **Reduce Environmental Impacts**
  Endeavour to reduce operational environmental impacts. Impacts could include resource consumption, air emissions (including those contributing to climate change), water consumption, management of hazardous materials, recycling and waste production.

- **Report Progress**
  Disclose required information or provide to Barclays, as appropriate, data to demonstrate environmental performance

2. Human Rights

Barclays supports the protection of human rights around the world and is guided by fundamental principles such as those in the United Nations Universal Declaration of Human Rights and the International Labour Organisation (ILO) Core Conventions. This support is reflected in our policies and actions in the countries in which we do business.

Barclays seeks to support human rights through our supply chain by encouraging behaviours and practices that are consistent with the objectives of the Barclays Statement on Human Rights. We welcome relationships with our Suppliers as opportunities to improve and evolve practices with respect to Human Rights. These behaviours and practices consider specifically:

- **Health and Safety**
  Provision of a safe and hygienic working environment that minimises health and safety risks and supports accident prevention for all personnel, bearing in mind the prevailing knowledge of the industry, the requirements of local health and safety laws and of any specific hazards. A guideline document is available upon request.

- **Freely Chosen Employment**
  Ensuring that all work is completed voluntarily. Personnel should not be forced, bonded, indentured, or subject to threat or involuntary prison labour.

- **Avoidance of Child Labour**
  Child labour should not be employed. The term 'child' refers to any person less than 15 years of age (or 14 where the law of the country permits), unless the minimum age for work or mandatory schooling is stipulated as being higher by local law, in which case the stipulated higher age applies in that locality.

- **Working Hours**
  Ensuring that all workers are entitled to work and be paid for a minimum level of working hours; that working hours are not excessive; and that maximum working hours comply with national laws.
• **Wages and Benefits**
Being responsible for employee compensation and payment of fair wages. All employees should be paid a fair wage commensurate with prevailing industry conditions or the minimum wage, whichever is higher. Any overtime should be voluntary and compensated appropriately.

• **Employee 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 under law, the Supplier will not hinder the development of alternative means for informing/consulting with employees.

### 3. Diversity and Inclusion

Barclays has a firm commitment to enable equality of opportunity and workplace cultures that promote inclusion, as outlined in the [Barclays Diversity Charter](#). We not only meet the basic legal requirements in every jurisdiction we operate in, but seek to lead the way in this area. We encourage our Suppliers to partner with us to achieve excellence in equality, diversity and inclusion through:

• **Workplace Inclusion**
Actively demonstrating commitment to equality, diversity and inclusion through all aspects of workplace management giving clear consideration to equality of opportunity in employment. Documenting a Diversity and Inclusion approach, which as a minimum should include commitments to identify, measure and improve a culture of inclusion for each of their stakeholder groups; with clear accountability and monitoring of progress.

• **Avoidance of Discrimination**
Promoting a workplace free from discrimination, harassment, victimisation, or any other form of inappropriate behaviour or abuse on any grounds (including but not limited to age, disability, ethnic origin, gender, nationality, marital status, parental status, physical appearance, political convictions, pregnancy, race, religious beliefs, sexual orientation, social origin or union affiliation).

• **Customer-focused Accessibility and Inclusion**
Embedding relevant accessibility standards, innovation and best practice to deliver inclusive products and services for our customers and stakeholders. Encouraging Suppliers to demonstrate commitment and ability to support Barclays’ aim to deliver products and services that meet the accessibility needs of our diverse customers and stakeholders, including the needs of people with disabilities. Striving to go beyond minimum accessibility standards compliance by ensuring that appropriate consultation and testing with consumers is recognised as a key enabler of accessibility.

• **Inclusive supply chain management**
Drive active management of downstream supply chains as part of their commitment so that the principles of inclusion and accessibility are encouraged through their supply chain. As part of this active management we would also encourage our suppliers to work with diverse businesses and ensure inclusive sourcing activities and decisions within their own organisations.
4. Living the Barclays Values

Barclays is committed to helping people achieve their ambitions, in the right way. This purpose includes our clients and customers and is achieved through the demonstration of the Barclays Values and Behaviours by those who interact with them:

- **Respect** – We respect and value those we work with, and the contribution that they make
- **Integrity** – We act fairly, ethically and openly in all we do
- **Service** – We put our clients and customers at the centre of what we do
- **Excellence** – We use our energy, skills and resources to deliver the best, sustainable resources
- **Stewardship** – We are passionate about leaving things better than we found them.

We encourage our Suppliers to partner with us in achieving this goal, by ensuring that all their employees and sub-contractors who interact with Barclays’ personnel, clients and customers on Barclays’ behalf, demonstrate these Values and Behaviours. We want all Suppliers, clients and customers to have an experience that reflects the Values and Behaviours and reinforces their perception of Barclays as their ‘Go-To’ bank.

We request that where appropriate, you cascade to your employees the information contained in Our Purpose and Values Guide, to help them to reflect and demonstrate the Barclays Values in their interactions with Barclays clients and customers.

If you have any concerns regarding the Barclays Values and Behaviours not being upheld please contact us here.

5. Raising a Concern (Whistleblowing)

Barclays is committed to conducting all of its business activities ethically and in accordance with applicable laws and regulations, and the highest professional standards. Integrity in our business behaviour and in our management systems is crucial to the success of Barclays, our customers and our shareholders, as well as the fulfilment of our corporate responsibilities.

The Barclays Global Whistleblowing Policy reflects our commitment to ensuring that concerns of potential breaches of laws, rules, regulations or Compliance Policy raised in good faith are handled in an appropriate manner and rectified as necessary. Whistleblowing is the process through which you can report, in confidence, such potential breaches. This could mean fraud, criminal behaviour, ethical issues, behaviour that is not in keeping with our stated Values, or breaches of financial services, health and safety or regulatory obligations - or the deliberate concealment of any of those things.

Our suppliers and sub-contractors can raise any concerns in confidence or anonymously (where permitted) by going to:

https://secure.ethicspoint.eu/domain/media/en/gui/36145/index.html

All reports will be treated seriously.