

EFG Supplier Code of Conduct

EFG conducts every aspect of our business with honesty, integrity and openness.

We always respect the human rights and the interests of employees, customers and third parties. Responsibility is at the core of our business, and we are committed to international initiatives and standards such as the OECD Guidelines for Multinational Enterprises, the UN Global Compact, the Fundamental Conventions of the International Labour Organisation and the UN Universal Declaration of Human Rights.

We want to develop and maintain strong business relationships with suppliers who are committed to ethical standards equivalent to our own. This Supplier Code of Conduct sets out the standards with which all companies providing products and/or services to any EFG company (“Suppliers”) are expected to comply. This includes the Suppliers’ employees, consultants and sub-contractors.

Suppliers shall monitor their compliance with this Code on an ongoing basis. If requested, Suppliers shall provide EFG with relevant information and data to verify this compliance. Failure to comply with the standards and provisions set out in this Code may result in EFG reviewing and potentially ending our co-operation with a Supplier.

1. Complying with applicable laws

We are committed to conducting our business in full compliance with all applicable laws and regulations. We expect the same commitment from our Suppliers. Stricter rules than those described in this Code may be in place in certain countries or business areas. Where multiple rules address the same subject, and do not conflict with each other, the highest standard shall be applied.

2. Committing to our people and our world

We expect our Suppliers to respect internationally recognised principles relating to human and labour rights, and to conduct business in ways that protect the environment.

2.1 Diversity, equality and non-discrimination

Suppliers shall recognise and be committed to upholding the human rights of workers and treat them with the dignity and respect indicated by internationally recognised principles.

Suppliers shall have fair hiring and employment practices to ensure there is no discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status. In addition, workers or potential workers shall not be subjected to any medical or pregnancy tests that could be used in a discriminatory way. There is to be no harsh or inhumane treatment, including sexual harassment or abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers, nor is any such treatment to be threatened.

2.2 Working conditions

Forced, bonded or indentured labour, human trafficking or involuntary prison labour is not to be used. All work shall be voluntary, and workers shall be free to leave upon reasonable notice.

Child labour is not tolerated. The term "child" refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education or the minimum age for employment in the country. Workers under the age of 18 shall not perform hazardous work and may be restricted from night work out of consideration for their educational needs. The use of legitimate workplace apprenticeship programmes and internships that comply with all applicable laws and regulations is supported.

EFG respects and supports children's rights and expects all Suppliers to do the same. Suppliers must have a good understanding of child protection and must have in place working practices that protect the welfare of children.

Working weeks are not to exceed the maximum hours set by local law. Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime and legally mandated benefits. Any disciplinary wage deductions are to conform to local law.

Suppliers are to respect the right of workers to associate fairly and to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment. Workers' rights to join labour unions, seek representation and join workers' councils in accordance with local laws shall be acknowledged. Suppliers shall not penalise workers for lawful participation in labour organisation activities.

2.3 Health and safety

Suppliers shall ensure that workers are provided with a healthy and safe working environment in accordance with internationally recognised standards. Suppliers shall do their utmost to control hazards and take necessary precautionary measures against accidents and occupational risks. Suppliers shall ensure that workers receive adequate and regular health and safety training and education.

Suppliers must have clear procedures in place to ensure that emergency situations are dealt with in a way that minimises harm to life, environment and property.

2.4 Environment

Suppliers shall conduct business in ways that protect and preserve the environment. EFG encourages Suppliers to take a precautionary approach towards environmental challenges, and to undertake initiatives to promote greater environmental responsibility and the development of environmentally friendly technologies.

EFG particularly encourages Suppliers to minimise their environmental impact and to improve their environmental performance on a continuous basis.

3. Protecting data and information

We expect our Suppliers to respect the right to privacy, and to handle personal data and confidential information responsibly.

Suppliers shall respect every individual's right to privacy. This includes complying with all applicable data protection laws and regulations when personal data and information are collected, stored, processed or transferred. We also expect our Suppliers to protect confidential information from unauthorised disclosure or misuse.

4. Fair business practices

We expect our Suppliers never to compromise on ethics when doing business.

4.1 Bribery and corruption

Suppliers shall ensure that they, or any associated persons, do not engage in any form of bribery or corruption in relation to EFG's business. Suppliers shall not, either directly or indirectly, offer gifts to EFG employees or representatives, or to anyone closely related to these parties. Hospitality, such as social events, meals or entertainment, may be offered in order to develop business relationships. However, this hospitality must be reasonable and proportionate to the circumstances, and the cost should be kept within appropriate limits.

EFG encourages all Suppliers to implement and maintain an anti-corruption programme aligned with internationally recognised standards. This program shall be transparent, include adequate training and information, and be efficiently maintained.

4.2 Conflicts of interest

EFG avoids and eliminates conflicts of interest. We expect our Suppliers to inform us immediately if a situation arises which appears to involve a conflict of interest affecting EFG.

4.3 Fair competition

EFG believes in vigorous and fair competition and supports the development of appropriate competition laws. We expect our Suppliers to commit to the same. Suppliers shall not enter into any agreements (written or oral), or engage in other forms of activities, which prevent or restrict competition and breach applicable competition laws.

4.4 International business

EFG respects international sanctions that may be imposed on countries, entities or individuals, either multilaterally or unilaterally. We expect our Suppliers to do the same.

Asking questions and reporting concerns

EFG encourages our Suppliers to ask questions regarding any matter related to this Code, and to report any ethical concerns or suspected cases of non-compliance with this Code.

Suppliers can contact their local contact or legal department. If the local contacts cannot help please contact EFG's Legal (legal@efg.gg) or HR (hr@efg.gg) departments.