



## Supplier Code of Conduct

Funding Circle is guided by five core values that are at the core of our culture: Obsess over the customer, Make it happen, Stand together, Think smart, Be open, Live the adventure.

This Supplier Code of Conduct outlines Funding Circle's business ethics and sets the minimum expectations and standards for all Funding Circle Suppliers in relation to workforce standards, human rights, diversity & inclusion, integrity & ethics, tax strategy and the environment.

### Scope and Compliance

Funding Circle's Supplier Code of Conduct applies to all Suppliers or any other person or persons associated or doing business for or with Funding Circle, no matter where they are located (within or outside of the UK); provided, however, that we may be limited in our ability to positively influence suppliers' conduct and we may be limited in our ability to source products and services from suppliers that fully comply with the Supplier Code of Conduct.

Funding Circle expects all Suppliers and business partners that we work with to observe the high standards set in this Supplier Code of Conduct and to strive to act honestly in all aspects of business. To facilitate this we share our Supplier Code of Conduct with our Suppliers. We rely on Suppliers to report any known or suspected violations of this Supplier Code of Conduct and Suppliers are encouraged to report any suspected occurrence of corruption or coercion to their procurement contact or [legal-uk@fundingcircle.com](mailto:legal-uk@fundingcircle.com).

Funding Circle expects Suppliers and any subcontractors, providers, agents or any others acting on our behalf to abide by all applicable laws, regulations and other legal requirements in jurisdictions where they operate.

### Human Rights Commitment

Funding Circle conducts business in accordance with the highest legal and ethical standards. Respect for human rights is fundamental for us and we strive to respect and promote human rights in accordance with international human rights principles as outlined in our Human Rights Statement.

We require all Suppliers to respect fundamental human rights to ensure all their workers are treated with dignity and respect.

### Fair Treatment

We are committed to our values of Obsess over the customer, Make it happen, Stand together, Think smart, Be open, Live the adventure. We act responsibly in all business dealings and expect our Suppliers to uphold these principles and urge them to adopt similar policies within their own businesses. We expect all Suppliers to treat any company's employee and non-employee direct



operations workers, any fixed-term/temporary employees, contractors, agency workers and/or third party on site workers fairly and equally.

#### Working Hours, Rest Days & Compensation

We are committed to ensuring we are aligned to the voluntary real national and London living wages for all our employees based in the United Kingdom. Our goal is to ensure fair and appropriate compensation for all our employees.

We ask any Suppliers providing us with goods or services to pay at least the local living wage to any employees and non-employees (including fixed-term/temporary employees, contractors, agency workers and/or third party on site workers).

We expect our Suppliers to ensure that working hours, including overtime, do not exceed applicable legal limits and to ensure fair and proper hiring, firing, and performance evaluations to any employees and non-employees. Suppliers shall comply with local laws regarding payment and working hours, including overtime, rest days and public holidays.

#### Freedom of Association & Collective Bargaining

We recognise that freedom of association and the right to collective bargaining are fundamental rights. A core value at Funding Circle is Stand Together, and we recognize and support our colleagues' rights to association and collective bargaining. We expect our Suppliers to uphold these principles and urge them to adopt similar policies within their own businesses.

#### Grievance Mechanism

We rely on Suppliers to report any known or suspected violations of this Supplier Code of Conduct and Suppliers are encouraged to report any suspected occurrence of corruption or coercion to their procurement contact or [legal-uk@fundingcircle.com](mailto:legal-uk@fundingcircle.com).

#### No Child Labour and Modern Slavery

We do not tolerate the use of child labour and expect our Suppliers not to use children in their operations or their value chains. We also expect our Suppliers to allow all employees to leave their employment freely upon reasonable notice, and never use any forced labour or involuntary prison labour.

Therefore, we expect our Suppliers to ensure there is no inhumane treatment or threat to workers, including any harassment, corporal punishment, or mental or physical coercion of workers. Suppliers must treat all workers with dignity and respect.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have

in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain. We expect the same high standards from all of our Suppliers, contractors, and other business partners.

### A Safe & Healthy Workplace

Health and safety are a pivotal part of our continued commitment to a healthy and safe workplace. We expect any Supplier to take any reasonable steps to:

- Provide adequate control of any health and safety risks arising from its workplace activities
- Involve and consult where possible its employees on matters affecting their health and safety
- Provide and maintain safe equipment
- Provide information, instruction, and supervision for employees
- Prevent accidents and cases of work-related illness
- Maintain safe and healthy working conditions
- Review and revise its Health and Safety Policy and Procedure as necessary at regular intervals.

Our Suppliers should provide workers with a safe and healthy workplace that complies with all applicable health and safety laws and regulations, in which employees are treated with respect and do not suffer from harassment, bullying, visual, verbal and physical abuse or any conduct that creates an intimidating, offensive or hostile workplace.

Safe and healthy working conditions include offering emergency training and resources, practising industrial hygiene, and enacting equipment safety initiatives, as appropriate. Suppliers should take proactive measures to prevent workplace hazards.

### Diversity, Inclusion & Equal Opportunities

We are committed to promoting equality, diversity and inclusion, preventing unlawful discrimination and ensuring that our colleagues all feel respected and safe at work.



We expect all Suppliers to take any necessary steps to provide equality, fairness and dignity for everyone, oppose and prevent all forms of unlawful discrimination, create a working environment free of bullying, harassment, victimisation and unlawful discrimination, where every person's individual differences and contributions are valued and respected.

We publish gender pay gap data on an annual basis and we expect all Suppliers to publish annual gender pay gaps reports where data is available, we also ask our Suppliers to ensure that all employees are given equal treatment as regards terms and conditions of employment and are protected against wage discrimination based on gender, ethnicity, religious belief, sexual orientation and any other discriminatory practices.

#### Business Integrity, Ethics & Anti-Corruption

We strive to maintain the highest standards of governance, personal and corporate ethics, and to comply with all applicable laws and regulations. Funding Circle's Global Anti-Bribery and Corruption Policy applies to all employees and others associated with our firm.

We expect our Suppliers to act and conduct themselves in the highest ethical manner in all business dealings and interactions. We rely on our Suppliers to disclose any potential or perceived conflicts of interest in relation to any ongoing service provided to our business.

#### Tax Strategy

Funding Circle is committed to being a responsible and compliant taxpayer wherever it operates. Where we contract with Suppliers we ensure that we correctly deal with our tax obligations in respect of payments to them. We ask our Suppliers to be equally responsible and compliant taxpayers in the countries where they operate, and to conduct their tax affairs in a way which is aligned with our Code of Conduct.

#### Environment and Climate Change

Our Suppliers should ensure their production processes are responsible and environmentally friendly. At a minimum, we expect our Suppliers to follow all applicable environmental laws, regulations, and standards. This includes requirements for recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting. Suppliers are encouraged to develop and maintain business practices to promote energy efficiency, reduce pollution (including greenhouse gas emissions), and conserve resources.

We expect our Suppliers to integrate Environmental, Social, and Governance (ESG) factors and climate-related risks in their management processes. Climate change refers to long-term shifts in temperatures that are changing weather patterns and disrupting the usual balance of nature. As climate change intensifies, dangerous weather events become more frequent or severe. Climate change can have a dire impact on our health, ability to grow food, housing, safety, and work.



Addressing climate change is therefore essential to improve our lives and preserve the environment. Moreover, many climate change solutions can deliver economic benefits.

In particular, we expect our Suppliers to consider how climate-related issues can impact their business continuity, their financial stability, and to fulfil the public commitments made on transitioning to low-carbon business activities.

#### Privacy & Digital Security

We take the security of our customers' personal information very seriously. We take administrative, legal, technical and physical precautions to ensure the security of personal information in accordance with the UK General Data Protection Regulation. We use personal information in accordance with our Privacy Policy. For more information please see our Data Protection and Information Security policies.

We expect Suppliers to comply with all applicable data privacy laws and regulations when identifying or processing personal information of Funding Circle, including its employees and customers.

The Company reserves the right to amend this policy at any time.