

Supplier Code of Conduct

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This Code of Conduct is intended to provide you with information about EFG Private Bank and EFG Asset Management (UK) Limited (which are together referred to as “the Bank” for the purposes of this document unless otherwise stated)

Section 1 - Our Code of Conduct

Suppliers, Employees, Board Members and External Board Members have legal, professional and ethical responsibilities towards the EFGI Group of companies, its clients and shareholders.

This Supplier code provides guidance to all our Suppliers, explaining the standards of behavior that we expect when working for the Bank in support of our internal Code of Conduct.

The requirements for you as our supplier are clear - comply with legislation and do the right thing and if ever you are asked to do anything which sits outside of these parameters then we want to hear about it.

Chief Operating Officer

1.1 Core Values

At the Bank our aim is to provide clients with the best in international private banking and wealth management services. This we can do because we recognise that good relationships are at the very heart of the service we provide.

To us relationships mean understanding, teamwork, trust, good communication and a shared vision. In a market that is 'over-banked but under-served' these core values are increasingly hard to find.

Our promise to clients is simple: the highest quality personal service, the best professional advice and access to the most effective financial solutions.

1.2 What do I do if something isn't right?

We have a zero tolerance for discrimination, fraud, bribery, tax evasion and the facilitation of tax evasion or corruption. If you are ever asked to be involved in anything unethical or illegal then you must do the right thing – speak up. The same applies if you or your colleagues are treated unfairly while working for the Bank.

This includes a zero tolerance position for any of the areas below:

- A criminal offence
- Breach of legal obligations
- A miscarriage of justice
- A health and safety danger
- Damage to the environment
- The concealing of information about any of these matters

You have a responsibility to speak up when you see behaviour or matters that sit outside of the requirements of this code and the policies and procedures it supports. If you are aware of any issues relating to the areas above, we need to know about it.

You can Speak Up confidentially to the UK Compliance department in the Bank or if you wish to talk through your concerns with an external party, you might want to contact Public Concern at Work: an independent charity providing confidential advice on whistleblowing. They can be contacted on 020 7404 6609.

1.3 What we need from you

We expect our suppliers to be committed to the Supplier Code of Conduct.

We need you to:

- Read the Supplier Code of Conduct
- Confirm your acceptance of the Supplier Code of Conduct by email acceptance to your Bank contact
- Immediately report any breaches and suspected breaches of the Supplier Code of Conduct to the Bank by contacting EFGLRegulatoryCompliance@efgl.com

This Supplier Code of Conduct sets out minimum standards of conduct. However, Suppliers are expected to exercise their best judgment to go beyond these minimum standards, as required, to ensure that behaviours always meet the highest moral and ethical standards.

Section 2

2.1 Human Rights

The Bank works in accordance with all Human Rights legislation and expect Suppliers to do likewise. Specifically, this will include no child, forced labour, threat of violence, harassment, intimidation, debt bondage, bonded labour, or compulsory overtime when providing services.

2.2 Modern Slavery

The Bank is absolutely committed to preventing slavery and human trafficking in its business activities, and ensuring that its supply chains are free from slavery and human trafficking.

All of our Suppliers must comply with the Modern Slavery Act 2015 and the Bank Modern Slavery Statement and will be required to certify their compliance annually. Failure to comply with the provisions set out within the Act could lead to the termination of your contract. A copy of our Modern Slavery Statement is available on our website.

2.3 Diversity, equality and inclusion

The Bank is committed to being an equal opportunities employer and opposes all forms of unlawful discrimination and expects all Suppliers to demonstrate the same level of commitment. We expect our Suppliers to be committed to providing equal employment opportunity to all qualified persons irrespective of a person's race nationality, religion or belief, disability, age, gender, gender reassignment, sexual orientation, pregnancy/maternity and /or marriage/civil partnership. Concern for the personal dignity and individual worth of Supplier and employee is an indispensable element in the standard of conduct that we have set for our Suppliers and ourselves.

2.4 Health and safety

The Bank is committed to complying with all current legal requirements concerning health, safety and environmental matters and to promoting the highest standards of Health and safety in the workplace. We expect our Suppliers to demonstrate that they meet the same levels of awareness and commitment.

The Bank is committed to effective communication and consultation on all health, safety and environment matters with all relevant parties, including Suppliers. It will provide appropriate Health, Safety and Environment guidance to all to enable them to meet the required standards of performance.

2.5 Sustainability

The Bank takes its responsibility for protecting the environment seriously and is committed to reducing its own environmental impact.

Our suppliers must comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.

Section 3

3.1 Bribery and corruption

The Bank is committed to carrying out business fairly, honestly and openly and has zero tolerance towards bribery involving its employees, suppliers, agents, consultants or any person or body acting on its behalf. In this context, a “bribe” means an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

We expect all our Suppliers to have the same commitment and, in particular, you must not offer bribes, kick-backs, gifts or hospitality to an EFG employee in an attempt to gain a commercial advantage.

3.2 Gifts and hospitality

The provision of gifts and hospitality is only acceptable within the limits prescribed by EFG policy and should never be made in an attempt to secure preferential treatment

The Bank expects all Suppliers to maintain a register of any gifts or hospitality provided to any Bank employee and to make this available at the request of the Bank for review. The register should cover the following:

- Name and position of all persons present and business relationship to the Bank employee
- Value of item
- Name and location of the establishment
- Date and business purpose of the event

3.3 Conflicts of interest

At the Bank, all decisions must be made with due consideration for the interests of the company, our customers and our stakeholders. The same is applicable for all of the Bank's Suppliers. As a Supplier to the Bank, you must never allow external influences, particularly friends, family or any financial or political interest, to affect your decision.

Any potential for a conflict of interest (for example a family connection between a Supplier and the Bank) must be disclosed immediately to the Bank at EFGLRegulatoryCompliance@efgl.com.

3.4 Responsible partnerships with our suppliers

The development of a responsible supply chain is critical to the success of our business now and in the future. We aim to ensure that our partners share our values and that we, in turn, treat them with trust and transparency. As a Bank Supplier, you must evaluate, select and performance manage your own suppliers openly, using clear and objective criteria.

3.5 Competition

Whenever and wherever you operate, you must comply with fair competition legislation. You must never enter into any price-fixing arrangements, share sensitive price information, attempt to rig bids or undertake restrictive practices with competitors or supply chain partners, either directly or indirectly. Undertaking any of these practices will lead to the termination of your contract.

Section 4

4.1 Information management and security

Information is one of our most valuable assets and our employees and suppliers must do all that they can to protect it. Secure information helps to ensure business continuity and reduce disruption by preventing or minimising the impact of security breaches. It also demonstrates to clients that we handle their information with care, giving them added confidence in our integrity.

We expect our suppliers to have appropriate information, physical, personnel and cyber security requirements and standards. To notify EFG if becoming aware of any security incident that may affect Bank data or assets.

Examples of additional requirements may include providing evidence of:

- Compliance to security best practice frameworks
- Staff vetting and compliance with clearance requirements.
- Controls that meet the Bank's information security standards and
- Additional controls where contractually agreed.
- Policies and procedures to protect sensitive Bank information.
- Appropriate security controls for sub-contractors and supply chains.
- Secure networks, IT operations, development and change activities for technology assets.
- Procedures for the timely identification and management of Incidents.

4.2 Data protection / confidential information

The Bank handles personal and confidential information relating to our people and our clients on a daily basis in line with the General Data Protection Regulation (GDPR) 2018 and other applicable data protection laws.

What we expect from our suppliers:

To comply with privacy and data protection laws, and our contract terms, to protect individuals and the Bank from risk Examples of additional requirements may include providing:

- A policy, or equivalent, which expresses your commitment to managing data protection appropriately.
- The name of a senior manager responsible for data protection.
- An overview of data protection training and other confidentiality obligations for staff.
- Risk management procedures relating to data protection compliance.
- A record of processing activities, as it relates to Bank data.
- Information security arrangements.
- Other confirmation relevant to your compliance with the General Data Protection Regulation (GDPR) and other data protection laws.

We are committed to ensuring this information remains secure at all times. All of the Bank's Suppliers must ensure that they do the same.

As an organisation processing personal data, the Bank and Suppliers must comply with the data protection principles. These state that when we process personal data:

- We must do so fairly, transparently and lawfully;
- We may only process it for specified and lawful purposes;
- It must be adequate and relevant for our purposes, limited to what is necessary, accurate and kept for no longer than necessary;
- We must do so in a way that ensures appropriate security and must protect it from unauthorised and unlawful processing and against accidental loss or damage.
- We must ensure that we uphold any rights that individuals may have in relation to their data.

What data protection obligations will apply to you in practice will depend on the services you provide. You must ensure that all Bank data is kept securely and safely and that procedures designed to achieve this are followed. You should not share any confidential information unless specifically authorised to do so by the Bank's management.

4.3 Financial Crime

The Bank is committed to the promotion of an anti-fraud culture and to ensuring that all staff and suppliers throughout the business identify and manage financial risk to protect the Bank's customers, assets and reputation. You must not ask or encourage a Bank employee and or sub-contractor to engage in a relationship with you, which could result in any fraudulent behavior.

4.4 Media

All enquiries about EFG Private Bank Limited should be referred to the Bank. No Suppliers should speak to journalists, write or contribute to articles for publication without authority from the Bank. This includes any reference to the Bank within any promotional material or on any social media sites.