

## FT Group Supplier Code of Conduct

FT Group<sup>1</sup> is committed to upholding the highest standards of ethics, integrity and corporate responsibility in all our operations, including within our supply chain. We therefore require our suppliers to meet the following minimum expectations.

### Privacy and Information Security

#### **Confidentiality**

Suppliers must safeguard all proprietary and confidential information provided to them by FT Group and ensure it is only shared with authorised individuals.

#### **Data Protection and Privacy**

Suppliers must safeguard any Personal Data that is provided to them by or on behalf of FT Group. Suppliers must report any breaches to FT Group promptly and with sufficient detail to enable FT Group to take any appropriate action.

#### **Cybersecurity**

Suppliers must maintain appropriate levels of cybersecurity and information security, to ensure continuity of service to FT Group and appropriate protection of FT Group confidential information and personal data. If granted access to FT Group systems, suppliers must follow FT Group policies applicable to those systems.

### Environmental, Social and Governance

#### **Modern Slavery and Human Rights**

Suppliers must not engage in any form of modern slavery, forced labour or child labour, and must respect human rights and provide a safe working environment free from all forms of discrimination, harassment, victimisation and abuse. Suppliers must undertake appropriate checks to identify and prevent modern slavery and human rights abuses in their supply chain.

#### **Diversity and Equity**

Suppliers must comply with all equality legislation applicable in their territories of operation. Suppliers should promote inclusivity and improved diversity and access to opportunity for all individuals in their operations regardless of age, socioeconomic status, disability, gender, gender identity, race/ethnicity, sexual orientation, faith or any other characteristic. Discrimination in any form is not tolerated.

#### **Sustainability**

Suppliers must operate environmentally sustainable business practices, aim to control and minimise their impact on the environment, and promote sustainable and environmentally friendly practices in their supply chain. FT Group encourages suppliers to collect information on their carbon emissions data and to set targets for reducing greenhouse gas emissions across their operations.

#### **Anti-Bribery and Corruption**

Suppliers must not engage in any form of bribery, corruption or unethical practices.

#### **Health and Safety**

Suppliers must provide a safe and healthy working environment for their employees and those involved in their operations, and must have processes to ensure that any safety hazards or incidents affecting their operations are appropriately recorded and addressed.

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<sup>1</sup> Financial Times Group Ltd and all its wholly and majority owned entities.

### **Fair Competition**

Suppliers must not engage in any practices that are anti-competitive or which limit competition through illegal or unfair means.

### **Conflicts of Interest**

Suppliers must disclose any conflicts of interest they are aware of during any supplier selection or onboarding process, or that arise during their business relationship with FT Group.

## **Financial Controls**

### **Tax Evasion**

Suppliers must not engage in any form of tax evasion, including dishonest tax reporting. FT Group has a zero tolerance approach towards the facilitation of tax evasion by anyone associated with FT Group.

### **Sanctions**

Suppliers (or individuals or entities associated with them) must not be subject to any applicable trade or economic sanctions imposed by the United Nations, European Union, United Kingdom, Hong Kong or United States of America. If suppliers become subject to applicable sanctions during the course of their business relationship with FT Group they must promptly alert FT Group.

## **General**

### **Compliance with Laws and Regulations**

Suppliers must comply with all laws and regulations applicable to their business operations and to the products or services they are providing to FT Group. This includes, but is not limited to, any laws or regulations relating to matters set out in this Code.

### **Business Continuity**

Suppliers must have appropriate contingency plans in place to address disruptions in their operations and ensure minimal impact on FT Group. Suppliers must maintain adequate insurance coverage throughout the duration of the engagement or relevant period. Any withdrawal (or material reduction) of insurance cover must be notified to the FT.

### **Editorial Freedom**

Suppliers must not act in a way that seeks to restrict or interfere with FT Group's editorial freedom. Suppliers involved in content production must commit to ensuring the accuracy, fairness, and integrity of the content they produce and its compliance with regulatory standards.

### **Publicity**

FT Group is an internationally renowned news organisation that must protect its brand from misuse. Suppliers must not use any FT Group brand name or logo for publicity or promotional purposes without first obtaining the explicit consent of the FT Group entity they are contracting with.

### **Whistleblowing**

Suppliers must have whistleblowing procedures in place which allow employees to report any incidents or concerns anonymously, safely and without repercussion.

### **Compliance with this Code**

Suppliers must ensure the principles of this Code are reflected across their supply chain. Suppliers must promptly inform FT Group of any breaches of this Code that occur while providing products or services to us. To report any breaches, or if you have any questions or concerns about this Code, please contact FT Group via [compliance@ft.com](mailto:compliance@ft.com).

Last updated 29 October 2024