



# Our Supplier Code of Conduct

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## Introduction

As one of the world's largest financial services institutions, we understand that we need to lead by example in the way we do business. We seek to reinforce our business integrity by striving to improve the service that we provide, making responsible decisions in how we manage the business, and actively managing the social and environmental impacts of what we do to help individuals, communities, businesses and economies progress and grow. Our goal is to drive excellence in these areas throughout our own organisation, and to support and influence positively the development of these areas in our supply chain.

Barclays will always require that our suppliers comply with all applicable laws, regulations and standards within the geographies in which they operate. In instances where standards outlined within this document differ from local laws and customs, we expect suppliers to respect these standards within the context of the customs and the local laws of their specific geography.

The standards outlined in this Supplier Code of Conduct will be periodically updated to reflect changes in laws, regulations and standards. Global reporting standards such as those defined by the Global Reporting Initiative G4 Global Sustainability Reporting Guidelines have informed the current set of guidelines along with other relevant internal and external standards as will be referenced throughout the document.

## Definitions

“Supplier” means any firm or individual that provides a product or service to Barclays or to any of its clients either directly or indirectly.



## 1. Environmental Management

Barclays recognises that the management of environmental impacts is integral to good business practice, as is outlined within the [Barclays Energy & Climate Change Policy Statement](#). To support the reduction in our environmental impacts we have set ambitious targets to 2030. We encourage our suppliers to join us in similar environmental efforts to implement Environmental Management Systems (EMS) as appropriate to their businesses, and align with best practice activities including the following:

- **Minimise harm to the environment**  
Establish operational practices which minimise impact on the environment and deploy measures to prevent and reduce harm to the environment
- **Track performance and report environmental improvements**  
Reduce operational environmental impacts. Impacts could include resource consumption, air emissions (including those contributing to climate change), water consumption, management of hazardous materials, recycling and waste production. Disclose required information and provide to Barclays, as appropriate, data to demonstrate environmental performance.
- **Set environmental targets and commitments**  
Maintain environmental policies, objectives and targets which as a minimum include commitments to identify, measure and reduce significant environmental impacts, identify business risks associated with climate change and align with Barclays' environmental agenda. We ask suppliers to align to our strategic goals and set emissions reductions targets that are long term, embrace the Science Based Target methodology and support the transition to a low carbon economy and resource efficient operations.
- **Report regulatory breach**  
Disclose regulatory breaches and incidents involving the regulator, including outcomes of annual inspections, audit and or notices; together with planned improvement actions to rectify and resolve the breach.

## 2. Human Rights

Barclays supports the protection of human rights around the world. We are guided by fundamental principles such as the International Labour Organisation (ILO) Core Conventions and we comply with all applicable law and regulation, including the UK Modern Slavery Act 2015 and its reporting obligations to publish a slavery and human trafficking statement for financial years ending on or after 31 March 2016. We are committed to operating in accordance with the International Bill of Human Rights (comprising the Universal Declaration of Human Rights (UDHR), the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights). This support is reflected in our policies and actions in the countries in which we do business.

Barclays seeks to support human rights through our supply chain by encouraging behaviours and practices that are consistent with the objectives of the [Barclays Statement on Human Rights](#). We welcome relationships with our suppliers as opportunities to improve and evolve practices with respect to Human Rights. Our supply chain participants are expected to support our commitment to respect human rights through:

- **Occupational Health and Safety**  
Provision of a safe and hygienic working environment through proactive management and controls that minimise health and safety risks and support accident prevention for all personnel, bearing in mind the prevailing knowledge of the industry, the requirements of local health and safety laws and of any specific hazards, wherever personnel perform duties, such as, factories, warehouses, workshops, offices, vehicles, external facilities or other work, dining and recreational spaces. Where delivery of products and services are to be performed on Barclays' premises, a *Supplier Health and Safety Expectations* document is available through your Supplier Relationship Manager.
- **Freely chosen employment**  
Ensuring that all work is completed voluntarily and without slavery, servitude, forced or compulsory labour and human trafficking. Workers shall have the freedom to terminate their employment at any time without penalty, upon giving reasonable notice.
- **Avoidance of child labour**  
Child labour should not be employed. The term 'child' refers to any person less than 15 years of age (or 14 where the law of the country permits), unless the minimum age for work or mandatory schooling is stipulated as being higher by local law, in which case the stipulated higher age applies in that locality.
- **Working hours**  
Ensuring that all workers are entitled to work and be paid for a minimum level of working hours; that working hours are not excessive; and that maximum working hours comply with national laws. All overtime shall be purely voluntary, unless part of a legally recognized collective bargaining agreement. No worker shall be made to work overtime under the threat of penalty, dismissal, denunciation to authorities or as a disciplinary measure.
- **Wages and benefits**  
Being responsible for employee compensation and payment of fair wages. All employees should be paid a fair wage commensurate with prevailing industry conditions or the minimum wage, whichever is higher.

## 2. Human Rights (continued)

- **Employee freedom of association**  
Respecting the rights of workers to exercise freedom of association and collective bargaining. Where the right of freedom of association and collective bargaining is restricted under law, the supplier will not hinder the development of alternative means for informing/consulting with employees.
- **Avoidance of discrimination and harassment**  
Promoting a workplace free from discrimination, harassment (sexual, physical, mental), victimisation, or any other form of inappropriate behaviour or abuse on any grounds (including; but not limited to age, disability, ethnic origin, gender, gender identity, nationality, marital status, parental status, physical appearance, political convictions, pregnancy, race, religious beliefs, sexual orientation, gender identity, social origin or status, economic status, union affiliation or employment status – salaried or hourly, full-time, part-time, seasonal, intern).
- **Grievances**  
Demonstration of formal mechanisms allowing employee grievances regarding human and labour rights violations to be properly filed, addressed and resolved without fear of perceived or actual retaliation. Grievance mechanisms shall be available in employee’s native language and include the ability to report grievances anonymously.
- **Whistleblowing**  
Demonstration of formal mechanisms allowing employees to raise concerns of operational or business practices that violate laws, regulations or company values and for the concerns to be properly filed, addressed and resolved without the fear of retaliation.



### 3. Diversity and Inclusion

Barclays has a firm commitment to enable equality of opportunity and workplace cultures that promote workplace diversity and inclusion as outlined by the [Barclays Diversity and Inclusion](#) strategy and supply chain diversity and inclusion as outlined by the [Barclays Supplier Diversity & Inclusion](#) strategy. We not only meet the basic legal requirements in every jurisdiction we operate in, but seek to lead the way in this area. We encourage our suppliers to partner with us to achieve excellence in equality, diversity and inclusion through:

- **Workplace Inclusion and development**

Actively demonstrating commitment to equality, diversity and inclusion through all aspects of workplace operations and management giving clear consideration to equality of opportunity in employment, skill development and career advancement, particularly with under-represented segments of society in the area of local operations. Documenting a diversity and inclusion approach, which as a minimum should include commitments to identify, measure and improve a culture of inclusion for each of their stakeholder groups; with clear accountability and monitoring of progress across all levels of operations and management.

- **Inclusive supply chain management**

Drive active management of downstream supply chains as part of their commitment so that the principles of diversity and inclusion are encouraged through their supply chain. As part of this active management we expect our suppliers to contribute to our supplier diversity and inclusion efforts by recruiting, utilising and developing diverse businesses on Barclays 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 women-owned, ethnic-minority-owned, LGBT-owned, Veteran-owned businesses designation.

### 4. Society

Barclays recognises the impact our procurement practices may have on local society. We encourage our suppliers to avoid decisions that may have a negative social or economic impact on society, including:

- **Local development**

Demonstration of employee or corporate initiatives designed to improve the social and economic conditions of those within the local/regional geography. Avoidance of negative impacts resulting from activities considered detrimental to local society, such as encroachment and displacement of indigenous people.

- **Prompt payment of suppliers**

Adherence to prompt payment legislation or standards to ensure the ongoing economic health of businesses contracted to provide goods and services in the supply chain.

## 5. Product, Service and Operational Responsibility

Barclays has a firm commitment to deliver products and services that are responsibly sourced, produced and delivered to our customers and clients. Our supply chain partners are expected to support this commitment through:

- **Health and safety**

Products and services are designed, produced and distributed in such a manner as to comply with laws, regulations and voluntary codes concerning health and safety impacts of products and services through their lifecycle. All products supplied to Barclays must meet the minimum safety standards of the jurisdiction in which they will be supplied along with relevant safety information, where applicable

- **Labelling**

Products and services are designed, produced and distributed in such a manner as to comply with regulations and voluntary codes concerning information and labelling of products and services throughout their life cycle.

- **Avoidance of banned or disputed products and services**

Demonstration of avoidance of the sale, use, marketing, and communications, including advertising, promotion and sponsorship, of banned or disputed products or services as defined by regulations and voluntary codes.

- **Fair dealing with customers**

Sales or performance incentives are designed and controlled in such a manner as to comply with regulations, voluntary codes and Barclays' incentive principles and standards, as well as, provide transparency and offer safeguards to prevent moral hazard and conduct risk that could negatively impact customers.

- **Workforce Engagement**

For UK premium listed companies and companies with 250 or more UK employees (excludes non-UK and small UK suppliers), supplier provides an attestation to Barclays that it has appropriate workplace engagement practices to fulfil the requirements of the UK Corporate Governance Code published by the Financial Reporting Council (FRC) and as defined in the Companies (Miscellaneous Reporting) Regulations 2018.

- **Responsible Technology**

*Accessibility and inclusion*

Embedding relevant accessibility standards, innovation and best practice to deliver inclusive products and services for our customers, colleagues and stakeholders. Encouraging suppliers to demonstrate commitment and ability to support Barclays' aim to deliver products and services that meet the accessibility needs of our diverse customers and colleagues, including the needs of people with disabilities. Striving to go beyond minimum accessibility standards compliance by ensuring that appropriate consultation and testing with people with disabilities is recognised as a key enabler of accessibility.



### *Artificial Intelligence*

Artificial Intelligence (AI) applications, used for Barclays' products and services, are designed in such a manner as to comply with regulations, voluntary codes and with consideration of Barclays' AI ethics principles. Systems are designed and controlled to deliver fair outcomes in a reliable and transparent way, with clear accountability for ownership of the AI system with ability to interrupt in advance or immediately upon the occurrence or potential risk of negative unintended outcomes.

AI applications are defined as anything that instructs the machine to act intelligently (i.e. learning, recognition, conversation, etc.). It is the ability of computers to perform tasks, such as recognising images, processing natural languages and learning from experience. Examples of AI include machine learning, conversation recognition and computer vision.

## 6. Extending Barclays' values & behaviours

Barclays is committed to helping people achieve their ambitions, in the right way. This purpose includes our clients and customers and is achieved through the demonstration of the **Barclays' values and behaviours** by those who interact with them:

- Respect** – We respect and value those we work with, and the contribution that they make
- Integrity** – We act fairly, ethically and openly in all we do
- Service** – We put our clients and customers at the centre of what we do
- Excellence** – We use our energy, skills and resources to deliver the best, sustainable results
- Stewardship** – We are passionate about leaving things better than we found them.

We encourage our suppliers to partner with us in achieving this goal, by ensuring that all their employees and sub-contractors who interact with Barclays' personnel, clients and customers on Barclays' behalf, demonstrate these values and behaviours. We request that where appropriate, you cascade to your employees the information contained in ['our purpose and values'](#), to help them reflect and demonstrate the Barclays values in their interactions with Barclays' personnel, clients and customers.

Supplier personnel should be aware of rules and restrictions that regulate interaction with Barclays' personnel and must endeavour to avoid non-compliance with policies. Specifically:

- **Avoidance of conduct risk**  
Reinforce compliance with policies that govern supplier interaction with Barclays' personnel such as the gift and entertainment and conflicts of interest policies. Barclays' personnel are prohibited from receiving gifts and entertainment from suppliers and must be cleared for any exceptions. Barclays' personnel must also seek approval for outside affiliations, including those with suppliers.

We want all suppliers, clients and customers to have an experience that reflects the Barclays' values and behaviours and reinforces their perception of Barclays as their bank of choice.

If you have any concerns regarding the Barclays values and behaviours not being upheld please contact us [here](#).

## 7. Raising a concern (Whistleblowing)

Barclays is committed to conducting all of its business activities ethically and in accordance with applicable laws and regulations, and the highest professional standards. Integrity in our business behaviour and in our management systems is crucial to the success of Barclays, our customers and our shareholders, as well as the fulfilment of our corporate responsibilities.

The Barclays global whistleblowing policy reflects our commitment to ensuring that concerns of potential breaches of laws, rules, regulations or compliance policy raised in good faith are handled in an appropriate manner and rectified as necessary. Whistleblowing is the process through which you can report, in confidence, such potential breaches. This could mean fraud, criminal behaviour, ethical issues, behaviour that is not in keeping with our stated values, or breaches of financial services, health and safety or regulatory obligations - or the deliberate concealment of any of those things.

We expect our suppliers to strongly encourage their employees to raise concerns (whistleblow) to Barclays about inappropriate conduct by Barclays or its employees and to make them aware of how to do this.

Our suppliers and sub-contractors can raise any concerns in confidence or anonymously (where permitted) through [EthicsPoint](#).

All reports will be treated seriously.

Our UK based suppliers, their employees and sub-contractors may also make protected disclosures to the Financial Conduct Authority (FCA). It is possible to report using the firm's internal arrangements and also to the FCA; these routes may be used simultaneously or consecutively:

Telephone: +44 (0)20 7066 9200  
Email: [whistle@fca.org.uk](mailto:whistle@fca.org.uk)  
Post: Intelligence Department  
The Financial Conduct Authority  
25 The North Colonnade  
London E14 5HS

Suppliers are required to inform their employees that they will not be subject retaliation by their employer, Barclays, or Barclays' employees as a result of raising a concern; and that if they are retaliated against, this should be reported to Barclays.

Suppliers are also invited to consider adopting appropriate internal procedures, if they do not have such a process already, which encourage workers (employees or sub-contractors) with concerns to blow the whistle internally about matters which are relevant to the functions of the FCA.

## 8. Monitoring and due diligence

Barclays has a responsibility to conduct appropriate due diligence before entering relationships with key suppliers. This may include, but is not limited to, reviewing copies of employment and health and safety policies and undertaking due diligence with the aim of establishing that none of our suppliers have any association with modern slavery and that they have not been engaged in any activity with an adverse human rights impact.

All suppliers are expected to self-monitor their compliance with our supplier code of conduct and to inform us of any non-compliance. Barclays further requires that suppliers segmented as medium and high risk to conduct an annual self-certification against our supplier code of conduct. We also expect all suppliers to provide us with responses to our reasonable requests for information about compliance with our supplier code of conduct.

High risk suppliers will also be subject to on-site audits. Any suppliers not meeting our requirements (through either self-certification or on-site review) will then be subject to measures, which may include a remediation process.

## 9. Downstream monitoring and due diligence

Suppliers are expected to perform effective due diligence procedures for downstream suppliers, subcontractors and other supply chain participants to ensure that environmental, human rights, diversity and inclusion, society, product and service responsibility, values and behaviours, whistleblowing, monitoring and due diligence standards are monitored as part of their own supplier code of conduct.

