

Supplier code of conduct

About us

Canaccord Wealth is one of the leading independent wealth managers in the UK and Europe with offices nationwide and in the Crown Dependencies.

At Canaccord Wealth, we believe our clients deserve a wealth manager that goes above and beyond and are committed to helping them enjoy their wealth to the fullest.

From making sure their savings last, to growing the value of their investments. Whatever the goal, the team is fully focused on delivering excellent performance and service. Our clients come to us with a range of challenges, needs, and circumstances and we support each and every person with the same level of attentiveness, proactivity, and expertise.

Our 4A values (accountable, aligned, ambitious and approachable) set the standard for all of us at Canaccord Wealth. They guide our actions and decisions so that we achieve the results we want, for ourselves and our clients.

To maintain this high standard, we ensure that our suppliers consistently meet our expectations and are appropriately monitored. This commitment to excellence underpins everything we do, ensuring that we deliver the best possible outcomes for our clients.

What does our code of conduct mean and what are our expectations on you as a supplier?

At Canaccord Wealth, we strive to promote a culture of integrity and accountability and are committed to working with our suppliers to ensure that these values are met and the standards expected are communicated clearly.

The Supplier code of conduct applies to all Canaccord Wealth suppliers of products or services and, to their employees, agents, consultants and subcontractors (collectively 'suppliers' and/or 'you').

Via our comprehensive onboarding and vendor monitoring processes, we seek assurance that suppliers embrace the same values that we do, act in accordance with the code, and at a minimum require all suppliers to comply with applicable laws and regulations within the geographies where they operate.

Please refer to the following pages for the principles and behaviours we expect all our suppliers to adhere to.

Code of conduct principles

Human Rights

We expect all our Suppliers to respect the human rights of their own workforce, their supply chain, and their customers.

- To respect the human rights of their employees and to comply with all relevant legislation, regulations, and directives, including awareness and mitigation of the risk of modern slavery in the countries and communities in which you operate and, where relevant, compliance with the UK Modern Slavery Act 2015
- To prohibit forced labour (slavery) and human trafficking in their supply chain and give all employees the right and ability to leave employment if they choose
- Suppliers will not use child labour in any aspect of their operations. The term 'child' refers to any person under the minimum age for employment in the relevant jurisdiction
- To ensure working hours are in accordance with local regulation and industry practice and voluntary overtime is not excessive
- Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and any legally mandated benefits. Suppliers will compensate workers for overtime consistent with applicable local law
- Treat all employees fairly and not harass or discriminate against any group in their employment practices, in particular on the basis of gender, race, age, sexual orientation, gender identity, disability, faith, or family circumstances
- Suppliers will have a defined process that it communicates to their employees to enable them to raise any concerns without fear of retaliation.

Health and safety

Suppliers must be committed to ensuring the safety, health, and welfare of their employees at work, along with others who may be affected by their activities. This includes the management of safety, health, and the environment.

- Suppliers must comply with all relevant health and safety laws and regulations, both in letter and in spirit, in all the countries in which they operate

- Suppliers must provide all their employees with adequate information and instruction on health and safety matters and enable their employees to meet their responsibilities for the maintenance of a safe and healthy workplace.

Equity, diversity and inclusion

Canaccord Wealth is committed to equality and diversity in its organisation, and this is demonstrated by promoting a culture of equality of opportunity that actively values difference, providing an inclusive workplace and eliminating any unfair or unlawful discrimination. We expect suppliers to:

- Not engage in discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, neural diversity, pregnancy, religion, political affiliation, union membership, or marital status, in their employment practices
- Treat each person with dignity and respect and afford them equal opportunity to the fullest extent provided by law and not discriminate in hiring and employment practices based on characteristics that are protected by local laws.

Environmental

All businesses have a responsibility to be proactively identifying, managing, and reducing their environmental impact. This includes greenhouse gas emissions, energy consumption, air and water pollution, water usage, waste (including hazardous), hazardous chemicals and impacts on nature and biodiversity.

Canaccord Wealth is committed to reducing the impact of its operations on the natural environment and working with its suppliers to do the same.

- Each supplier must comply with all applicable environmental laws, regulations, and standards in order to minimize their adverse impact on the environment
- Suppliers are strongly encouraged to use renewable energy sources whenever possible
- Suppliers must also endeavour to conserve natural resources, including air, water, and energy, protect biodiversity, recycle, and reduce or eliminate waste and the use of hazardous substances
- We encourage suppliers to have a written environmental sustainability policy which is appropriate and relevant for their organisation, which includes how their organisation is working to measure and reduce its environmental impacts, considering the lifecycle of the supplier's products and services, and support the transition to a low-carbon economy.

Ethics

Suppliers must demonstrate their commitment to acting ethically and with integrity in all business dealings and relationships.

- Suppliers shall not engage in any form of bribery or corruption or undertake any action that contravenes Canaccord Wealth's policy on combating bribery and corruption or, where directly applicable, the UK's Bribery Act 2010. Furthermore, suppliers shall not

(either directly or through a third party) offer, give, or receive bribes, facilitation payments or inducements for any purpose whatsoever

- Suppliers shall have procedures in place to ensure its continuing compliance with the UK Bribery Act 2010 (or such other equivalent legislation as is applicable to it in its jurisdiction)
- Canaccord Wealth expects to be notified of any material financial crime issues (for example, instances of money laundering, terrorist financing, proliferation financing, sanctions, tax evasion and fraud) where giving such notification does not risk breaching applicable laws or prejudicing any investigation
- Suppliers must avoid any situation or relationship that may involve an inappropriate conflict of interests or the appearance of a conflict with the interests either with or amongst Canaccord Wealth, its employees, its clients or any third-party
- Suppliers must not offer or provide gifts, hospitality or entertainment to any Canaccord Wealth employee, or the family member of any Canaccord Wealth employee, which exceed the de minimis value as is notified to the supplier (or is provided on request)
- Suppliers must disclose to Canaccord Wealth any event that raises a concern that a conflict of interest exists or that impedes the Supplier's ability to act objectively on behalf of Canaccord Wealth, unless doing so would risk contravening applicable laws.

Business continuity and resilience

Canaccord Wealth expects its suppliers to manage business continuity risks in terms of ensuring availability of critical services to us during a disaster event.

- Suppliers should have plans in place for their business to continue with minimal interruption in the event of an emergency, crisis situation, natural disaster or terrorist/ security related event
- Suppliers should ensure this extends to the wider supply chain including subcontractors used to support the delivery of services to us
- Suppliers are expected to share these plans as requested by Canaccord Wealth.

Supply chain

Canaccord Wealth expects its suppliers to manage their supply chain risks and have adequate oversight of their subcontractors and suppliers in their supply-chain.

- Suppliers must ensure they have robust processes and procedures in place to ensure any subcontractors and third parties with whom they engage, comply with all applicable human rights, employment law practices and ethical business practices
- We encourage our suppliers to extend the principles of this code of conduct to their supply chain.

Confidentiality and privacy

Canaccord Wealth expects any information received by a supplier from Canaccord Wealth to be held securely with appropriate technical and organisational security in place to safeguard that information to ensure there is no improper, unlawful or unreasonable disclosure of the data.

- Suppliers must comply with all data protection requirements that are directly applicable to them
- Where a supplier is processing personal data, as a Data Processor, on Canaccord Wealth's behalf, the supplier must enter into appropriate contractual terms governing such data processing (including, among other things, in relation to appointment of sub-processors, audit rights and transfers of personal data outside the UK or European Economic Area (EEA)), in each case as required by applicable data protection laws
- Dependent upon the precise circumstances of each engagement, suppliers understand that they may be subject to a general duty of confidentiality to Canaccord Wealth, its clients or to other third parties, that is additional to any specific contractual duties of confidentiality set out within any agreement.

Community involvement

Canaccord Wealth wants to have a positive impact in the communities we are part of and empower our people to give back to their communities. We are involved in charitable activities both at corporate, office and individual level.

- We encourage our suppliers to have an active community involvement programme and to recognise the social imperatives of the communities in which they operate.

Our commitment to you

We will commit to:

- Working in partnership with you to share expertise in developing innovative, high-quality products and services and in effectively managing risk
- Building strong, collaborative relationships with our strategic suppliers and helping them to understand the environment in which we operate so that they can meet our needs and our customers' needs
- Ensuring we support an inclusive, accessible, and ethical supply chain
- Supporting viable opportunities to reduce environmental and climate impacts and to preserve our planet and natural resources.

Complying with this code

Self-monitoring, compliance and audit

We take adherence to this code seriously; however, we recognise that some smaller businesses may have concerns about meeting all or part of it. We are open to discussions with those businesses and would encourage them to engage with us.

This code outlines the minimum conduct standards that we expect suppliers to follow when doing business with us, and we expect suppliers to be able to demonstrate that they are adhering to this code if we request this.

- The supplier should inform their Canaccord Wealth point of contact (as soon as practicable), if: (a) there is a breach of the code; or (b) it is not able to comply with this code for the duration of its relationship with Canaccord Wealth
- The supplier may be required to provide written acknowledgement of their adherence to this code, and Canaccord Wealth (or a designated firm) may conduct audits or assessments to verify the supplier's compliance with this code
- Canaccord Wealth reserves the right to take appropriate steps regarding our relationship with you if there is a reason for concern. This may include non-adherence to international principles, failure to correct violations, or displaying patterns of non-compliance with these standards.

Speak up

If you have any concerns about actions or decisions made that go against the principles and standards set out in this code, please inform your contact at Canaccord Wealth.

Our independent and confidential Integrity line, provided by Navex Global, operates both a toll-free telephone line and a website which is accessible in all countries where we conduct business, 24 hours a day and 365 days a year.

Regional telephone numbers are available on the following website: [EthicsPoint - Canaccord Genuity Group Inc.](#)

Updates to this code

We may update this code periodically and will distribute accordingly to all suppliers. It is the responsibility of each supplier to ensure that these new iterations of the document are read, understood and complied with.

Canaccord Genuity Group Inc. is incorporated under the laws of the Province of British Columbia with incorporation number BC0787108. Its registered address is 1000 - 840 Howe Street, Vancouver, B.C., Canada V6Z 2M1. It is listed on the Toronto Stock Exchange.

Canaccord Wealth is a trading name of Canaccord Genuity Wealth Limited (CGWL), CG Wealth Planning Limited (CGWPL), Cantab Asset Management Limited (CAML), Canaccord Genuity Wealth (International) Limited (CGWIL) and Canaccord Asset Management (International) Ltd (CAMIL), which are subsidiaries of Canaccord Genuity Group Inc. In Scotland, Adam & Company is a trading name CGWL and CGWPL.

Canaccord Asset Management (CAM) is a trading name of Canaccord Genuity Asset Management Limited (CGAML) which is a subsidiary of the Canaccord Genuity Group Inc.

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CGWL, CGWPL, CGAML and CAML are registered in England & Wales at 88 Wood Street, London, EC2V 7QR (numbers 03739694, 08284862, 03146580 and 05691283 respectively).

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is authorised by the Financial Sector Conduct Authority as a financial services provider in South Africa, FSP no. 48055. CGWIL is registered in Guernsey at Dorey Court, Elizabeth

Avenue, St. Peter Port, Guernsey, GY1 2HT (number 22761).

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