



Global Third Party Code of Conduct

March 2025

[aberdeenplc.com](https://www.aberdeenplc.com)

Doing the right thing

Our purpose is clear: enabling clients to be better investors. To fulfil this, we must ensure that trust forms the foundation of the relationships we build with all our stakeholders across the world – clients, colleagues, and partners. We are proud of the relationships we hold with our business partners and suppliers across the organisation. Working together, and upholding the highest standards enables us to deliver better outcomes for our clients, and for our colleagues, both today and in the future.

Our Global Third Party Code of Conduct ('Code') is not just a document – it reflects our culture, our commitments, and the behaviours we expect from everyone within our organisation, and from the partners and suppliers we work with. As we strive to deliver the very best service to our customers and clients, this Code sets out the principles we require all our third parties to follow when they do business with us, and which we expect them to demand from their own supply chains. It covers everything from applicable laws and regulation, protecting human rights, providing a safe place for work and environmental responsibilities.

We are proud of the relationships we hold and believe in acting responsibly and paying a fair price for the products and services we consume. By working together and with clear principles across our end-to-end businesses, we can build lasting relationships and achieve more for our clients and the communities in which we operate.

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 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.

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.

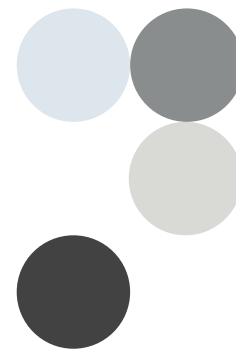
Conflicts of interest

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.



Bribery and corruption

Third parties must take a zero tolerance approach to bribery and corruption in any form. At a minimum, this means complying with the Foreign Corrupt Practices Act, the Bribery Act 2010, the Economic Crime and Corporate Transparency Act 2023 – including the “failure to prevent fraud” offence, and all applicable laws, regulations and industry standards in the countries in which you operate. If you have any concerns in relation to bribery and corruption, you should 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 and all applicable laws, regulations and industry standards in the countries in which you operate.
- immediately report any concerns to your Aberdeen contact, through their 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 do not tolerate any unfair treatment, discrimination or harassment (direct, indirect, harassment (including sexual harassment), victimisation or any other form of discrimination) directed towards our staff. If a third party member of staff is found to have acted inappropriately towards an Aberdeen staff member (which includes all our employees and contracted staff) we will take robust action.

Upholding labour and human rights

We take our responsibility seriously to uphold labour and human rights for all Aberdeen staff. We ensure our staff are paid a fair and equitable wage and given stable contracted hours. Our commitment to this is demonstrated by our Living Wage and the Living Hours UK certification.

We expect you to:

- respect the human rights of your employees and comply with all legislation, regulations and directives applicable to your organisation, including the UK 2015 Modern Slavery Act where businesses are captured by the legislation.
- discourage/prohibit the practice of worker recruitment fees and support the 'employer pays' principle, that no worker should have to pay for a job.
- only employ people with a legal right to work in the country they work in.
- provide your employees with a fair and equitable wage – if the places you provide services to Aberdeen from have living wage accreditation or legislation, we expect you to adhere to this. In the absence of such accreditation or legislation, we expect you to ensure all employees receive a wage that meets the local living wage benchmarks where they exist or have a clear implementation plan to achieve this standard, including regular reviews and adjustments to reflect changes in living wage benchmarks.
- ensure a right to a contract that reflects accurate hours worked and provides decent notice periods for shifts.

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We require third parties to uphold the commitments relating to the core International Labour Organisation (ILO) standards highlighted below, and ensure that your own supply chain (including affiliates and subcontractors) meet these minimum standards:

- freedom of association and the effective recognition of the right to collective bargaining.
- the elimination of all forms of bonded labour and compulsory labour including modern slavery.
- the effective abolition of child labour.
- the elimination of discrimination with respect to employment and occupation, including migrant/ temporary labour.
- a safe and healthy working environment.

We expect third parties to be committed fully to preventing modern slavery and forced labour in their own operations and downstream supply chains. Where modern slavery or other adverse human rights impacts are identified, we expect third parties to participate in appropriate remediation efforts where they have caused or contributed to these impacts.

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; 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 sponsorship 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 the sustainability risk associated with third party activities and working with our partners to reduce 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 phonenumber. Safecall will not disclose your identity without permission.

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

 Online reporting: **www.safecall.co.uk/report**



For more information visit aberdeenplc.com

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