

# Wesleyan

## Supplier Charter 2025



**WESLEYAN**  
*we are all about you*



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# Your Responsibilities



***At Wesleyan, care is at the heart of everything we do. As a mutual founded in 1841, our purpose has always been to make a meaningful difference guided by a culture of compassion, professionalism, and respect. This ethos continues to shape how we work and how we partner with others.***

We recognise that our suppliers play a vital role in helping us deliver brighter financial futures for the professions we all trust. That is why we view our suppliers not just as vendors, but as valued extensions of our team. This Supplier Charter sets out the standards and behaviours we expect from all third parties, including their employees and supply chains, who support us in delivering our services.

## ***Our Shared Values***

We ask our suppliers to uphold and promote the following values in every interaction:

- ▶ Always be professional
- ▶ Show compassion
- ▶ Respect each other
- ▶ Put Wesleyan and our customers at the heart of everything they do

These values reflect the way we work and the relationships we strive to build with each other, our partners, and our customers.

## ***Our Culture in Action***

To fulfil our purpose, we are committed to building a truly inclusive, high-performance culture. This means working in ways that are customer-centric, resilient, and sustainable. We expect our suppliers to align with the behaviours that underpin our success, not just as principles, but as everyday actions that drive meaningful outcomes.

## ***Our Core Behaviours***

### **1. What's My Evidence?**

We value curiosity and critical thinking. Decisions should be informed by quality data and thoughtful analysis.

### **2. Make the Call**

We take ownership and act with accountability. That means prioritising effectively and delegating with purpose.

### **3. Care About the Result**

We focus on outcomes that matter—simplifying processes, building resilience, and putting customers first.

### **4. Listen Hard, Talk Straight**

We communicate openly and collaborate with clarity and respect.

# ***Supplier Charter***

Sets the minimum standards of business conduct we expect from all our suppliers.

This document will be updated from time to time.





# ONE

## Legal and Ethical Compliance

*Suppliers shall fully comply with all applicable laws and regulations.*

*Compliance with all applicable laws and regulations is standard practice for Wesleyan. We require all our suppliers and extended supply chain to adopt the same approach.*

### 1.1. Legal Obligations

Suppliers must comply with all applicable laws, regulations, and guidelines relevant to their operations and activities, across all jurisdictions in which they operate. This obligation extends to their own supply chains, subcontractors, and any third parties acting on their behalf. Suppliers are expected to be open, transparent, and cooperative with regulators enforcing lawful standards. Our general standard for supplier contracts is that they are governed by English law and any disputes or claims shall be subject to the jurisdiction of the English courts. Suppliers shall provide appropriate training to their employees, to ensure compliance with relevant law, policies, and procedures.

### 1.2. Competition and Anti-Trust Standards

Suppliers must observe all applicable competition and anti-trust laws, including the UK Competition Act 1998 and the Enterprise Act 2002, as amended by the Digital Markets, Competition and Consumers Act 2024. Suppliers must not engage in any practices that distort competition, such as price-fixing, market sharing, bid-rigging, or abuse of market dominance. Fair and independent competition is always expected.

### 1.3. Fraud and Financial Integrity

Suppliers must not engage in any form of fraudulent activity, including but not limited to fraud, theft, tax evasion, or money laundering. This applies regardless of whether Society assets or third-party assets are involved. Suppliers must have procedures in place to comply with legislation such as the UK Finance Act 2017 (Criminal Facilitation of Tax Evasion) and the Economic Crime and Corporate Transparency Act 2023.

### 1.4. Anti-Bribery and Corruption

Suppliers must fully comply with all applicable anti-bribery and anti-corruption laws, including the UK Bribery Act 2010. All work must be conducted free from any suggestion of improper influence. Suppliers are expected to have a robust anti-bribery and corruption programme in place, including measures that extend to their own supply chains.

### 1.5. Whistleblowing and Speaking Out

Suppliers must have appropriate processes in place to protect employees who raise concerns or report unfair, unethical, or illegal business practices. This includes ensuring that individuals who speak out are protected from retaliation and that concerns are handled confidentially and appropriately.

### Useful References

- ▶ Economic Crime and Corporate Transparency Act 2023 - GOV.UK
- ▶ UK Bribery Act 2010
- ▶ UK Criminal Finances Act 2017
- ▶ Companies Act 2006
- ▶ Speaking Out (Whistleblowing Guidance)





# TWO

## Environmental Sustainability

*Wesleyan is committed to making a positive impact on the environment for our customers, communities, and future generations. We believe that when we work together, our collective efforts can drive meaningful change.*

*We expect our suppliers to share this commitment and actively contribute to our sustainability goals.*

### 2.1. Commitment to Environmental Responsibility

Suppliers are required to demonstrate a clear commitment to environmental sustainability and to actively contribute to reducing their environmental impact. Suppliers should recognise their role in supporting a healthier planet and operate in a way that promotes long-term environmental stewardship.

### 2.2. Compliance with Environmental Legislation

Suppliers must ensure that their operations, including those of their subcontractors and supply chains, comply with all applicable environmental laws, regulations, and standards in the jurisdictions where they operate.

### 2.3. Climate Action and Carbon Reduction

Suppliers should be working towards reducing their carbon emissions and environmental footprint. This includes setting measurable environmental targets and being prepared to demonstrate progress when requested.

### 2.4. Responsible Environmental Practices and Waste Compliance

Suppliers must operate in an environmentally responsible and efficient manner. This includes minimising waste, reducing energy and water consumption, preventing pollution, and managing resources sustainably. Suppliers must also comply with all applicable packaging and waste regulations, including the UK's Extended Producer Responsibility (EPR) requirements under the Producer Responsibility Obligations (Packaging Waste) Regulations 2024. This includes accurate data reporting and the use of recyclable or reusable materials wherever possible.

### 2.5. Sustainability Due Diligence and Reporting

Suppliers are required to complete environmental and sustainability due diligence during the onboarding process and where requested regular updates on their environmental performance, initiatives, and compliance with relevant standards.

### 2.6. Adoption of Recognised Standards

Suppliers are encouraged to adopt recognised environmental standards or frameworks, and to share these with us. Where no formal standards are in place, suppliers should consider how they can aspire to and work towards recognised best practices.

### 2.7. Sustainability Reporting and Transparency

Suppliers should align with the UK Government's Sustainability Reporting Guidance 2025–26. This includes transparent reporting of environmental performance, such as Scope 1 and 2 emissions, and material Scope 3 emissions where relevant.

### Useful References

- ▶ UK Government Net Zero Strategy – Net Zero 2050
- ▶ United Nations Framework Convention on Climate Change (UNFCCC)
- ▶ ISO 14001 Environmental Management Standard
- ▶ Science Based Targets Initiative (SBTi)





# THREE

## Human Rights and Social Sustainability

*Wesleyan are committed to upholding and promoting human rights and social sustainability across our operations and supply chains. Ethical treatment of individuals and safe working environments are fundamental to responsible business practices.*

*We expect our suppliers to respect and support the rights, safety, and well-being of all individuals affected by their operations, including those within their supply chains.*

### 3.1. Respect for Human Rights Across the Supply Chain

Suppliers must uphold internationally recognised human rights standards, including those outlined in the United Nations Guiding Principles on Business and Human Rights. This responsibility applies not only to their own operations but also to their entire supply chain, such as subcontractors, manufacturers, and producers.

Suppliers must ensure that all individuals within their supply chain are treated with dignity and respect, and that their business practices do not contribute to human rights abuses. This includes implementing robust due diligence processes to identify, prevent, and address any potential human rights risks throughout their supply networks.

### 3.2. Fair Labour Practices

Suppliers are expected to provide fair working conditions, including safe and healthy workplaces, reasonable working hours, and fair wages. All forms of forced labour, child labour, and exploitation are strictly prohibited. Employment practices must comply with all applicable labour laws and standards in the jurisdictions where suppliers operate.

Suppliers must also ensure that their operations and supply chains are free from slavery, child labour, human trafficking, and exploitation, as defined by the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons ('Palermo Protocol').

Where recruitment agencies or subcontractors are used, suppliers must take all necessary steps to ensure compliance with labour rights obligations and maintain visibility over working conditions. This includes conducting appropriate due diligence, maintaining oversight, and ensuring that third parties adhere to the same standards.

### 3.3. Modern Slavery

Suppliers must be proactive in preventing modern slavery and keep us informed of the steps they are taking in this area. This includes conducting audits, delivering education programmes, and investigating any concerns. Where requested, suppliers must provide a copy of their annual Modern Slavery Statement to their Wesleyan contact. Compliance with the Modern Slavery Act 2015 and all related guidance is a must for Wesleyan suppliers.

### 3.4. Health, Safety and Wellbeing

Suppliers must provide a safe and healthy working environment for all employees and contractors. This includes implementing appropriate health and safety policies, conducting regular risk assessments, and ensuring compliance with all relevant health and safety legislation. Suppliers should also promote wellbeing initiatives and support mental and physical health in the workplace. Suppliers shall provide appropriate training to employees where relevant.

### 3.5. Community Engagement and Social Impact

Suppliers are encouraged to positively contribute to the communities in which they operate. This includes engaging with local stakeholders, supporting community development initiatives, and considering the social impact of their business activities.

### Useful References

- ▶ UN Guiding Principles on Business and Human Rights
- ▶ UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol)
- ▶ Wesleyans Modern Slavery Statement and Guidance
- ▶ Health and Safety at Work Act 1974
- ▶ The Wesleyan Foundation





# FOUR

## Equality, Diversity, Inclusion and Accessibility

*Wesleyan strives to create an environment that encourages people to be themselves. Like our home city of Birmingham, one of the UK's most culturally and ethnically diverse cities, Wesleyan values diversity and believes that opportunities to work with us should be open to everyone. Wesleyan is committed to ensuring that our supply chain is accessible and inclusive to all, regardless of age, disability, religion, gender, race, ethnicity, sexual orientation, or socio-economic background.*

*Our sourcing decisions, contracts, and supplier relationship management reflect and promote the principles of equality, diversity, inclusion, and accessibility. We expect our suppliers to ensure that no individual is victimised, harassed, or discriminated against because of sex, gender identity or expression, marital or civil partnership status, race, ethnicity or national origin, disability, religion, sexual orientation, age, or part-time status. Suppliers must comply with all applicable anti-discrimination legislation and will be treated fairly and equally throughout the tendering and procurement process, with decisions made based on clear and transparent selection criteria.*

### 4.1. Inclusive Employment Practices

Suppliers are expected to apply the principles of accessibility and inclusivity in all recruitment and employment practices. This includes ensuring that job opportunities are open to all and that workplace environments are free from discrimination and bias. Suppliers shall encourage diversity and promote an inclusive workplace which respects and observes the individual human rights of all its employees.

### 4.2. Policies, Procedures and Training

Suppliers must have appropriate policies, procedures, and training in place to promote the principles of equality, diversity, inclusion, and accessibility (EDIA). These should be embedded into day-to-day operations and regularly reviewed to ensure effectiveness. Suppliers shall provide appropriate training to their employees, to ensure compliance with relevant law, policies, and procedures. conducting appropriate due diligence, maintaining oversight, and ensuring that third parties adhere to the same standards.

### 4.3. Transparency and Reporting

Upon request, suppliers should be prepared to provide data and insights on their employment practices, including the outcomes of EDIA initiatives and projects. This helps us understand progress and identify opportunities for shared learning and improvement.

### Useful References

- ▶ The Equality Act 2010
- ▶ Association of British Insurers DEI Network
- ▶ ABI Making Flexible Work Campaign
- ▶ Women in Finance Charter
- ▶ Disability Confident (UK Government scheme to support inclusive recruitment)





# FIVE

## Ethics

*Wesleyan is committed to conducting business with the highest standards of ethics, guided by values such as honesty, integrity, fairness, respect, loyalty, trustworthiness, and concern for others. These principles are embedded throughout our Supplier Charter and underpin all our relationships and expectations.*

*We encourage all employees, customers, suppliers, and other stakeholders to report any suspected breaches of ethical or compliance standards. We expect our suppliers to reflect these values in their own operations, ensuring that all business is conducted lawfully and with transparency, accountability, and respect for others.*

### 5.1. Legal and Ethical Procurement

Suppliers must procure goods and services in accordance with all relevant local and international legislation. This includes adhering to laws governing trade, competition, anti-bribery, corruption, and fair business practices.

### 5.2. Fair and Transparent Supplier Selection

Suppliers are expected to use fair, objective, and evidence-based methods when selecting their own suppliers and subcontractors. Procurement decisions must be made transparently and without bias or undue influence. Suppliers shall make Wesleyan aware of any potential conflicts of interest as soon as reasonably practicable.

### 5.3. Prompt Payment Practices

Suppliers should maintain a prompt payment ethic, actively monitor performance against agreed payment terms, and resolve any payment issues in a timely and fair manner.

### 5.4. Gifts and Hospitality

Suppliers must ensure that any gifts or hospitality offered or received are appropriate, proportionate, and do not influence or appear to influence business decisions. Any such exchanges must comply with applicable laws and Wesleyan's internal policies.

### 5.5. Competitive Information

Suppliers must keep confidential and not share, exchange, or misuse pricing or other commercially sensitive or competitive information. All business dealings must be conducted in a manner that upholds fair competition and avoids conflicts of interest.

### 5.6. Use of Third Parties and Subcontractors

Suppliers may only engage third parties or subcontractors who comply with applicable laws and adhere to the standards set out in this Supplier Charter. Suppliers remain responsible for ensuring that these parties uphold the same ethical, legal, and operational standards.

### 5.7. Trade Compliance

Suppliers must comply with all applicable trade control laws and regulations, including those related to import/export controls, sanctions, and embargoes. Suppliers must ensure that their operations and supply chains do not breach any international trade restrictions.





# SIX

## Monitoring and Continuous Improvement

*Wesleyan is committed to maintaining high standards across its supply chain and expects suppliers to do the same. We may conduct periodic reviews, assessments, or audits to ensure compliance with the expectations set out in this Supplier Charter.*

### 6.1. Performance Monitoring

Suppliers should have systems in place to monitor their own compliance with legal, ethical, environmental, and social standards. This includes tracking performance against agreed targets and being prepared to share relevant data or documentation upon request.

### 6.2. Continuous Improvement

Suppliers are encouraged to actively seek opportunities to improve their practices and align with evolving best practices in sustainability, ethics, and governance. Wesleyan welcomes collaboration and transparency in identifying areas for improvement.





# SEVEN

## Data Security and Confidentiality

*Wesleyan takes the security of data and IT systems extremely seriously. As cyber threats continue to evolve, it is increasingly important to protect our people, customers, property, assets, and reputation. We expect our suppliers to take all necessary steps to safeguard the security and privacy of their systems, their supply chains' systems, and any data shared with or processed on behalf of Wesleyan.*

*Depending on the level of integration and/or data sharing, suppliers may be required to complete a security questionnaire and provide supporting evidence at least annually. Depending on the nature of the services, Suppliers may also need to agree specific contractual provisions with Wesleyan to maintain compliance with UK GDPR. We also expect suppliers to remain vigilant to emerging threats and marketplace vulnerabilities that could impact the delivery of services.*

### 7.1. Data Protection Compliance

Suppliers must comply with all applicable data protection and privacy laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Personal and special category data must be handled securely, lawfully, and only for authorised purposes and always in accordance with data protection and privacy laws.

### 7.2. Information Security Measures

Suppliers must implement appropriate technical and organisational measures to protect data against unauthorised access, loss, or misuse.

### 7.3. Incident Reporting and Cyber Resilience

Suppliers must inform Wesleyan without delay in the event of a cyber incident or loss of information regardless of fault or whether Wesleyan is directly impacted. Suppliers must be able to demonstrate robust controls over their internal systems and those of their supply chain.

### 7.4. Awareness of Emerging Threats

Suppliers are expected to monitor and assess marketplace vulnerabilities that may disrupt or compromise the supply of services. Proactive risk management and threat awareness are essential to maintaining operational resilience.

### Useful References

► ISO/IEC 27001:2022 – Information Security Management





# EIGHT

## Operational Resilience

*Wesleyan expects its suppliers to be resilient and capable of maintaining continuity of service in the face of disruption. Suppliers must take proactive steps to safeguard their operations and ensure reliable delivery of goods and services under all circumstances. This includes aligning with relevant regulatory expectations, such as those set out in the UK's FCA and PRA Operational Resilience regulatory requirements.*

### 8.1. Business Continuity and Disaster Recovery

Suppliers must have documented business continuity and disaster recovery plans in place. These plans should address potential risks such as cyber incidents, natural disasters, and supply chain disruptions. Plans must be regularly tested, reviewed, and updated to ensure they remain effective and fit for purpose.

Suppliers are expected to provide assurance of their business continuity and disaster recovery capabilities through high-level summaries, relevant certifications (e.g. ISO 22301, ISO 27001), defined RTO/RPO targets, and evidence of regular testing, in alignment with regulatory and operational resilience standards.

Where applicable, suppliers should align with the FCA's and PRA's operational resilience requirements, which include identifying important business services, setting impact tolerances, and demonstrating the ability to remain within those tolerances during disruption.

### 8.2. Risk Management and Contingency Planning

Suppliers should actively identify, assess, and manage risks that could impact their ability to deliver services. This includes maintaining adequate insurance coverage, implementing contingency arrangements, and ensuring that critical dependencies are understood and mitigated. Suppliers must also be prepared to conduct lessons learned exercises, invest in resilience improvements, and maintain clear internal and external communication plans for managing disruptions, in line with regulatory best practices.

### Useful References

- ▶ FCA SS2/21 – Outsourcing and third party risk management
- ▶ Outsourcing and Operational Resilience
- ▶ ISO 22301:2019 – Business Continuity Management Systems
- ▶ ISO 22301 – Business Continuity





# NINE

## Supplier Grievance Process

*We believe in open and transparent communication. Suppliers should have a formal grievance mechanism in place to allow employees, contractors, and other stakeholders to raise concerns safely and confidentially.*

### 9.1. Reporting and Resolution

Suppliers must ensure that concerns related to unethical behaviour, human rights violations, or breaches of this Charter can be reported without fear of retaliation. All grievances should be investigated promptly and fairly, with appropriate corrective actions taken where necessary.

### 9.2. Escalation to Wesleyan Assurance Society

Where a concern relates to Wesleyan or its operations, or if a supplier is unsure how to handle a grievance, they are encouraged to escalate the matter to their Wesleyan contact or through Wesleyan's designated reporting channels or in accordance with any contractual dispute or escalation procedure that has been agreed.





# TEN

## Collaboration and Communication

*Wesleyan values open, honest, and constructive relationships with its suppliers. We celebrate and encourage supplier participation in schemes and initiatives that support the principles outlined in this Supplier Charter. We aim to collaborate with our suppliers to drive continuous improvement and shared progress.*

*We are committed to learning and evolving. If you identify areas where Wesleyan can improve, or if you wish to raise a concern or share feedback, we welcome your input.*

### 10.1. Open Dialogue and Feedback

Suppliers are encouraged to maintain open lines of communication with Wesleyan. Constructive feedback, suggestions for improvement, and insights into best practices are always welcome.

### 10.2. Contact Information

For any queries, concerns, or feedback related to this Supplier Charter or your relationship with Wesleyan, please contact:

**Procurement & Supplier Management**  
[procurementsuppliermanagement@wesleyan.co.uk](mailto:procurementsuppliermanagement@wesleyan.co.uk)

### 10.3. Contractual Precedence

Where Wesleyan has a formal contract in place with a supplier, the terms of that contract take precedence. Nothing in this Supplier Charter overrides or replaces the provisions of any legally binding agreement.





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