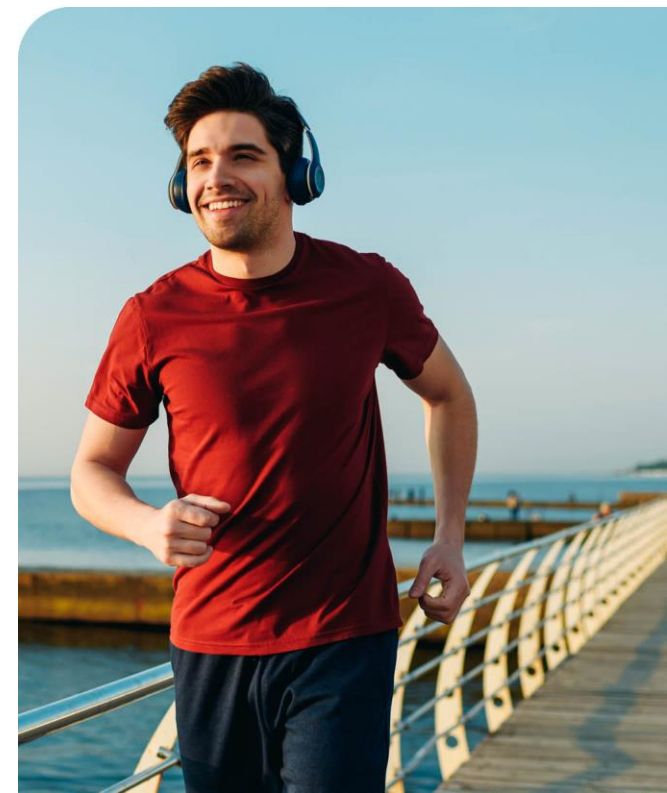




# Code of Supplier **Responsibility**

Supplier Code of Conduct - Santander UK plc



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# Foreword

To tackle the material challenges that we face as a society, businesses of all shapes and sizes will need to embrace more responsible practices to make meaningful differences to the communities we operate within and impact. To ensure this responsibility runs throughout our own business and is a positive influence on others, we actively seek to partner with suppliers who share these values most closely, and reflect this throughout their entire value chain.

Our Santander UK Sustainable and Responsible Banking Strategy consists of three pillars: Environment, Social, and Governance. We guide our employees using this framework, underpinned by guiding principles and targets. In updating this 'Code', I want to ensure this is clearly communicated to you, both as a supplier and as an intrinsic part of our business. For us, having a clear strategy supports our vision of helping people and business prosper and enables us to identify and respond to our most important, or material, sustainability issues.

This Code of Supplier Responsibility both outlines our Strategy and ambition for being a responsible bank; to help you understand our priorities, as well as detailing the specific expectations of our supplier partners. Alongside this we want to share how we will support you, and our commitment to continue to improve the outcomes for our customers and the communities we work within, together.

We know that every organisation is on a different path when it comes to implementing responsible business practices, that's why we have outlined both "what we expect" (the minimum standards) and "what we encourage" (practices we encourage our supplier partners to commit to or work towards). We encourage you to reflect on your own responsible business plan, and how you can align with our standards and ambition, to maximise the positive impact you can have on all of your stakeholders.

We recognise that serving our customers is only possible through our supplier partnerships, and I thank you for the efforts you deliver daily to make our customers' 'better' happen. Working with our suppliers in the right, responsible way means providing our customers with the very best we can offer and driving benefit into the wider community and economy.

This Code reflects our latest commitments as a business and expectations of our suppliers. Thank you for your commitment to this, and I look forward to working with you to serve our customers and help people and businesses prosper responsibly.

**Jarrold Glover**  
Chief Procurement Officer UK

Working  
together to help  
business and  
people prosper  
**responsibly**





# Our Values: Simple, Personal and Fair

We follow **The Santander Way**

### Our aim

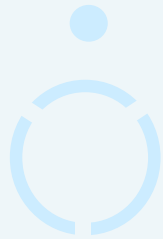
To be the best open financial services platform, by acting responsibly and earning the lasting loyalty of our people, customers, shareholders and communities

### Our purpose

To help people and businesses prosper

### Our how

Everything we do should be Simple, Personal and Fair



## Our commitment to our Customers, People, Shareholders and Communities

At Santander we're driven by our purpose to help people and businesses prosper.

We are a large customer-focused bank who play an important role in the UK economy and our communities. We help people to purchase their home, save for the future and support their business growth through our digital channels, network of branches and corporate business centres.

We are committed to delivering outstanding experience by following **The Santander Way** living our values of **Simple, Personal and Fair**.

Our aim is to be the best open financial services platform by acting responsibly and earning the lasting loyalty of our people, customers, shareholders and communities.

Our Sustainable and Responsible Banking (SRB) strategy enables our values of Simple, Personal and Fair. We aim to:

- Contribute towards Group ambitions to be net zero carbon by 2050 and meet regulatory requirements.
- Support productive inclusive growth across our key stakeholder groups: Customers, Communities and Our People.
- We will aim to be responsible in everything we do with ethics and integrity being a solid foundation of our SRB strategy.

By living these values, we believe we will create value for all.



# Our Sustainability and Responsible Banking Commitments

Being a **responsible business** is a key priority and part of our **core strategy**. Our Sustainability and Responsible Banking (SRB) Strategy sets out our ambition in this area. It supports our vision of helping people and business prosper and responds to our most important, or material, sustainability issues. It consists of three pillars: **Environment**, **Social**, and **Governance**.

To learn more about our ESG commitments, please see our latest [ESG supplement](#).

## Environment

### Aim:

Contribute towards Group ambitions to be net zero carbon by 2050 and meet regulatory requirements.

### Strategic pillars:

1. Aligning our portfolios to meet the Paris Agreement goals
2. Supporting our customers in the green transition
3. Reducing our environmental impact
4. Embedding climate in risk management

### Material topics:

- Climate change
- Green finance
- Biodiversity and land use management
- Pollution and waste management

### UN SDGs:



## Social

### Aim:

Support productive inclusive growth across our key stakeholder groups: Customers, Communities and Our People.

### Strategic pillars:

1. Customers: Making their better happen
2. Communities: Better Communities
3. Our People: Thriving Workplace

### Material topics:

- Diversity, inclusion and employee wellbeing
- Talent and performance management
- Affordable housing
- Financial health
- Financial inclusion and empowerment
- Community engagement and support
- Human and labour rights

### UN SDGs:



## Governance

### Aim:

We will aim to be responsible in everything we do with ethics and integrity being a solid foundation of our SRB strategy.

### Material topics:

- Innovation and digitalisation
- Reputation as a responsible bank
- Ethics and compliance
- Organisational culture and governance
- Privacy, data protection and cybersecurity
- Responsible supply chain and procurement

### UN SDGs:



## What you need to do

Your agreement to this Code of Supplier Responsibility is a key condition of doing business together.

Our preferred supplier partners are those who embrace these commitments and continually strive to help us be the easiest way to make our customers' better happen.

### Supplier Definition

We define a supplier as any third-party organisation, and their affiliates (including agencies, intermediaries, and our customers) that provides goods or services to Santander UK. This includes potential suppliers seeking to work with Santander UK.

The core commitments of the Code of Supplier Responsibility are outlined in pages 6 to 10 of this document.

The Code of Supplier Responsibility applies to all suppliers.

### What we expect:

- Read and reflect on our Code of Supplier Responsibility (in particular consider how you meet these expected standards and behaviours).
- Communicate this Code of Supplier Responsibility to your employees, parent company, subsidiaries, and subcontractors.
- Understand that this document is intended to complement our contracts with suppliers and the rules we set out when we procure our goods and services, which will always take precedence.
- Recognise that non-compliance with this Code may adversely affect your commercial relationships with Santander UK and may also constitute a contractual breach where directly related to established contractual provisions.
- Confirm agreement with this Code of Supplier Responsibility when you submit a proposal to perform a service for Santander UK or if you are asked to complete our supplier qualification process.

### What we encourage:

- If in doubt regarding any of the content of this Code, please speak with your Service Manager, your primary Santander UK contact.

## Speaking up

**Suppliers should feel able to raise concerns about actions or decisions that breach the standards set out in this Code without fear of victimisation. In the first instance, concerns can be raised via your Santander UK Service Manager.**

Alternatively, please contact Navex Global, an independent organisation who operate a telephone and secure web-based service reporting tool called EthicsPoint.

**Call: 0800 0698792**

**Online: [www.santanderuk.ethicspoint.com](http://www.santanderuk.ethicspoint.com).**

You can also report concerns over wrongdoing or misconduct involving Santander UK employees or contractors by contacting the Santander UK Whistleblowing Team:

[whistleblowingteam@santander.co.uk](mailto:whistleblowingteam@santander.co.uk)

Santander UK will take all whistleblowing concerns received seriously and, where appropriate and proportionate, investigate further. A whistleblower's confidentiality will be respected, and a whistleblower will not be treated any differently for raising a concern.

If you prefer, you can raise concerns with our regulators, the Financial Conduct Authority or the Prudential Regulation Authority.

## Environmental Sustainability

We are committed to becoming a more sustainable organisation and supporting the UK's transition to a **net-zero economy by 2050**. We encourage and rely upon our suppliers to join us in that commitment by developing internal programs designed to foster a culture of sustainability across their own operations and supply chain.

### What we expect:

- Be aware of, and support us in, complying with all relevant environmental legislation and work with us to achieve the aims of our Environmental Policy.
- Have a documented environmental policy, statement, or program to mitigate environmental risks, the implementation of which should be evident throughout all levels of the company.
- Have processes in place to ensure that your operations conform to all applicable environmental legislation. All required environmental permits, approvals and registrations are to be obtained, maintained, and complied with in accordance with the conditions and requirements defined therein.
- Understand the environments you operate in and actively seek to measure and reduce any potentially harmful impacts from your operations.

### What we encourage:

- Have a commitment to reach net zero emissions by 2050 (or sooner) and actively work towards interim Science Based Targets.
- Work towards disclosing scope 1, 2 and 3 greenhouse gas emissions and broader improved ESG performance.
- Make practical efforts to eliminate or reduce levels of generated waste, reusing and recycling waste materials wherever possible. The handling, storage, movement, treatment, and disposal of all waste to be carried out in accordance with applicable regulations and in an environmentally responsible manner.

## Santander UK's climate strategy

Meet regulatory requirements and contribute towards Banco Santander's ambition to be net zero by 2050

Aligning portfolios to meet Paris Agreement goals	Supporting our customers in the green transition	Reducing our environmental impact	Embedding climate in risk management	
Decarbonize portfolios to contribute to limiting global temperature increase to 1.5°C	Help our customers transition to a low-carbon economy	Become net zero in our own operational footprint	Integrate climate-related risks and adhere to regulatory and supervisory expectations	
Interim targets but calling out our dependencies	Green finance targets with focus on building decarbonization	Net zero in our own operations by 2030	Climate as a principal risk and meet all regulatory requirements	
Data and systems	Communication and disclosures	Partnerships	Policy engagement	People and skills

- Consider the environmental credentials and performance of suppliers within your own supply chain and require them to operate to a minimum set of standards.
- Provide a credible ESG scorecard from a reputable third party, for example EcoVadis.



## Human Rights

We expect all suppliers to respect the human rights of your **own workforce**, your **supply chain**, and your **customers**. This includes complying with the provisions of the **Modern Slavery Act 2015**.

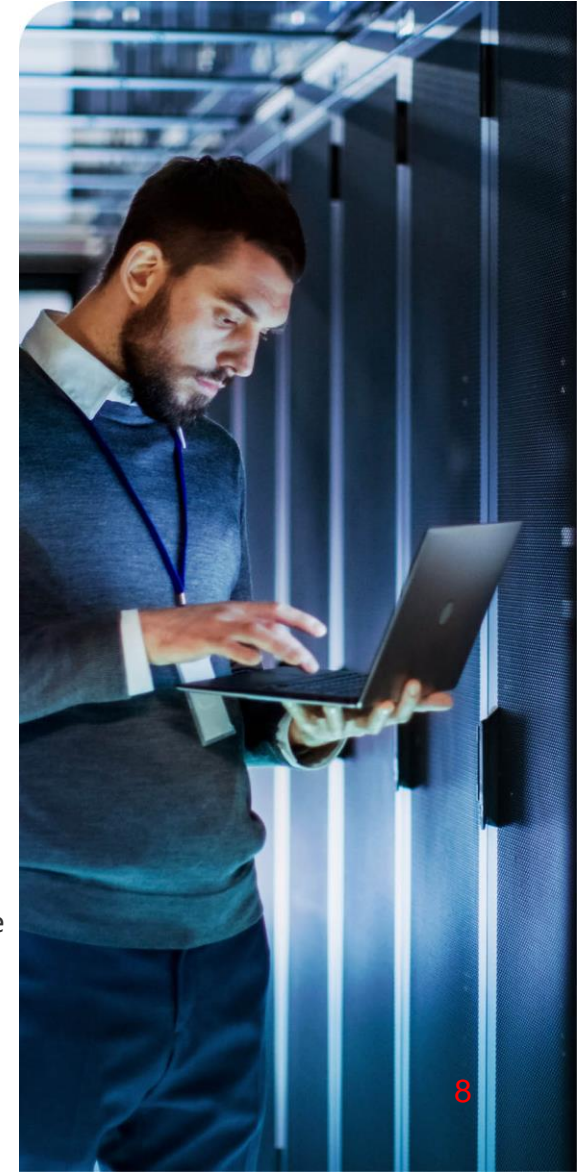
### What we expect:

- Respect the human rights of your employees and to comply with all relevant legislation, regulations, and directives, including awareness and mitigation of the risk of modern slavery in the countries and communities in which you operate and, where relevant, compliance with the UK Modern Slavery Act.
- Have robust means of ensuring that the subcontractors in your supply chain also comply with the Modern Slavery Act 2015.
- Prohibit forced labour (slavery) and human trafficking in your supply chain and give all employees the right and ability to leave employment if they choose.
- Prohibit child labour. Child labour is defined as work that 'deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development'. This includes (i) any child below the minimum working age engaged in non-light work, and (ii) juvenile workers engaged in hazardous work.
- Ensure that wages meet the legally mandated minimum without unauthorised deductions.
- Allow your employees to legally organise and join associations (such as labour unions).
- Ensure working hours are in accordance with local regulation and industry practice and voluntary overtime is at a manageable level.
- Treat all employees fairly and do not harass or

- discriminate against any group in your employment practices, based on gender, race, age, sexual orientation, gender identity, disability, faith, or family circumstances.
- Ensure there are no negative consequences for anyone who raises a concern.
- Champion your workforce and customers' health, safety, and wellbeing.

### What we encourage:

- Achieve higher standards than the minimum set out in the Equality Act 2010.
- Ensure a zero tolerance of harassment and bullying, driving inclusion and increasing diversity overall; monitor incidents of bullying and harassment.
- Present diverse colleagues and teams to work alongside Santander UK.
- Be able to evidence that recruitment practices are accessible to widest possible groups and do not disproportionately affect anyone due to gender, race, ethnic or national origin, age, disability, sexual orientation, gender expression, gender identity and socio-economic background.
- Have diversity training available to the workforce and that uptake is being monitored.
- Collect data to understand the profile of the workforce and have measures to improve diversity.





## Social Responsibility

Santander UK has a firm commitment to **enable equality of opportunity** and workplace cultures that promote workplace diversity and inclusion as outlined by the Santander UK **Diversity and Inclusion strategy**.

Santander UK aspires to be a leading body in corporate social responsibility, going above and beyond standard legal requirements.

### Diversity and Inclusion

#### What we expect:

- Actively demonstrate commitment to equality, diversity, and inclusion through all aspects of workplace operations and management considering equality of opportunity in employment, skill development and career advancement, particularly with under-represented segments of society in local operations.

#### What we encourage:

- Have a documented Diversity and Inclusion statement or set of statements within your Policy framework.
- Suppliers to support our diversity and inclusion efforts by recruiting, utilising, and developing diverse businesses on Santander UK's work. Diverse businesses are broadly defined as 'size diverse' i.e., small, and medium-sized enterprises where revenue and/or employment eligibility limits are defined locally; or 'ownership diverse' i.e., where socio-economic under-represented segments of society, as defined by local/regional standards, meet ownership, control, and operating standards for minority owned businesses designation. It is our commitment that diverse business enterprises shall have equal opportunity to compete for all goods and services to become preferred suppliers and/or subcontractor(s) for the organisation. Santander UK is committed to the development and growth of diverse business enterprises to build a better working world and expand networks.

- Active promotion of positive mental health at work.
- Suppliers to have a documented mental health and wellbeing strategy.

### Accessibility

#### What we expect:

- Suppliers are to abide by all standards, best practice guidance and regulations related to accessibility including, where applicable, Web Content Accessibility Guidelines (WCAG) v2.2 to minimum AA standard.
- Align with Hassel Inclusion's 5 key principles for digital inclusion and accessibility (or similar): Expand Awareness, Embed Strategy, Enable Process, Measure Effects, Continually Evolve.

#### What we encourage:

- All our suppliers to be committed to utilising, and making available, accessible technologies and products that contribute to the productivity of all employees, including those with disabilities. For the purpose of this Code of Supplier Responsibility, disability is defined as a colleague with a long-term health condition (including mental health and neurodiversity) which has a substantial impact on their day-to-day life.
- To have a documented accessibility statement or reference to accessibility within other policies.
- Accessibility roadmaps, ensuring consistent learning and improvement to create inclusive and accessible products, services and environments.

### Mental Health

#### What we encourage:

## Responsible Business Practices

The **highest standard of integrity** is expected in all our business dealings. All forms of corruption, extortion, bribery (including facilitation payments), and embezzlement are strictly prohibited and may result in immediate **termination** of engagement and **legal action**.

### What we expect:

- Do not offer or provide money, or anything of value, to any person if all or part of it could be used to influence official action or obtain business advantage.
- Understand relevant Santander UK gift and hospitality policies before offering or providing Santander UK personnel with any gift and/or business entertainment. Gifts or entertainment should never be offered to Santander UK personnel or representatives under circumstances of impropriety.
- Comply with all applicable trade control laws and regulations.
- Suppliers will use only subcontractors or other third parties who comply with all applicable laws and regulations, and who adhere to the same (minimum) standards set forth in this guide.
- Ensure that Financial Crime and Fraud Policies & Standards are in place and monitored.
- Where Santander UK data is processed, transmitted, stored, or accessed by our supplier partners, we expect that this is managed and controlled in line with the requirements of the Data Protection Act 2018. Where breaches are identified, we expect these to be brought to our attention immediately.

### What we encourage:

- Use the relevant channels to Speak Up regarding any suggestions of misconduct relating to the business practices of a Santander UK relationship (see page 6 of this Code).
- Ensure the relevant processes and procedures are in place detailing ethical and responsible business approach and governance.
- Establish and commit to a Code of Responsible Business, or similar.





## What we will do

The provisions of this Code of Supplier Responsibility are in addition to and not in lieu of any legal agreement or contract. We reserve **the right to review** your policies, procedures, and supporting documentation related to compliance with this Code and, in some higher risk instances, we may undertake an **on-site assessment** of key suppliers to validate adherence.

To ensure responsible and sustainable supply chain practices, **we commit to:**

- Provide mechanisms for prospective suppliers to be considered for work;
- Treat suppliers fairly with an open tendering process and a clear relationship management process;
- Work closely with our suppliers to collaborate and develop high quality products and services, effectively managing risks;
- Provide clear guidance on our payment procedures and pay invoices in line with agreed terms and in accordance with the Prompt Payment Code;
- Ensuring support for inclusive, accessible, and ethical living supply chain;
- Supporting viable opportunities to reduce environmental and climate impacts and to preserve our planet and natural resources;
- Interact and engage with our suppliers on a regular basis. This ensures maximum benefit for our customers in terms of price, quality, and social impact;
- Reviewing this Code as needed and revising it over time as our approach to responsible sourcing evolves.
- Assign you a service manager who will act as your key day to day point of contact.
- Take any concerns you have with how we operate with you seriously and, where appropriate and proportionate, investigate further.
- Encourage candor and the spirit of the challenge between the organisations, keeping a focus on best customer outcome and holding each other accountable to delivery.

## Useful Resources

You can access more information on how we work with our suppliers online:  
[Suppliers | Santander UK](#)

[Santander UK ESG Supplement 2023](#)

[Standard Terms & Conditions](#)

Corporate Governance:  
[About Santander | Corporate governance](#)

General Enquiries:  
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SAP Ariba / Helios:  
[certification.uk@aquanima.com](mailto:certification.uk@aquanima.com)

Please feel free to contact us.  
We value your feedback.