

# Guideline for responsible procurement

This document has been amended from the original internal version for public use. Personal and confidential information has been removed

## Table of Contents

<b>1. Purpose and Governance</b>	3
<b>2. Expectations towards suppliers</b>	3
2.1. Legal and regulatory requirements	3
2.2. Conflicts of interest/corruption	3
2.3. Environmental protection	3
2.4. Human rights	3
2.5. Child and forced labor	3
2.6. Modern slavery and human trafficking	3
2.7. Conflict minerals and metals	3
2.8. Respect at the workplace	3
2.9. Working conditions	3
2.10. Non-discrimination	3
2.11. Freedom of association	3
2.12. Health and safety	4
<b>3. Compliance and remedies</b>	4
<b>4. Entry into force</b>	4

## List of abbreviations

<b>CO</b>	Swiss Code of Obligations
<b>CSC</b>	Vontobel Corporate Sustainability Committee
<b>ILO</b>	International Labour Organization
<b>UN</b>	United Nations
<b>UNCAC</b>	United Nations Convention Against Corruption

## 1. Purpose and Governance

Vontobel's six Sustainability Commitments – defined in 2022 by our Board of Directors in collaboration with the Executive Committee – set out the key levers we have as an investment firm and as a corporate citizen to deliver on the promise we have made based on our Sustainability Positioning.

We work systematically across all our client segments and Centers of Excellence to deliver on these commitments and, in doing so, we put great emphasis on high environmental and social standards and expect the same from our business partners.

The guideline, which is based on the ten principles of the United Nations Global Compact, provides the benchmark for responsible management that Vontobel expects from its suppliers. The principles of the UN Global Compact are in turn based on the Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption (UNCAC).

Vontobel expects its suppliers to comply with these principles and to ensure that they are also observed by their own suppliers, subcontractors and employees.

As a globally active investment firm, we regularly review our commitments for necessary adjustments in line with the development of international standards or regulatory expectations. The Vontobel Corporate Sustainability Committee is informed about material changes to this guideline.

Acceptance of this guideline is part of the supplier onboarding process, as stated in the related Group-wide procurement policy.

## 2. Expectations towards suppliers

### 2.1. Legal and regulatory requirements

Suppliers must comply with all applicable laws, regulatory requirements, and standards in the countries in which they operate. Of particular importance are regulations and laws on environmental protection, labor law, competition, anti-corruption, money laundering, taxes and accounting standards.

Vontobel expects its suppliers to comply with the Swiss Code of Obligations Art. 964 j-l and the specifying Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO).

### 2.2. Conflicts of interest/corruption

Suppliers must not promise, solicit, give, or accept premiums, gifts, or favors. The direct or indirect offer of such benefits, even if they are not actually given, is not permitted. Vontobel expects its suppliers to provide appropriate transparency and disclosure of potential or actual conflicts of interest prior to awarding the contract, as well as a commitment to avoid activities in the course of business that may lead to a conflict of interest.

### 2.3. Environmental protection

Suppliers whose products and services have significant negative impacts on the environment must have policies and systems in place to minimize these impacts. The principles of careful use of resources, minimization of environmental impact, and the development of products and technologies aligned with these principles shall be central to this.

### 2.4. Human rights

Suppliers respect the internationally proclaimed Universal Declaration of Human Rights of the UN, promote its observance within their sphere of influence, and ensure that no human rights violations take place in their organization.

### 2.5. Child and forced labor

Suppliers shall not employ children below the minimum age specified by applicable laws. They shall also check whether there are reasonable grounds to suspect child labor in their supply chains. They shall ensure that no form of forced, bonded, or involuntary labor is used. Every employee should work of their own free will.

### 2.6. Modern slavery and human trafficking

We expect our suppliers and their subcontractors to prohibit slavery and human trafficking and to be able to demonstrate effective procedures to ensure that slavery, exploitation, or human trafficking are excluded from their supply chain.

### 2.7. Conflict minerals and metals

Vontobel neither directly imports nor processes minerals or metals. Third parties involved in sourcing or storage of precious metals on behalf of Vontobel or our clients are subject to the due diligence and transparency requirements under Art. 964 j-l of the Swiss CO and are expected to comply with the respective provisions.

### 2.8. Respect at the workplace

Suppliers shall treat their employees with respect and ensure a work culture that prevents physical violence or punishment, belittling, threats, harassment and bullying.

### 2.9. Working conditions

Wages, benefits and working hours of the employees of all suppliers shall at least meet the minimum legal requirements and shall also reflect local practices.

### 2.10. Non-discrimination

We embrace diversity of thought and expect our suppliers to promote equal opportunities and fairness in their workforce/workplace and not to discriminate in employment or recruitment on the basis of age, gender or sexual orientation, disability, origin, ethnic background, physical ability or religion.

### 2.11. Freedom of association

Suppliers shall recognize the right of their employees to freedom of association and to bargain collectively, at least to the extent permitted by applicable laws.

## **2.12. Health and safety**

Suppliers shall take appropriate measures to ensure that employees work in a safe and healthy work environment, including regular training on safety issues.

## **3. Compliance and remedies**

Vontobel reserves the right to check compliance with this guideline using appropriate measures and to request corresponding information from the supplier.

Vontobel is aware that the same practices do not apply everywhere, nor is the enforcement of legal provisions guaranteed to the same extent everywhere. We expect suppliers to proactively inform Vontobel about any breaches of the obligations in this guideline. If there are differences between the supplier's principles and the principles formulated by Vontobel, Vontobel will work towards ensuring that the principles are better taken into account and will discuss ways and means of doing so with the supplier. If the principles are violated, Vontobel reserves the right to exclude the supplier from further cooperation.

Vontobel encourages all stakeholders to report any suspected fraudulent or unethical behavior by Vontobel or its employees via our [whistleblowing system](#).

## **4. Entry into force**

The guideline for responsible procurement at Vontobel has originally been implemented in 2010 and will be reviewed at least every 3 years.

October 2021: Update

April 2022: Update

December 2025: Update

