



Global Third Party Code of Conduct

February 2026

aberdeenplc.com

Doing the right thing

Our purpose is clear: we enable our clients to be better investors. To do this well, trust must be the foundation of every relationship – whether with clients, colleagues, partners, or regulators. Trust is earned, not assumed, and it's our responsibility to uphold the highest standards in all we do.

This global code is more than a policy – it's a statement of who we are and what we stand for. It sets out the standards that guide our decisions and the responsibilities we hold to our clients, to each other, and to the communities we serve. It's how we ensure we always put clients first, and act with fairness, honesty, and integrity.

We are committed to a culture where everyone feels safe to speak up. Transparency, feedback, and honest conversations are essential to maintaining trust and making sound decisions. Every colleague, in every role, is empowered to protect our values and our reputation.

Thank you to all our colleagues for living by these standards, and for your commitment to delivering the best outcomes for our clients and customers, every day.

Jason Windsor

Chief Executive Officer



Complying with this Code

The Code applies to all third parties and their affiliates and subcontractors ('third parties'), which provide goods or services to Aberdeen Group plc and / or any of its subsidiaries ('Aberdeen'). The terms of this Code are in addition to any other commercial or contractual terms or obligations agreed.

This Code outlines the minimum conduct standards that we expect third parties to follow when doing business with us, and we expect third parties to be able to demonstrate that they are adhering to this Code if we request this.

We acknowledge that no code can address every situation that third parties may encounter. As a result, the Code is not a substitute for third parties' own accountability and responsibility to exercise good judgment and proper business conduct.

We take adherence to this Code seriously; however, we recognise that some smaller businesses may have concerns about meeting all or part of it. We are open to discussions with those businesses and would encourage them to engage with us.

We encourage you to report transparently on all the elements included in the Code in your external publications.



Acting with integrity

We all have a basic responsibility to comply with relevant laws, regulations and policies. Acting with integrity is a higher standard. It requires us all to think about every action we take – before we take it – to ensure we are acting in the best interests of our stakeholders.

Regulations and legislation

We expect you to comply with all laws applicable to your business in the countries in which you operate, and to seek similar commitments across your own supply chains.

In any legal agreement we enter with a third party, we will seek to include appropriate legal obligations to meet this commitment.

Using information responsibly

It's your responsibility to protect the information you process on our behalf for the service(s) agreed – including personal information of Aberdeen employees, clients and customers, as well as any corporate information or information deemed to be Aberdeen's intellectual property.

When working with us, we require you to:

- process any personal information in line with applicable privacy & data protection laws and meet industry standards for information security.
- ensure that appropriate technical and organisational measures are in place to safeguard Aberdeen's information to prevent accidental or deliberate loss, destruction or access to this data by unauthorised parties.
- implement any additional measures (including a data transfer impact assessment) where required to protect personal data if this is to be transferred to a restricted country – we will agree this with you in the contractual agreement for the provision of the service you provide.
- inform your Aberdeen contact promptly, and in line with the agreed contractual terms, if there is any potential or actual breach of our information.

When using Artificial Intelligence (AI) or automated tools, we require you to:

- ensure all data processing aligns with Aberdeen's privacy, security, and contractual requirements. Do not use AI to process Aberdeen data unless appropriate safeguards are in place.
- act transparently and ethically – avoid bias, respect intellectual property, and ensure outputs support the best interests of our stakeholders.

Social media

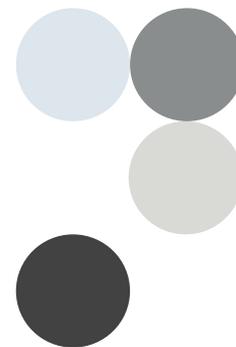
We expect you to act responsibly whenever you are using social media platforms. Engaging in disrespectful, unprofessional, harassing, defamatory, discriminatory or prohibited activity can damage your reputation and the relationship you have with our business.

We don't permit third parties to speak on our behalf on social media, or to represent themselves as our business. Unless we authorise you to do so, you should also avoid representing any views, communications or messaging developed by our business as your own.

Conflicts of interest

A conflict of interest is any situation where the interests of a company, or of its people, are in competition with those of a client or customer, and which leads to a risk that a client or customer may be adversely affected. Conflicts of interest can also happen when an employee's own interests interfere or conflict with their loyalty to their employer. We expect you to:

- have procedures in place to identify actual and potential conflicts of interest you might have with Aberdeen or our clients and customers.
- disclose to us any actual or potential conflicts of interest so that they can be dealt with appropriately.



Anti-competitive behaviour

We expect you to avoid practices that may be viewed as anti-competitive – for example, sharing confidential or commercially sensitive information with competitors of Aberdeen or other third parties.

Anti-bribery, corruption and fraud

Third parties must adopt a zero tolerance approach to bribery, corruption and fraud in any form. At a minimum, this requires full compliance with the Foreign Corrupt Practices Act, UK Bribery Act 2010, Fraud Act 2006, Economic Crime and Corporate Transparency Act 2023 – including the “failure to prevent fraud” offence, and all other applicable laws, regulations and industry standards in the countries in which you operate. If you have any concerns in relation to bribery, corruption and fraud you must report these to your Aberdeen contact immediately, or through your own company’s whistleblowing hotline. You can also raise concerns confidentially through Aberdeen’s Speak Up service (see page 7).

Financial sanctions and export controls

It’s vital that you always comply with all relevant financial sanctions’ programmes and export control regimes, across all the countries in which you operate – and avoid doing anything that might put our business at risk of breaching these.

Tax evasion

Tax evasion is the act of intentionally underpaying tax or diverting funds from public revenues. This is a criminal offence and can be committed at an individual or corporate level. It is also an offence to facilitate another party’s actions in evading tax.

This means that we require you to:

- take a zero tolerance approach to tax evasion in any form – and, at a minimum, comply with the Criminal Finances Act 2017, the Economic Crime and Corporate Transparency Act 2023 and all applicable laws, regulations and industry standards in the countries in which you operate.
- immediately report any concerns to your Aberdeen contact, through your own company’s whistleblowing hotline, or through our Speak Up service.

Gifts and entertainment

You should have appropriate controls in place so that any gifts and entertainment you provide to Aberdeen staff are not bribes or perceived to be bribes.

We exercise care when offering or accepting gifts or entertainment from any third party. We don’t allow our employees to give or receive entertainment or gifts that are excessive or inappropriate in value. They can only offer or accept gifts of modest value and are required to record these in our gifts and entertainment register.



Working with others

How we treat each other reflects on us individually and as a business. We are committed to creating an open, safe and supportive working environment and expect all our employees and third parties to behave professionally.

Our staff

We are committed to maintaining a respectful and inclusive workplace. Any form of unfair treatment, discrimination, harassment (including sexual harassment), victimisation, or other inappropriate behaviour towards our staff is strictly prohibited.

If a third party employee engages in conduct that violates these principles towards any Aberdeen staff member (including employees and contracted personnel), we will take decisive and appropriate action.

Upholding labour and human rights

We are committed to upholding labour and human rights. All our staff receive fair wages and stable contracted hours, supported by our Living Wage and Living Hours UK certification.

Third parties must uphold the core International Labour Organisation (ILO) standards and ensure their supply chains (including affiliates and subcontractors) meet these requirements:

- freedom of association and the right to collective bargaining.
- elimination of forced or bonded labour, including modern slavery.
- effective abolition of child labour.
- elimination of discrimination in employment and occupation, including for migrant or temporary workers.
- provision of a safe and healthy working environment.

We expect you to:

- respect the human rights of your employees, complying with all applicable laws and regulations, (such as the UK Modern Slavery Act 2015 where relevant).
- ensure all employees have a valid legal right to work in the country where they perform their duties.





- prohibit recruitment fees and uphold the 'employer pays' principle – no worker should pay for a job.
- provide fair wages:
 - where living wage standards apply, you must comply; where they do not, ensure wages meet local benchmarks or have a clear plan to achieve this, with regular reviews.
- issue contracts that accurately reflect hours worked and provide reasonable notice for shifts.
- promote transparency in employment practices and supply chain operations.
- report any concerns or breaches related to labour and human rights promptly through our designated channels, refer to Aberdeen's Speak Up service (see page 7).

We expect full commitment to preventing modern slavery and forced labour. If any instance or adverse human rights impact is identified, you must report it to Aberdeen immediately and participate in appropriate remediation efforts where you have caused or contributed to these impacts. Transparency throughout this process is essential.

Enabling diversity, equity, and inclusion

Diversity in all forms, paired with a culture of inclusion, is at the core of our business. It helps us address society's concerns and helps our colleagues feel valued for who they are. It's also vital when working with clients and customers who face increasingly complex challenges. Inclusive procurement is an important part of this.

We expect you to:

- comply with all relevant legislation in the countries in which you operate.
- protect employees from discrimination on the grounds of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex or sexual orientation.
- provide a workplace which does not tolerate harassment, bullying, intimidation or offensive behaviour in any form.
- have a considered and relevant approach which values and respects diversity, equity and inclusion.

Supporting small and medium-sized enterprises (SMEs), Minority owned businesses and Third sector organisations

We are committed to building a diverse supply base and we encourage Minority owned businesses (at least 51% minority owned), SMEs (less than 250 employees and turnover of less than £50m or a balance sheet of less than £43m) and Third sector organisations (NGOs, Charities, Social Enterprises) to engage with Aberdeen for the supply of goods and services. If your organisation identifies as one or more of these then Aberdeen is willing to support you during the onboarding phase and throughout the delivery of the product or service you provide. We encourage you to align with the requirements outlined in this Code.

Supporting communities

At Aberdeen we recognise the important impact corporate funding and volunteering has on local communities, enabling them to positively impact the lives of those they support and their local environment. We encourage you to support charitable causes and social enterprises in the communities in which you operate.





Protecting our environment

We are committed to minimising the impact of our business operations on the environment. We aim to achieve this by reducing our energy and resource consumption and making responsible procurement decisions. The goods or services procured from third parties contributes to our indirect environmental impact through the emissions associated with their business activities, and in some instances their consumption of nature derived products. Therefore, we recognise that you have a significant role to play in helping us to reduce our impact.

We expect you to:

- comply with all environmental legislation and regulations applicable to your organisations.
- maintain a written environmental policy and effective internal environmental management system or framework.
- have in place science aligned greenhouse gas emission reduction targets.
- have established emission monitoring covering emission scopes 1, 2, & 3 and be willing to share this information on request.

Health and safety

We are committed to improving not just our own health and safety performance, but also that of our third parties and of others who undertake work on our behalf.

We expect you to provide a safe and healthy work environment, both on your own premises and when contracting on our sites.

Better environmental, social, and governance (ESG) transparency

As part of Aberdeen's commitment to understanding and reducing the sustainability risks associated with third party activities, we work closely with our partners to minimise their impact. We have partnered with EcoVadis – a leading third party sustainability rating platform. We encourage you to join EcoVadis, if you are not already registered, to assist us with our ESG aspirations.

Read and download related reports and policies on the aberdeenplc.com website

Speak Up

If you have any concerns about actions or decisions made that go against the principles and standards set out in this Code, then please inform your contact at Aberdeen.

Our independent and confidential Speak Up service, provided by Safecall, is available 24/7 in multiple languages. Stay anonymous by using Safecall's website or phoneline. Safecall will not disclose your identity without permission.

 UK Speak Up line: **0800 915 1571**

 Global online reporting: www.safecall.co.uk/report



For more information visit [aberdeenplc.com](https://www.aberdeenplc.com)

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