

Wesleyan 3rd Party Charter

September 2022

WESLEYAN
we are all about you

As a mutual, our ethos of care is at the heart of our company. It's in our DNA and it has been since 1841 because we believe that when we work together, our collective efforts have the power to make a difference. The 3rd Party Charter sets out the standards that are expected from our 3rd Parties, including their employees, and supply chains, who may assist in performing their obligations to us. It sets out the way in which we work and behave towards each other.

We expect our Suppliers to support and promote the following values with us:

- ▶ Be professional at all times
- ▶ Show compassion
- ▶ Respect each other
- ▶ Put customers at the heart of everything they do

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Supplier Management

Our Supplier Management approach is designed to get the most out of our suppliers. We want to encourage and promote cooperative relationships with all our suppliers and, where appropriate, collaborate, innovate and create mutual value.

What we expect of our Suppliers

- ▶ **"No Purchase Order, No Payment"**: We expect our Suppliers to issue invoices punctually and not undertake work without a valid Purchase Order being
- ▶ **Performance**: Our suppliers have documented standards, objectives, targets and plans for assessing and communicating the performance of their services and sub-contractors against goals.
- ▶ **Audits and Assessments**: Our suppliers perform periodic assessments of their operations and those of their suppliers and subcontractors to ensure compliance with their contractual obligations.
- ▶ **Documentation and Records**: Our suppliers maintain all necessary documents and records to enable compliance with all applicable laws and regulations.
- ▶ **Risk Management**: Our suppliers maintain a process, and implement appropriate procedures and controls, to identify, monitor and manage risks.
- ▶ **Corrective Action Process**: Our suppliers have a documented process for ensuring the timely correction of any deficiencies or breaches identified. This process could be an internal or external audit, assessment, investigation or review.
- ▶ **Continuous Improvement**: Our suppliers have an ongoing process to obtain 360-degree feedback on their practices to foster continuous improvement.

Useful links

- ▶ [Outsourcing and operational resilience | PS21/3 FCA FG16/5: Guidance for firms outsourcing to the 'cloud' and other third party IT services | FCA](#)

Anti-Bribery, Corruption & Conflicts of Interest

Wesleyan is committed to conducting our business in an impartial, fair and honest way, and we expect you to be impartial, honest and fair as you conduct your business. We have a zero-tolerance approach to any type of influential bribery, fraud or corrupt business practices. We expect you to notify us if you suspect any inappropriate activity at Wesleyan or in your own organisation. Please contact your usual Wesleyan contact, or if you are unable to, then you should get in touch with the Head of Procurement and Supplier Management or our Money Laundering and Reporting Officer or use our Speaking Out process.

We expect you to notify us promptly of any conflicts of interest which may be relevant to you conducting business with us.

What we expect of our Suppliers

We expect you to have a programme in place to prevent bribery and corruption including actions within your supply chain.

- ▶ Have procedures in place in accordance with all applicable local, or national laws or regulations including and without limitation the UK Bribery Act 2010 and UK Finance Act 2017 (Criminal facilitation of Tax Evasion)
- ▶ Have processes in place to protect employees who provide information related to any unfair or inappropriate business activities (e.g. Speaking Out).
- ▶ Your work must be carried out in a way that is free from any suggestion of improper influence.

Useful links

- ▶ [UK Bribery Act 2010](#)
- ▶ [UK Criminal Finances Act 2017](#)
- ▶ [Companies Act 2006 \(CA 2006\)](#)
- ▶ [Speaking Out](#)

Modern Slavery

Wesleyan's suppliers must ensure that they and also their supply chains including manufacturers and producers are free from slavery, child labour, human trafficking and exploitation as these terms are internationally understood within the meaning of the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons ('Palermo Protocol') and the <https://www.wesleyan.co.uk/modern-slavery>

We expect our suppliers to be proactive in ensuring that they themselves and also their supply chains are not involved in this type of activity. We ask our suppliers to keep us apprised of the work they are doing in this important area, including audits, education programmes, and conducting investigations. All suppliers where requested should also provide a copy of their annual Modern Slavery statement to their Wesleyan contact annually.

Resilience

As a Supplier to Wesleyan you must ensure that you and your supply can recover services in the event of disruption within the timescales you have committed to. To achieve this, you should ensure that you have in place a business continuity plan and where appropriate a disaster recovery plan too which is shared with us and is tested on a regular basis.

Operational resilience is the ability of firms, financial market infrastructures and the financial sector as a whole to prevent, adapt and respond to, recover and learn from operational disruption (FCA Policy Statement PS21/3). Wesleyan require all Outsourcers to ensure they are fully prepared to reduce the risk of operational disruption and harm to our customers.

What we expect of our Suppliers

- ▶ You to be operationally resilient by having a comprehensive understanding and mapping of the people, processes, technology, facilities and information necessary to deliver the services to us/our customers.
- ▶ Have in place a documented plan for recovery which is shared and tested with Wesleyan on at least an annual basis
- ▶ Your supply chain, subcontractors and/or 4th Parties to be able to recover services to meet the timeline set out in your plan. You to be able to recover services in the timescale set out in your plan.

Useful links

- ▶ [ISO 22301 Business continuity Framework](#)
- ▶ [FCA Policy Statement PS21/3](#)

Cyber Security

We take the security of data and IT systems extremely seriously. As the threats around online activity rapidly grow, it is increasingly important to ensure we protect our people, customers, property, assets and reputation.

It is essential that suppliers take all necessary steps to safeguard the security and privacy of their systems, their supply chains' systems and our data. Depending on the level of integration and/or data sharing, we may ask suppliers to complete a questionnaire and provide supporting evidence where necessary at least annually.

What we expect of our Suppliers

- ▶ Suppliers to inform us without delay in the event of a cyber incident and/or loss of information (irrespective who is "at fault" and even if Wesleyan is not impacted).
- ▶ Be able to demonstrate robust controls of their internal and supply chains systems.
- ▶ Be aware of marketplace vulnerabilities which may impact/disrupt the supply of services.

Useful links

- ▶ [ISO27001](#)

Health & Safety

As employers, we all have a duty of care towards our employees and their health & safety at work.

What we expect of our Suppliers

- ▶ Protect people in the workplace e.g. have in place and have communicated appropriate procedures, provided adequate training and provide suitable protection where required
- ▶ To apply good practice, irrespective of where in the world the work is carried out.
- ▶ Have the correct types of insurance policies and required levels of insurance in place
- ▶ Provide appropriate support services for their employees
- ▶ For suppliers who need to be on-site at one of our Wesleyan locations, you will be required to work in accordance with all Wesleyan policies and procedures

Useful links

- ▶ [Health & Safety at Work Act 1974](#)

Taxation & Regulation

We expect our suppliers to operate within the letter and spirit of the law. This includes working openly, co-operatively, and collaboratively with taxation authorities and regulatory bodies.

Sustainability

It is important to us and our customers to make a positive impact for our environment. We believe that when we work together, our collective efforts have the power to make a difference.

What we expect of our Suppliers

- ▶ We are committed to becoming operationally carbon neutral by the end of 2023 and our Suppliers should be working towards a similar goal and be able to support us in achieving ours.
- ▶ All our Suppliers to operate in an environmentally responsible and efficient manner and strive to minimize adverse impacts on the environment.
- ▶ All Suppliers are to complete sustainability and environmental due diligence during the supplier onboarding process and provide regular updates.
- ▶ Our suppliers are requested to share with us their adopted standards or consider how they could adopt and aspire working to standards.

Useful links

- ▶ [The Net Zero Strategy of UK Government - Net Zero 2050](#)
- ▶ [United Nations Framework Convention on Climate Change \(UNFCCC\)](#)
- ▶ [ISO 14001 Environmental Standard](#)
- ▶ [Science Based Targets Initiative](#)

Equality, Diversity, Inclusion & Accessibility

We strive to create an environment that encourages people to be themselves. Today, Birmingham is the UK's most culturally and ethnically diverse city outside London. Like our home city, Wesleyan values diversity and opportunities to work with us are open to everyone. Wesleyan wants to be sure that our own supply chain is accessible and inclusive to all, regardless of age, disability, religion, gender, race, ethnicity, sexual-orientation or socio-economic background.

What we expect of our Suppliers

- ▶ To apply the principles of accessibility and inclusivity to all in their recruitment and other employment practices.

- ▶ Have policies, procedures and training in place to promote the principles of EDIA
- ▶ On request to provide data on employment practices, and the success of initiatives and projects.

Useful links

- ▶ [The Equality Act 2010](#)
- ▶ [Stonewall](#)
- ▶ [Women in Finance](#)
- ▶ [Disability Confident](#)

Ethical Practice

We encourage all employees, customers, suppliers, and any other parties, who become aware of a breach of ethics and/or compliance rules to report this.

What we expect from our Suppliers

- ▶ Procure goods and services in accordance with all relevant local and international legislation
- ▶ Use fair and objective means of selecting companies for its own supply, with evidence to support this
- ▶ Have a prompt payment ethic in place and actively monitor their performance in meeting this
- ▶ That all business is conducted with Honesty, Integrity, Loyalty, Trustworthiness, Fairness, Concern for Others, Respect, and be law abiding

Useful links

- ▶ [Speak out policy](#)

Charitable & Community work

We encourage our employees and suppliers to engage with charities and community groups to help the vulnerable of society and support other valuable causes.

We want our suppliers to let us know what you are doing, especially where there could be ways, we can help each other achieve more for our communities.

Useful links

- ▶ [Wesleyan Foundation](#)

Collaboration & Communication

Wesleyan celebrates our suppliers being involved in schemes and initiatives to further the important principles and practices noted in this Supplier Charter. Where possible, we look to work collaboratively with our suppliers to help drive progress.

We want to do the right things too. If you can see areas where Wesleyan can do better, or you want you to let us know about something please make contact through the links below.

Useful links

- ▶ Please contact Procurement & Supplier Management
procurementsuppliermanagement@wesleyan.co.uk

Where Wesleyan has a contract with you, nothing in this Supplier Charter shall have the effect of overriding any of its provisions.