



**Mortgage
Advice Bureau**

Supplier Code of Conduct

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Introduction

Mortgage Advice Bureau (MAB) is one of the UK's leading consumer intermediary brands and specialist appointed representative networks for mortgage intermediaries. MAB's Appointed Representatives ("ARs") and their advisers specialise in providing mortgage advice to customers, as well as advice on protection and general insurance products, enabling people to buy their own homes, re-finance and help them fulfil their aspirations by making key financial moments in life a simple, happy and reassuring experience.

MAB has a responsibility to uphold business integrity by striving to improve the service that we provide, making responsible decisions in how we manage the business, and actively managing the social and environmental impacts of what we do to help individuals, communities, businesses and economies progress and grow.

Our Supplier Code of Conduct sets out MAB's priorities for a sustainable and ethical supply chain and the standards required from Suppliers to meet these priorities. All MAB Suppliers including any sub-contractors must comply with the Code. MAB will periodically review this Code and make revisions when needed, which we expect suppliers to adopt or work towards. Suppliers failing to comply with MAB's code of conduct will be taken off MAB approved supplier panel and will therefore not be included in any quotations, proposal requests or tender requirements.

Scope

"Supplier" means any firm or individual (including third parties sub-contracted by a supplier) that provides a product or service to or on behalf of MAB or to any of its clients either directly or indirectly.

This Code of Conduct applies to all Suppliers providing goods, services or activities to any of the MAB Group of companies and its affiliates (including agents and intermediaries).

The provisions of this Code of Conduct are in addition to and not in lieu of any legal agreement or contract. We reserve the right to review Suppliers' policies, procedures and supporting documentation related to compliance with this Code of Conduct.

Policy

MAB is committed to doing business with organizations that share our commitment to treat all stakeholders fairly and ethically. We also expect our Suppliers to share our values and conduct themselves in a manner that is aligned with MAB's values and our expected behaviours.

This Code of Conduct is applicable to all suppliers appointed by any MAB function, business or individual working on behalf of MAB. Any supplier that has any commercial dealings with MAB, and any of their subcontractors, must state compliance with this Code.

An over-arching principle of the Code is that our Suppliers comply, at all times, with all applicable laws, regulations and standards within the geographies in which they operate.

Requirements

Ethics and Sustainability

It is MAB Group's policy to conduct its business in an honest and ethical manner. All employees, appointed representatives, suppliers and contractors are expected to always maintain the highest professional standards. It takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity wherever it operates and implementing and enforcing effective systems to counter bribery and corruption. MAB Group does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, suppliers, consultants or any person or companies acting for it or on its behalf. For reference MAB's Anti-Bribery & Corruption Policy can be found on the company website: <https://www.mortgageadvicebureau.com/mab-group-anti-bribery-and-corruption-policy-statement/>

At MAB we expect our suppliers:

- To support fair-trade and ethical sourcing practices relevant to the commodity or service provided.
- To respect the human rights of the people and communities in which they operate and should strive to improve the lives of the people within these communities.
- To provide evidence that they have implemented due diligence procedures to manage ethical issues within their supply chain, including all labour-related processes to ensure they comply with laws on slavery and human trafficking.
- Not discriminate against any individual or group on the grounds of age, race, caste, ethnic or national origin, colour, mental or physical health conditions, disability, pregnancy, parent or carer role, gender, gender expression, gender identity, sexual orientation, marital status or other domestic circumstances, employment status, working hours or other flexible working, religion or belief.
- To ensure equality, diversity and inclusion in the workplace and community and to offer fair treatment in every aspect of the working life.
- To provide a safe and healthy working environment by minimising as far as reasonably practical the hazards inherent in the working environment and minimise risk of exposure to harmful materials, machinery or operations.
- To operate and maintain an effective safety policy to protect employees and suppliers.
- Comply with all applicable environmental, occupational health and safety regulations and international conventions on environmental standards.
- Minimise negative impact on biodiversity, climate change and water scarcity.
- Reduce waste, air pollution, and apply energy efficient and environmentally friendly technologies.



Figure 1 MAB's principals of ethical and sustainable Supply Chain

Social

MAB already serves a great social purpose, helping customers to buy and re-finance their homes as well as providing customers with valuable protection products and our focus on making a positive societal contribution extends to all our stakeholders.

MAB supports the protection and improvement of human rights around the world and our approach is guided by fundamental principles such as those set out in the International Bill of Human Rights, the UN Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. MAB expects suppliers to respect the human rights of their employees and suppliers to comply with all relevant legislation, regulations and directives in the countries and communities in which they operate.

We expect our supplier to treat their employees with respect, promote an inclusive work environment and prohibit discrimination, unequal treatment, harassment, abuse or inhumane, treatment against anyone for example on the grounds of an individual's ethnic descent or national origin, race or colour, religion or ideology, gender, sexual orientation, gender identity and/or expression, age, physical or mental disability, political or union affiliation, citizenship, maternity, marital status, or any other characteristic protected by applicable law.

Labour

We are expecting all our supplier at MAB, direct or indirect, to comply with the following principles:

- Avoid causing or contributing to adverse human rights impacts and address any when they occur.
- Meet or exceed the standards required by applicable legislation relating to employment and labour.
- Prohibit the use of all types of slavery and forced labour and human trafficking within their operations and their supply chain.
- Not employ children, prohibit the use of child labour in their operations and supply chain, and take immediate and effective measures to stop child labour as a matter of urgency.

- Ensure that wages meet legally mandated minimums and industry standards without unauthorised deductions.
- Ensure that working hours are in accordance with local regulation and industry practice and voluntary overtime is at manageable levels.
- Not prevent workers from organising and joining associations such as labour or trade unions (where permitted by law).
- Must provide clear and consistent disciplinary and grievance procedures that include provisions prohibiting mental, physical or verbal abuse and protect workers against retaliation.
- Must protect the rights of temporary workers.
- Provide safe working conditions where issues, incidents and non-compliance are identified and addressed
- Have appropriate due diligence procedures to identify and manage human rights considerations within their supply chain.
- Depending on size and location of the company have a modern slavery and human trafficking statement. MAB makes an annual statement relating to its actions on modern slavery and human trafficking which can be found on MAB's company webpage: <https://www.mortgageadvicebureau.com/modern-slavery-and-human-trafficking/>

Health and Safety

MAB's Suppliers have to provide a safe working environment which meets industry standards. Furthermore, suppliers have to abide with local laws and regulations and ensure health and safety is effectively managed, so that health and safety risks, issues, incidents and non-compliance are identified and addressed to provide adequate facilities and to ensure the health and well-being of its workforce and wider community is protected.

Diversity and Inclusion

MAB is committed to promote diversity and to create an open and inclusive culture within MAB as we believe this is essential to our business success and integral to achieve our strategic objectives. We aim to achieve higher standards than the minimum set out in the Equality Act 2010 and we wish to trade with like-minded third parties and therefore expect our suppliers to:

- Meet or exceed the requirements of all applicable equality legislation.
- Not discriminate against any individual or group on the grounds of age, race, caste, ethnic or national origin, colour, mental or physical health conditions, disability, pregnancy, parent or carer role, gender, gender expression, gender identity, sexual orientation, marital status or other domestic circumstances, employment status, working hours or other flexible working, religion or belief.
- Actively demonstrate commitment to equality, diversity and inclusion through all aspects of workplace operations and management giving clear consideration to equality of opportunity in employment, skill development and career advancement, particularly with under-represented segments of society in the area of local operations.
- Take Diversity and Inclusion into consideration in the widest context when providing services to MAB.
- Actively drive management of downstream supply chains as part of their own commitment so

that the principles of diversity and inclusion are encouraged through the global supply chain.

Data Protection & Management

Where MAB and its associated business' data is processed, transmitted, stored, or accessed by our third-party suppliers, we expect that this is managed and controlled in line with the requirements of the Data Protection Act 2018 and other applicable laws and regulations in line with data protection and record retention standards in the financial industry. Our third-party suppliers are expected to have in place appropriate and proportionate control frameworks to ensure compliance with data protection principles. Where breaches are identified, we expect these to be brought to MAB's attention immediately.

Environmental

MAB has a role to play in addressing the impacts of climate change and reducing our environmental footprint is an important priority for us. As a company, we are not only focussed on reducing our direct carbon emissions, but also on delivering a positive impact on all our stakeholders and the wider society. With the housing sector representing circa 20% of carbon emissions in the UK, we believe we have a significant role to play in contributing towards the UK's overall Net Zero targets by 2050.

MAB requires its Suppliers to support sound environmental management principles and reduce their impact on the environment within which they operate in accordance with the following standards:

- Suppliers must have a written environmental/sustainability policy appropriate to the size and nature of the supplier's operations that addresses all significant environmental impacts.
- Suppliers must have an environmental management programme/system in place to implement their environmental policy and address significant environmental impact of the goods or services they provide.
- Suppliers must abide by all applicable legislation and regulations related to the protection of the environment.
- Suppliers must have a clear ambition statement in respect of their emissions reduction and have a plan that supports the UK's commitment to Net Zero targets.

Economic

MAB has embedded mission, vision and values statements into our 'Mabology' behaviours framework which sets out our business principles and code of conduct and reflects our purpose and values and the high standards of conduct we expect. We believe that our relationships with all stakeholders should be based on the principle of fair and honest dealings, whilst promoting fair and sustainable development.

Therefore, our Suppliers must:

- Have a Code of Business Standards or a similar policy, that sets out the basic principles they operate under.
- Comply with applicable national and international laws and regulations, including international sanctions policy and regulations.

- Ensure that policies are in place to stop fraud, money laundering, bribery and corruption and refrain from offering gifts and entertainment to MAB employees. For reference MAB's Whistleblowing and Anti-Bribery & Corruption Policy can be found on MAB's webpage: <https://www.mortgageadvicebureau.com/mab-group-whistleblowing-policy-statement/>
- Have reasonable and lawful payment policies with their own suppliers and subcontractors, that do not permit unfair practices such as 'pay when paid' terms and unilateral extension of payment terms.

Governance

MAB values the opportunity to work in partnership with suppliers to address common sustainability challenges and ensure that the management of our supply chain leads to improved sustainability.

It is essential that suppliers have good governance and management processes in place to ensure they and their own suppliers are able to comply fully with this Code when providing goods and services to MAB, as it is appropriate to the size of the supplier's operations, their location and the nature of the goods and services they provide.

Our Suppliers must:

- Have sufficient management systems and governance in place to enable compliance with this Code
- Respond fully to any requests for information, compliance or audit requirements and deal with MAB in a co-operative and positive manner

Compliance

Our aim is to collaborate with our suppliers that have committed to this Supplier Code of Conduct or to their own policy of equivalent or higher standards.

When engaging and reviewing a potential new supplier relationship, applicability of all elements of this Code of Conduct will be evaluated taking into account the size of the supplier's operations, their geographic location and the nature of the goods and services they provide.

If a supplier is unable to accept or cannot adhere to this Supplier Code of Conduct, MAB will seek in the first instance to work with the supplier to develop a plan for change or improvement to make a collaboration possible. Unwillingness to accept or adhere to the Code without a clear or valid justification, nor openness to work on improvements, could lead to a supplier's onboarding being declined.

MAB reserves the right to review the supplier's policies, procedures or any other document related to adherence to this Code. In some cases, MAB may require an on-line or on-site audit of a supplier's adherence to this Code.

I confirm that I have read MAB's supplier Code of Conduct and acknowledge the requirements contained within.

Company:

Print name:

Signature:

Job title / Position:

Date: