

# Supplier Code of Conduct

We're delighted that you'd like to find out more about working with Hymans Robertson. Our Supplier Code of Conduct sets out the **minimum** standards of business conduct that we expect our suppliers to meet. It applies to anyone providing services to Hymans Robertson LLP and/or any of our Group Companies.



## TOGETHER, BUILDING BETTER FUTURES

Hymans Robertson has been in operation for over 100 years, continually evolving our practices and embracing new techniques to navigate uncertainty. The firm emphasises a straightforward and cooperative working style, investing in its workforce, technology, and lasting partnerships, including those with essential service providers.

Guided by our Purpose 'Together, building better futures' Hymans Robertson strives to positively impact society. This philosophy embraces how we engage with staff, clients, communities, and the environment.

To promote fairness and equity, Hymans Robertson upholds policies ensuring all individuals connected to the business are treated equally, and it expects its suppliers to adhere to these same principles. To align with this, suppliers are required to enforce these standards throughout their own supply chains.



## MINIMUM STANDARDS

Our start point is that our suppliers must in all instances comply with all applicable laws, rules, regulations, and requirements, and have policies and procedures in place to ensure compliance.

We want to build collaborative relationships with our suppliers and expect them to always act ethically and with integrity. This means we want our suppliers to be transparent and honest with us; to act within the bounds of their competence and skill and conduct their business operations with respect for others. Your employees should be given the means and forum to raise concerns and issues internally without fear of disadvantage.

As part of our ongoing relationship with a supplier, suppliers may be requested to complete regular due diligence refreshes. This ensures ongoing compliance with our Supplier Code of Conduct, verifies adherence to legal and ethical standards, and allows us to identify and address any risks or changes in supplier status. Suppliers may be asked to provide evidence of compliance or participate in audits, supporting our commitment to responsible supply chain management.



## Anti-bribery and anti-corruption (including gifts, hospitality, and entertainment)

We have a zero-tolerance policy towards bribery and corruption. To eliminate the risk of it being an issue, we operate strict policies with regards to the giving and receiving of hospitality, entertainment and gifts.

We require our suppliers to:

- Take all reasonable steps to remove the risk of corruption within their supply chain and comply with the Bribery Act 2010 (and/or all relevant laws and regulations in the jurisdictions in which they operate).
- Ensure that any gifts or hospitality offered or received are not excessive or inappropriate in their nature. Gifts or hospitality will be recorded and those of a higher value (which in all cases should be set in line with any regulatory requirements/expectations) are subject to internal approval prior to acceptance.
- Ensure that any offer of a gift or hospitality is not intended to unfairly influence or provide advantage to an individual or business outcome and does not create a conflict of interest.
- Decline to accept/not offer any invitations to sporting events; musical or theatrical concerts or events; themed evening entertainment or social events such as bowling (regardless of whether the supplier is there or not).
- Not offer or accept monetary gifts, including vouchers, under any circumstances.



## Conflicts of interest

We operate strict policies with regards to the identification and management of conflicts of interest. Suppliers must not allow bias, conflict of interest or inappropriate influence of others to override professional requirements, judgment, and responsibilities.

We require our suppliers to:

- Have appropriate policies and/or procedures in place in relation to the identification and management of any conflicts of interest.
- Disclose any actual or potential conflicts of interest to us in relation to the services being provided to us (whether due to personal or business relationships).



## Financial crime

We're committed to preventing all forms of financial crime including money laundering, terrorist financing, sanctions violations, tax evasion (including facilitation of tax evasion) and fraud (collectively "financial crime").

We require our suppliers to:

- Comply with all applicable laws and regulations in relation to financial crime.
- Not enter any arrangement or provide any service that facilitates, or may constitute, Hymans Robertson being directly or indirectly involved with financial crime.



## Anti-slavery, human trafficking and human rights

We publish an annual Modern Slavery Act Transparency Statement and are committed to enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains. Therefore, our suppliers must take a zero-tolerance approach towards human rights breaches, slavery and human trafficking and implement appropriate steps to actively monitor and mitigate the risks throughout their supply chain.

We require our suppliers to comply with the Human Rights Act 1998 and Modern Slavery Act 2015 and to meet the following requirements:

- Workers must be paid a fair wage which at least observes local laws for minimum wage.
- Workers must be employed of their own free will and are free to resign from their employment without restriction or penalty (not including reasonable and lawful restrictive covenants).
- Provide an open communication channel for workers to raise concerns about modern slavery without fear of penalty or punishment.
- All workers must be provided a written contract in a language they understand.
- Working conditions must be safe and hygienic.
- Child labour must never be used or tolerated.
- Workers must have the right to collective bargaining and freedom of association.
- No offences under either the Humans Rights Act 1998 or Modern Slavery Act 2015 have been committed in your organisation or supply chain.
- Comply with working hours requirements in accordance with all applicable laws and regulations.



## Corporate Social Responsibility (CSR)

We are a purpose-led business committed to having a positive impact on our people, our clients, our communities and the environment. We want to work with suppliers who share the same goals. We welcome suppliers sharing their CSR initiatives and policies with us and vice versa.

We require our suppliers to:

- Measure, limit and reduce their carbon footprint wherever possible in line with Science Based Targets.
- To provide details of your carbon emissions and reduction goals when requested.
- Minimise environmental impact relative to their business operations.
- Support communities with positive initiatives for example, by engaging in charitable operations or by providing a real living wage.



## Diversity, Equity, and Inclusion (DEI)

We're committed to promoting equity and inclusion and respecting all aspects of diversity.

We encourage suppliers to create a similar work environment for their own employees and actively seek opportunities to enhance diversity.

We require our suppliers to:

- Ensure that no persons will be treated unfairly or discriminated against in line with the UK Equality Act 2010 (and/or all relevant laws and regulations in the jurisdictions in which they operate).
- Embrace diversity and work proactively to encourage equity and inclusion, including by providing DEI education and training relevant to the size and operation of their business.
- Maintain a regularly reviewed Diversity, Equity and Inclusion (DEI) policy or approach that is proportionate to the size and nature of the business. This should include mechanisms to assess the effectiveness of implementation and demonstrate a commitment to continuous improvement.



## Information Security (IS) and Data Protection (DP)

Information Security and Data Protection are hugely important to understand, and we take our responsibilities seriously. We require our suppliers to support us in achieving the highest levels of information security and data protection.

References to data below include personal data and confidential information and includes Hymans Robertson's data and any data relating to customers, our clients, or their scheme members.

We require our suppliers to:

- Have policies and procedures in place to protect data which are proportionate to business operations. These must be in accordance with national laws including the UK or EU General Data Protection Regulation (GDPR) as applicable, and must comply with all data protection laws applicable to the services being provided,
- Implement measures to limit exposure to potential cyber or physical security threats.
- Support Multi-Factor Authentication (MFA) where our data solutions are hosted in the cloud.
- Ensure any software solutions provided are kept in support for the duration of our use.
- Ensure that any of our data or intellectual property accessed or processed is done so in a strictly confidential manner and limited to persons on a need-to-know basis.
- Report any compromise or potential compromise of data or any other incident suspected of impacting the security or confidentiality of our data to us immediately.
- Secure all electronic external information transfers involving our data using industry standard encryption techniques.



## Use of Gen AI

We support the integration of generative artificial intelligence (“Gen AI”) technologies in our supply chain. We understand that Gen AI can enhance operational efficiency, user Experience and the quality of services and deliverables. However, use of Gen AI must comply with all applicable laws and regulations, and ensure the integrity, security, and confidentiality of our and our clients’ data. If the inputs or outputs in a Gen AI system or model include data provided by us, we (or our licensors) will retain the intellectual property rights to that data and the related inputs or outputs.

We require our suppliers to:

- Maintain records of Gen AI processes and decision-making criteria for transparency.
- Ensure that its Gen AI systems are secure, and that any data processed by these systems is protected against unauthorised access, use, or disclosure.
- Implement Gen AI ethically and take steps to avoid unfair or discriminatory practices and other harms.
- Conduct regular audits and testing to monitor its Gen AI systems for accuracy, performance and bias.
- Stay updated with Gen AI advancements and continuously improve its Gen AI applications to ensure effectiveness and reliability.
- Obtain our written consent before our data or confidential information is used to develop, train, fine-tune or validate any Gen AI systems or models.
- Ensure a consistent approach to managing the use of Gen AI within its own supply chain.

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