

Brown Brothers Harriman Supplier Code of Conduct

1. Introduction

Brown Brothers Harriman (“BBH”) believes “Sustainability” means running our firm responsibly and ethically, while contributing positively to our clients, our people, and our communities. BBH seeks to enter into business partnerships with companies who share these values. Therefore, we ask all suppliers to adhere to the BBH Supplier Code of Conduct (“Code”).

Adherence to the Code is not a contractual commitment; however, existing and potential suppliers should be aware that BBH will take their willingness to adhere to the principles of the Code into account as part of our regular vendor review and selection process.

2. Scope

For the purposes of this Code, “supplier” refers to any third party that provides products or services to BBH. This definition encompasses not only the supplier’s primary business entity but also its owners, officers, directors, employees, consultants, affiliates, contractors, and subcontractors. Throughout this Code, any reference to “personnel” applies equally to the supplier’s own workforce as well as those of its subcontractors.

3. Applicability and ongoing adherence

This Code applies to all suppliers who are considering participating in a request for proposal to deliver goods or services to BBH. Suppliers are expected to continuously review and monitor their alignment with the provisions of this Code. BBH encourages open communication and expects suppliers to proactively address any conflicts.

4. Legal and regulatory compliance

BBH expects its suppliers to maintain compliance with all relevant laws and regulations in every jurisdiction in which they operate. Suppliers are also required to uphold the principles articulated in this Code as allowed by local customs and legal obligations.

5. Human rights

BBH is a signatory of the UN Global Compact and is committed to upholding human rights. BBH expects its suppliers to share our commitment to human rights and equal opportunity in the workplace. Suppliers must treat their workers with dignity and respect.

Wages and benefits:

Suppliers are required to adhere to all relevant laws regarding the accurate and timely payment of wages, including minimum wage, benefits, and overtime compensation. Paid time off should also be provided.

Health and safety:

Suppliers must integrate health and safety management practices, provide a safe and healthy work environment for their employees, and fully comply with all applicable safety and health laws and regulations.

Modern slavery:

BBH holds itself accountable to the rigorous principles of the Modern Slavery Act. We cultivate an environment that mandates the highest of ethical standards, encourages a strong personal code of conduct, supports our employees with a healthy and safe workplace free from discrimination, and ensures fair pay for all employees. We expect our suppliers to hold themselves to equal standards.

BBH expects suppliers to strictly forbid all forms of slavery, including forced, compulsory, bonded, involuntary, trafficked, and child labor across their business and supply chain. Suppliers must comply with local laws and industry standards regarding compensation and working hours.

Grievance mechanisms:

Suppliers should maintain a formalized and fair process for employees to raise grievances related to human rights violations, ensuring issues are addressed and resolved without fear of retaliation. BBH also expects suppliers to provide an accessible grievance mechanism for their suppliers and other stakeholders to report practices that may breach laws or supplier policies. All concerns should be appropriately documented and resolved without retaliation.

6. Fair and inclusive access to opportunities

BBH welcomes and supports the diverse backgrounds, viewpoints, and circumstances of all our employees and believes inclusivity and fairness are critical to our success. We believe that our suppliers should have similar standards. BBH expects each supplier to have policies in place to ensure fair treatment and access to opportunities and prevent discrimination for all employees.

BBH expects its vendors to have policies in place that prohibit, prevent, and/or remediate harassment, disrespectful, hostile, or abusive behavior of any kind. Additionally, BBH expects its vendors to have policies in place that prohibit discrimination based upon an individual's ethnicity, race, color, national origin, age, religion, disability status, marital status, sex, gender, pregnancy, sexual orientation, gender identity and expression, citizenship or any other characteristic protected by law.

Suppliers should ensure goods and services provided to BBH are accessible to people with disabilities where possible. Additionally, BBH expects suppliers to periodically review the accessibility of their goods and services for people with disabilities.

7. Environmental responsibility

BBH is committed to supporting environmental sustainability by reducing our GHG emissions and resource consumption throughout our facilities and operations. We strive to work with suppliers that share our commitment to being responsible stewards of the environment.

BBH expects each supplier to:

- Regularly assess and work to reduce the environmental impacts of their operations
- Strive to reduce greenhouse gas emissions from their operations
- Comply with all environmental laws and regulations applicable to their operations.

8. Sustainability policy and reporting

BBH expects its suppliers to encourage sustainability throughout its business and value chain by considering the environmental, social, and governance impacts from its operations. BBH encourages suppliers to participate in voluntary reporting on material issues related to that commitment.

9. Legal and regulatory requirements

As BBH's environment is highly regulated, the goods and services that suppliers provide to BBH may be directly relevant to how BBH ensures compliance with its regulatory obligations. Therefore, suppliers should ensure they can meet the below requirements before responding to a request for proposal:

- **Confidential information** – Suppliers may receive confidential information related to BBH or its clients, which must only be used for its intended purpose and disclosed on a strict “need to know” basis. Where necessary, information barriers should be implemented.
- **Personal data** – Suppliers may process personal data of BBH clients, employees, or stakeholders. Such processing must comply with applicable data protection and privacy laws, and only occur as necessary to deliver goods and services. Suppliers will be contractually required to process personal data only as instructed by BBH, comply with all privacy requirements, and promptly report any potential data breaches.
- **Conflicts of interest** – Suppliers must be able to demonstrate how they manage conflicts of interest and escalate any conflicts – personal or professional – that arise while providing goods or services to BBH.
- **Anti-financial crime** – Suppliers are expected to have controls to detect and investigate criminal activity, including money laundering, terrorism financing, tax evasion, sanctions violations, bribery, corruption, or fraud. Suppliers may be asked to provide details of their internal policies and must notify BBH of any suspected criminal activity by their personnel, as permitted by law.

- **Anti-money laundering and anti-terrorism financing** – Suppliers must have policies and controls to mitigate risks of money laundering and terrorism financing, both internally and in relation to the delivery of goods and services. BBH may request details on these policies and related training.
- **Prevention of tax evasion facilitation** – Suppliers must maintain and periodically review controls to prevent personnel from committing or facilitating tax evasion in connection with services provided to or by BBH. Policy details may be requested by BBH.
- **Embargoes and economic sanctions** – Suppliers must ensure compliance with embargoes and sanctions regulations and promptly notify BBH of any suspected breaches.
- **Anti-bribery and corruption** – Suppliers must not offer gifts or entertainment to BBH employees during tendering or business relationships, nor to external parties on BBH's behalf. Suppliers are expected to maintain anti-bribery and gifts policies and provide them to BBH upon request.
- **Anti-fraud** – Suppliers must have policies and controls to prevent fraud, defined as any intentional act or omission to gain an advantage or avoid a disadvantage. Policy details may be requested by BBH.
- **Fair and free markets** – Suppliers must not engage in manipulative, illegal, or unethical practices, and must have safeguards against insider dealing and anti-competitive behavior. BBH may request evidence of these safeguards.
- **Monitoring of communications** – BBH reserves the right to monitor, review, access, record, and disclose information and data created, sent, received, downloaded, or stored using BBH's systems or premises, subject to local privacy laws.
- **Policy compliance** – When supplier personnel provide services to BBH, they may be required to comply with BBH's internal policies relevant to their role. BBH will provide such policies as needed.

This Code is intended to raise awareness of BBH's expectations for supplier conduct. While not legally binding, failure to meet these standards may reduce opportunities to work with BBH. Legal obligations will always be defined in the contract between BBH and its suppliers.