

## Man Group Supplier Code of Conduct

### Foreword

As one of the world's largest active investment management firms, we have a responsibility to ensure our supply chain creates a positive impact on our wider communities and environment. Whilst our third-party engagements are underpinned by contractual relationships, we rely upon and place trust in our suppliers, including sub-contracted suppliers, to act with integrity and within local regulations as applied to their business and jurisdictions. We intend to lead by example and will endeavour to work closely with our suppliers to rise to the opportunity of addressing the global, social and environmental challenges that we all currently face.

We recognise that business practices continually evolve, and we aim to construct a flexible, sustainable supply chain that is continually enhanced by the latest standards of excellence. For this reason, we will periodically review this document and make revisions as needed. Whilst this document doesn't serve as a legally binding contract, it does set out the minimum standards that we expect our third-party suppliers to hold themselves to.

Please see below for an overview of the minimum standards we expect all of Man Group's suppliers to adhere to across: economic activities, consideration of environmental impact, and engagement with wider communities.

### Expected Standards

#### Economic

##### Anti-bribery and Corruption

Man Group has a zero-tolerance policy for bribery and corruption, and we expect those who provide services to us, or who work on our behalf, to have the same commitment wherever in the world they are doing business.

When conducting business, for or on behalf of Man Group, you must not:

- Authorise, offer, promise or give a bribe
- Request, agree to receive or accept a bribe
- Offer anything of value to a public official (or to someone connected to a public official) in order to influence them
- Make any facilitation or 'grease' payments.

##### Gifts & Entertainment

Man Group has a strict policy in place regarding the acceptance or provision of gifts and entertainment by its employees.

Suppliers should refrain from offering or accepting any gifts or entertainment without ensuring that the recipient or donor has obtained proper internal approvals.

### Anti-Money Laundering and Financial Sanctions

Man Group is committed to complying with all applicable Anti-Money Laundering (“AML”), Counter Terrorist Financing (“CTF”) and International Sanctions laws and regulations. While acting on our behalf, we expect our suppliers to:

- not knowingly engage or attempt to engage in any transaction or business involving proceeds derived from crime
- adhere to and perform any applicable legal and regulatory requirements related to AML / CTF responsibilities
- not interact (directly or indirectly) with designated individuals and entities (such as suspected terrorists or narcotics traffickers) who are subject to international economic sanctions, trade embargoes or export restrictions.

### Facilitation of Tax Evasion

Man Group applies a zero-tolerance policy with respect to any criminal facilitation, including tax evasion and the facilitation of tax evasion via a third party in any jurisdiction.

We expect our suppliers to, at all times, comply with all applicable laws, statutes, regulations and guidance relating to the prevention of tax evasion and/or the prevention of the facilitation of tax evasion (whether within, or outside of, the United Kingdom), including but not limited to the Criminal Finances Act 2017.

### Material Non-Public Information

Material Non-Public Information (MNPI), also known as inside information, is information not known by the public but if it were, would likely have a significant impact on the price of a security or other financial instrument, or be considered important to a reasonable investor in deciding to buy or sell those securities. Buying or selling securities while in possession of MNPI that is acquired by virtue of a supplier’s relationship with Man Group is strictly prohibited, as is the communication of that information to others, whether expressly or by making a recommendation for the purchase or sale of securities based upon that information. If in possession of inside information relating to Man, suppliers must have their own procedures in place to maintain an appropriate ‘insider list’ and are expected to acknowledge, accept and comply with the obligations under the UK Market Abuse Regime.

A supplier may also gain access to MNPI in its performance of services for another client, suppliers must have controls in place to ensure that such information is not disclosed to Man Group.

### Financial Standards

Man Group engages with suppliers fairly, honestly and with professional integrity. We are committed to fair and reasonable payment practices, including acting with good faith in compliance with local requirements, and require the same high standards from our suppliers. Man Group is committed to keeping accurate and transparent financial records in line with applicable, generally accepted accounting principles, including the prohibition of any employees’ side arrangements with our suppliers.

### Environmental Standards

As reflected in our [CSR Brochure](#), on our [website](#), and in our commitment to reach net zero carbon in our global workplaces by 2030, Man Group recognises that sustainability must be an integral part

of any good business strategy. We will work closely with our suppliers to ensure they hold similar values and encourage our suppliers to hold themselves to similarly ambitious targets.

In line with the OECD Guidelines for Multinational Enterprises, we recommend that our suppliers give appropriate attention to environmental risks and issues within their strategies and operations. We expect our suppliers to be conscious of the impact they have on our environment and to be transparent in their intentions by continuously minimising their impact within a publicly available environmental policy, website or strategy document.

We strongly encourage our suppliers to include a commitment to reach carbon net zero as soon as is possible for their business, but at the latest by 2050 in line with regional government commitments, whilst conducting business in-line with the Paris Climate Accords.

#### Conservation, resource utilisation and reduction

Man Group encourages and promotes the reduction or elimination of all waste types, by practices such as materials substitution, conservation, reduction, recycling and re-using. Suppliers must consider principles such as Circular Economy, Closed Loop and Zero to Landfill in design, manufacture and recycling/disposal.

#### Our Communities

We encourage our suppliers to consider their impact on all of their stakeholders, including but not limited to their employees, clients, suppliers, and wider charitable partnerships within their communities.

#### Modern Slavery

Our suppliers must comply with all applicable human rights and employment laws in the jurisdictions they operate and should have due diligence processes in place to ensure this. We prohibit trafficked, forced and child labour and this is similarly expected from those we engage as suppliers. This includes complying with the requirements of the [Modern Slavery Act 2015](#).

#### Human Rights in the Workplace and Employment Conditions

Man Group is committed to promoting human rights around the world and we expect the same from our suppliers. Our suppliers must provide a safe working environment that, at a minimum, complies with all laws and regulations for their staff. Whilst a working environment will be tailored to the role employees undertake, all staff should have access to first aid, water and should be able to request facilities as needed e.g. a prayer room. Suppliers should ensure that employees' working hours are in accordance with local law and regulations. Staff should be able to contribute their opinions through an established channel and have the freedom to join labour unions (as part of their more general freedom of association).

#### Respect in the workplace

We are committed to respecting the needs, requirements and wellbeing of our staff. Our suppliers should operate in the same way, ensuring staff have access to the support and resources they need. Employers should provide an environment where staff are encouraged to raise concerns without the fear of retaliation, where there is a fair and transparent process through which complaints and grievances are heard, investigated as confidentially as possible and judged fairly with appropriate measures taken to adequately resolve matters. There should be a process by which to raise

complaints anonymously and where such matters remain confidential and anonymity is preserved throughout the process.

The health and wellbeing of staff is of paramount importance; all suppliers and contractors who work at Man Group have access to our wellbeing resources and events.

### Equal Opportunities

Man Group is opposed to discrimination in any form. We do not discriminate on the basis of race, colour, creed, national origin, ancestry, religion or belief, gender or gender identity, sexual orientation, age, disability, marriage or civil partnership, military or veteran status, pregnancy or maternity or any other legally protected category. We expect our suppliers to conduct their business in the same way, in compliance with the applicable legislation or regulations. We do not tolerate harassment of any kind and call out discriminatory behaviour; we expect the same of our suppliers as they provide a fair and inclusive workplace for their staff. All staff must have access to the same opportunities for development and promotion and there must be fairness and equity in recruitment, placement, selection and termination of staff.

### Wages and Benefits

We are committed to the fair remuneration of our staff that complies with all applicable wage laws, including those relating to minimum and overtime wages. We expect our suppliers to be equal to us in this approach and to hire at, or above, the living wage (or international equivalent per jurisdiction) as they engage staff.

Employees should be offered appropriate benefits that are reviewed and adapted as necessary.

### Health & Safety

Man Group expects its suppliers to provide safe working environments that comply with local policies, laws and regulations. Suppliers must ensure health and safety is effectively managed and have implemented programmes to ensure health and safety risks, issues and incidents are identified, addressed and improvements made in order to provide adequate facilities for the health and wellbeing of its workforce.

### Fair Competition and Antitrust

Man Group is committed to fair competition amongst our clients, suppliers, competitors and employees through the avoidance of manipulation, misrepresentation or concealment of facts, bid rigging, monopolisation, or the abuse of privilege or information. We expect our suppliers to adopt the same principles in turn.

We are cognisant that Supplier Codes of Conduct, such as this, should be thoughtful and not exclusive to small enterprises that may not have the infrastructure, staff or capacity to meet the same level of oversight or process as their larger competitors. Hence our Supplier Code of Conduct is focused upon our minimum expected standards.

### Governance & Risk Management

#### Operational Risk Management

Man Group aims to provide an uninterrupted and resilient service for our clients and to avoid negative consequences for them, our company and global financial markets more broadly. We consider operational risk management processes as key to ensuring this is achieved, and also key in

protecting our reputation. Further, clients and regulators expect us to identify and manage operational risk appropriately.

To support this, Man Group has established and embedded operational risk management processes throughout all areas of the company, including risk-based due diligence of our third parties. This encompasses the assessment of risks and controls, the production and review of management information, oversight and monitoring and defined routes of escalation. Governance structures are in place to ensure that risks are appropriately overseen and remedial actions taken where necessary, with ultimate responsibility residing with the Board.

Ineffective or misaligned practices from our suppliers could impact the likelihood of achieving these goals, resulting in financial losses, regulatory breaches, or reputational damage. Therefore, we expect suppliers to adopt a similar approach with appropriate processes to manage operational risk and that they ensure they have processes in place to maintain compliance with this Code of Conduct.

Suppliers are expected to escalate material operational risks that may impact Man Group or our clients in a timely manner, and Man Group reserves the right to review policies or procedures to confirm compliance with this Code of Conduct.

#### Business Continuity

Man Group operates a centrally managed Business Continuity Management (BCM) programme. The BCM programme focuses on business critical operations in order to deliver timely and effective incident identification, impact assessment, escalation, communication and resolution and provide our clients with resilient services. The resiliency efforts extend beyond the assets of Man Group to the third-party service providers that support our business processes. Man Group expects its suppliers to manage business continuity risk to ensure availability of critical services to Man Group during a disaster event. It is a requirement that each supplier maintain a comprehensive business continuity program that addresses the loss of the facilities, technology, human capital, or suppliers necessary to support Man Group.

#### Data Protection, Confidentiality and Information Security

Man Group takes the protection of data, business and client confidentiality, and information security very seriously, and we expect all our suppliers to take appropriate steps in order to support Man Group in maintaining appropriate levels of privacy and security. To that end, we require all suppliers to notify Man Group in the event of an information security incident or breach.