



LOMBARD ODIER
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Lombard Odier Group Supplier Code of Conduct

Introduction

Bank Lombard Odier & Co Ltd and its affiliates (hereinafter collectively referred to as “Lombard Odier” or “the Group” or “we”) are committed to managing their commercial, social and environmental impact in a sustainable manner. Lombard Odier recognizes that it is part of a broader social and environmental ecosystem, and believes that its interests as a business and those of the society in which it operates must be aligned.

Lombard Odier is a signatory/member of several sustainability frameworks and certifications, such as the UN Global Compact and the UN Principles for Responsible Banking which help us to further define our sustainability roadmap as we integrate their values in our sustainability strategy. Lombard Odier is also B Corp certified, a certification granted to companies with the highest corporate sustainability standards and integration. Lombard Odier aligns itself with those who encourage the transition to a more sustainable economic model, and our commitment to these frameworks, and related reporting requirements, helps us to further integrate sustainability in a transparent manner in our businesses and operations.

Lombard Odier therefore recognises the importance of a sustainable supply chain and aims to engage with third party companies and individuals supplying products or services to Lombard Odier (“Suppliers”) that have adopted strong policies and programs in terms of social and environmental responsibility as well as corporate governance principles.

This Supplier Code of Conduct (the “Code”) aims to ensure the alignment of our Suppliers with Lombard Odier’s sustainability values and commitments and outlines the standards with which Lombard Odier expects its Suppliers to comply.

This Code applies to all Suppliers of Lombard Odier and their subsidiaries. While Lombard Odier recognises that supply chain sustainability is a work in progress at many Suppliers, the Suppliers are expected to ensure that all their own suppliers, subcontractors, employees and agents adhere to the principles outlined in this Code.

In addition to this Code, all Suppliers must comply with all applicable laws and regulations.

Please read the important information at the end of the document.

Human and Labour Rights

The Supplier is required to

- Respect human rights as defined in the United Nations' Universal Declaration of Human Rights and its subsequent human rights treaties, and not be complicit in human rights violations within its sphere of influence;
- Strive to put in place adequate remedial mechanisms in case of any human rights violations;
- Respect the International Labour Organization's fundamental standards on child labour: ILO Convention 138 (Minimum Age Convention) and ILO Convention 182 (Worst Forms of Child Labour Convention);
- Seek to recognize employees' right to organize and bargain collectively;
- Endeavour not to discriminate against any employee and to treat all employees fairly and respectfully; and
- Use its best efforts to provide a safe working environment.
- In addition, if the Supplier is a UK company subject to the UK Modern Slavery Act 2015, it must provide Lombard Odier with a copy or link to its Modern Slavery Statement.

Ethical Conduct

Lombard Odier prohibits active and passive bribery or corruption in any form whatsoever, direct or indirect, for example:

- Offering, promising or giving any undue advantage in order to obtain or retain a business;
- Soliciting, suggesting or accepting any undue advantage to influence a business decision or obtain unauthorized access to confidential information; or
- Making or accepting bribes (kickbacks)
- Making or accepting illegal facilitation payments

Environmental Impact

The Supplier is required to:

- Fulfill all environmental requirements defined in mandatory laws, regulations, norms and specific industrial environmental regulations; in particular
 - Strive to use resources efficiently and ensure adequate operation control minimizing adverse environmental impacts;
 - Take steps to reduce their Greenhouse Gas (GHG) emissions and to protect biodiversity and sensitive habitats on which they have a material impact; and
 - Ensure compliance of air emissions from operations with mandatory legal requirements, practice good water stewardship, meet legal requirements relating to the use of hazardous substances, and ensure the safe handling and transportation of waste.

We encourage our Suppliers to disclose energy and emissions management policies and performance, and to provide, when available, an analysis of the Supplier's environmental performance, with the aim of reducing the environmental impact of its operations.

Other Rules

Suppliers and their staff must not use any of Lombard Odier's trademarks, names and logos for marketing or similar purposes (including without limitation mentioning Lombard Odier as a customer), without Lombard Odier's prior written consent. Suppliers must keep their relationship with Lombard Odier confidential unless Lombard Odier has approved disclosure in advance and in writing.

Suppliers must comply with all applicable data protection laws and regulations.

Suppliers are required to protect and use Lombard Odier property, supplies, facilities, equipment and/or other assets responsibly, with due care and only when and to the extent authorised. Suppliers working on Lombard Odier owned or leased property must comply with all relevant data protection, legal, compliance, health and safety, fire and security regulations, policies, plans and procedures for that site.

General Requirements

The Supplier agrees to communicate to Lombard Odier any ratings, certifications and environmental or social labels issued by a certification body or rating agency.

If the Supplier does not meet the principles and requirements set out in this Code to a degree that this could negatively affect the activities and reputation of Lombard Odier, Lombard Odier may be obliged to reconsider its relationship with the Supplier. When possible, Lombard Odier may offer guidance specifying which issues need to be improved, in order to support the Supplier's transition toward sustainable business practices.

The Supplier is required to immediately report any breach or failure to comply with this Code to Lombard Odier's Procurement Group.

IMPORTANT INFORMATION

This report concerns all entities of the Lombard Odier Group. It is not intended for distribution, publication, or use in any jurisdiction where such distribution, publication, or use would be unlawful, nor is it aimed at any person or entity to whom it would be unlawful to address such a report.

United States: Neither this document nor any copy thereof may be sent to, taken into, or distributed in the United States or given to any US person.

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Data protection:

You may be receiving this communication because you have provided us with your contact details. If this is the case, note that we may process your personal data for direct marketing purposes. If you wish to object to this processing, please address your objection to the Group's Data Protection Officer: Bank Lombard Odier & Co Ltd, Group Data Protection Officer, 11, Rue de la Corraterie, 1204 Geneva, Switzerland. E-Mail: group-dataprotection@lombardodier.com. For more information on Lombard Odier's data protection policy, please refer to www.lombardodier.com/privacy-policy.

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