



# Fidelity International's Supplier Code of Conduct & Ethics

Setting expectations around our supply chain practices

# Supplier Code of Conduct & Ethics (“Supplier Code”)

This code applies to any third party, organisation or individual that provides Fidelity International (“Fidelity”) with goods or services directly or indirectly (“Suppliers”).

## Overview

Recognising that Suppliers are an extension of our business, we seek partnerships with those who operate with the integrity and high ethical standards that we require to protect our reputation and merit the ongoing trust of our clients and investors.

This document outlines our expectations and provides communication channels for addressing issues. If Suppliers subcontract, we expect them to pass on and monitor these standards.

## Key Updates from the Previous Version

- Condensed and refined text focussing on minimum standards to enhance readability.

## Artificial Intelligence and Generative AI

- Disclosure and Opt-Out Provision:** Suppliers must disclose AI and Generative AI features in their products or services, including the type, purpose and potential impact of AI used and offer opt-out or non-AI alternatives.
- Data Retention and Use:** Suppliers must ensure data is not retained or used for model training without obtaining explicit written consent from Fidelity.
- Transparency and Explainability:** Suppliers should ensure an adequate standard of transparency and explainability in the AI systems, including providing appropriate information about the underlying model and the logic and data used to train the model.
- Oversight and Compliance:** Suppliers must manage their own third-party AI providers to uphold standards of transparency, data protection, and ethics, and are responsible for ensuring AI systems comply with relevant laws and regulations in their operational markets.

## Conflicts of Interest

Fidelity and its Suppliers must identify and disclose any instances of apparent or actual conflicts of interest. This includes disclosure of any dealings with a Fidelity employee or their family member or relative who holds a significant financial interest in the Supplier. Additionally, disclosures are required from the Supplier of any personnel who work closely on the Fidelity account and have a family member or relative working at Fidelity.

Gifts, meals, or entertainment must comply with applicable laws and policies and align with local custom to avoid conflicts, or perceived conflicts of interest.

No items of value or cash equivalent / monetary value item should be given where it could be perceived to influence Fidelity business decisions. Fidelity employees are expressly prohibited from accepting gifts and entertainment when there is a current or potential sales pitch, tender or bid process, or an active opportunity with Fidelity.

## Diversity, Equity, and Inclusion

Fidelity has a long-standing commitment to diversity, equity, and inclusion (DEI), actively supporting campaigns and initiatives which challenge organisations to do more including: the Women in Finance Charter, the Race at Work Charter, the Valuable 500 Initiative, the UN LGBTI Standards of Conduct in Business, and the Global Business Collaboration Leadership Pledge for better workplace mental health. Our Suppliers are expected to uphold similar values of:

- **Workplace inclusion:** Implementing a DEI approach to foster an inclusive culture, promoting a working environment that is free from discrimination on any grounds, including but not limited to age, caring responsibilities, disability or long-term health condition (physical or mental), gender identity, expression or reassignment, intersex status, marital or family status (including civil partnership), pregnancy or maternity, national or ethnic origin (race, colour, descent, membership of the Traveller community), religion or belief, sex, sexual orientation and socio-economic background.
- **Inclusive supply chain:** Fostering inclusive procurement activities.
- **Accessibility and support for vulnerable customers:** Providing products and services which meet internationally recognised standards of accessibility for people with disabilities and providing any additional support required for vulnerable customers.

## Environmental Management

Fidelity expects its Suppliers to share its commitment to protecting the environment and responding to challenges posed by climate change by:

- Understanding and managing environmental sustainability-related risks, impacts and practices of their operations and their supply chain.
- Reducing negative social and environmental impacts wherever possible.
- Measuring and sharing carbon emissions associated with goods and services delivered to Fidelity.
- Collaborating with us to help us reduce their environmental impacts and ours.

## Financial Crime

Fidelity has zero tolerance for being a party to or being used as a vehicle for financial crime.

Suppliers must not give or receive bribes or accept improper payments to obtain new business, retain existing business, or secure any improper advantage or permit 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.

Suppliers must comply with all applicable financial crime related (anti-bribery and corruption, anti-money-laundering, terrorist financing, and international sanctions) laws and regulations in all relevant jurisdictions including implementing relevant policies and procedures and maintaining accurate accounting records.

Fidelity expects Suppliers to inform us, as soon as possible, either through their business relationship manager or if more appropriate our whistleblowing hotline, of any suspicions about bribery and corruption as well as any other significant financial crime related breaches particularly regarding international sanctions, that might impact Fidelity.

## Labour and Human Rights

Fidelity is committed to upholding fundamental human rights across its operations, investments, and relationships with employees, clients, suppliers, and communities. Fidelity expects Suppliers to share this commitment and adhere to key principles, including:

- **Health & Safety:** Provide a safe and hygienic workplace that minimises risks and supports accident prevention.
- **Freely Chosen Employment:** Prohibit the use of forced labour in any form.
- **Avoidance of Child Labour:** Comply with laws regarding minimum working age, prohibiting the employment of anyone under the legal minimum age.
- **Working Hours:** Ensure working hours comply with local laws and are not excessive.
- **Wages & Benefits:** Provide timely compensation and fair wages, meeting or exceeding local minimum wage standards. Overtime should be voluntary and appropriately compensated, except as required under the local labour laws.
- **Freedom of Association:** Respect workers' rights to organise and bargain collectively and support alternative consultation methods if legally restricted.
- **Avoidance of Discrimination:** Promote a workplace free from discrimination, harassment, victimisation, or abuse on any grounds.

## Monitoring and Oversight

Suppliers are encouraged to evaluate their operations and supply chain to ensure adherence to the principles and codes outlined above and to conduct audits of their supply chain when requested by Fidelity. Any non-compliance by the Suppliers or their supply chain must be effectively remedied both in a timely manner and at no additional cost to Fidelity or our customers. Suppliers are expected to have controls and processes in place which are designed to adhere to and observe standards of market conduct and requirements, protect our customer information, assets, and reputation.

**Breaches of this Code may negatively impact their business relationship with Fidelity.**

## Protection of Assets and Data

Suppliers are expected to use and share Fidelity and client assets only when appropriately authorised to do so and to protect all personal information in accordance with our [Supplier Privacy Policy](#).

All uses of data, such as collection, processing, transfer, deletion, and storage, must take place in accordance with applicable laws and regulations.

Suppliers must never forward Fidelity information to a non-approved external email address for any non-business purpose.

Suppliers must not engage in any advertising, marketing, press release or promotional activities that reference Fidelity or its logo, products, or services in any manner.

## Raising a Concern

Fidelity believes that a strong ethical culture depends upon operating an open environment in which staff and external parties feel free to report concerns without fear of recrimination.

Suppliers, including their employees and supply chains, are encouraged to report suspected or known misconduct that exposes Fidelity to reputational, ethical, legal, or regulatory risk. This can be done by speaking with the relevant Fidelity relationship manager or through our Confidential ALert Line (CALL) at <https://secure.ethicspoint.eu/domain/media/en/gui/107150/index.html>. We are committed to investigating these reports and taking appropriate action based on our findings.

CALL is a discreet online and free-phone service that is managed by a third-party supplier. All communications are handled in-house by this supplier and are available 24/7 in international languages.

### No retaliation

Fidelity does not retaliate against anyone for submitting in good faith a report of suspected or known misconduct, nor do we tolerate others retaliating. Similarly, Suppliers 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.