

Fidelity Supplier Code of Conduct & Ethics

Overview

Integrity and high ethical standards are vital components of all we do at 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.

Definitions

FIL defines a Supplier as any third party, organisation or individual that provides goods or services to FIL directly or indirectly. The following persons are covered by the Fidelity Supplier Code and subject to its provisions:

- 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 these third parties.

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.
- 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 declared
- 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 when there is a current or potential sales pitch, tender or bid process, or an active opportunity with FIL.

Financial Crime

FIL has a zero tolerance to 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 anti-bribery and corruption laws and regulations in all relevant jurisdictions including implementing ABC policies and procedures and maintaining accurate accounting records.

FIL expects suppliers to inform us, 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

Protection of Assets

The safeguarding and protection of client assets, including data, is the fundamental purpose of FIL. 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 protection of any data entrusted to you by FIL, our clients and others

- 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

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.

Human Rights

FIL supports the protection of human rights globally. We are led by fundamental principles such as the International Labour Organisation (ILO) Core Conventions and we comply with all relevant regulations, including the UK Modern Slavery Act 2015.

FIL seeks to support human rights through our supply chain by encouraging 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.

Diversity and Inclusion

FIL is committed to enabling equality of opportunities and workplace cultures to promote inclusion and adheres to the UN Standards of Conduct for Business. We 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, disability, ethnic origin, gender, gender identity and expression, race, sexual orientations, nationality, marital status, parental status, physical appearance, political convictions, pregnancy, religious beliefs, social origin or union affiliation

- **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

Monitoring and Oversight

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

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.

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 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.