Supplier Code of Conduct

ABN·AMRO

Our Purpose

Our purpose Banking for better, for generations to come is at the heart of everything we do. Together with our customers, business partners and suppliers, we take on the challenges of our time and shape the future, guided by our core values of care, courage and collaboration.

Sustainability is a key element in our strategy. and we aim to support suppliers accelerate the sustainability shift. At the same time, we also reduce our own footprint. Our strategy has a focus on climate change, social impact and the circular economy & biodiversity.

Supplier Code of Conduct

In line with our purpose, we ask you (and your subcontractors) to conduct business with integrity and respect for people and the environment, throughout your value chain. This Supplier Code of Conduct sets out what we expect from you.

Naturally, suppliers comply with relevant laws, regulations, and standards (including OECD guidelines, UN Guiding Principles on Business & Human Rights, ILO conventions, OHSAS, ISO) as well as applicable environmental laws and regulations, and standards) in the jurisdictions where they operate.

The Supplier Code of Conduct (Code) defines what we expect of you when delivering products, goods or services to ABN AMRO. We require our suppliers to comply with the Code and failure to comply may impact your relationship with ABN AMRO.

We are constantly improving our business operations. We do this together with you and recognise the effort required to comply with this Code

Procurement department

Procurement is the central purchasing department within ABN AMRO. Procurement provides guidance and expertise throughout the entire procurement process: from sourcing and contracting to payment. We manage supplier risk and facilitate data requests as required by our Risk framework and the regulator.

We welcome any feedback you may have on our own performance and behaviour: together we can ensure a positive impact on climate and society, together we can accelerate the sustainability shift.



If you have any questions regarding this Code, including questions on how to implement the requirements, please contact your ABN AMRO contact person.


“Collaborating with suppliers to create more impact transforms challenges into opportunities, turning a shared vision into a powerful reality.“

How we establish the performance and resilience of our supply chain

Our suppliers are diverse and have different ways (and abilities) to adhere to this Code. However, it's important for us to manage risks and establish the performance and resilience of our supply chain.

Depending on the nature and value of the products or services suppliers provide, we might need suppliers to meet specific requirements and controls to show how they are adhering to our key principles. To this end, we monitor suppliers periodically based on their risk level, criticality and the extent of mitigating measures. Performance related to this Code must be verifiable through independent leading assessors (GSES and Hellios). Any costs for verification are borne by the supplier.

We encourage the use of credible third-party validated certifications. When needed, suppliers can be audited on-site and off-site. ABN AMRO reserves the right to suspend or terminate relationships if suppliers refuse audits, fail to make progress on remediation, or engage in illegal activities.

What does this mean for our suppliers?

- Suppliers provide transparency and participate in necessary audits.
- Suppliers should engage in remediation of issues and where appropriate, we will work with our suppliers as they end, minimize, or mitigate a violation.
- Suppliers must have an Ariba account to do business with us: ABN AMRO uses SAP Ariba for procurement activities and supplier collaboration.



"The code of conduct outlines not only the fundamental expectations, such as compliance with laws and regulations, but also the mutual standards that we hold each other to"

Our supplier code of conduct outlines our expectations and requirements on the following:



Ethics and Integrity



Social Responsibility



Data security & privacy



Effective channels for reporting misconduct without retaliation



Environmental Sustainability



Diversity & Inclusion

Ethics and Integrity

Anti-Bribery and Corruption

What do we expect from our suppliers?

- Suppliers must not engage in any corrupt dealings with any other person or company; offer, promise, give, request, agree to receive or accept a bribe; engage in facilitation payments; offer gifts intended to unduly influence another party to gain or retain business; make political or charitable donations for or on behalf of ABN AMRO.
- Before entering into a business relationship with a supplier, ABN AMRO carries out a risk assessment and due diligence to minimise the risk of being associated with bribery or corruption.
- Suppliers comply with ABN AMRO's Anti-Bribery and Corruption Policy.

Anti-money Laundering

What do we expect from our suppliers?

- Suppliers must not engage in illicit activities, including doing business with those engaged in illicit activities. Illicit activities include, without limitation, money laundering, terrorism financing, human trafficking, slavery or the proliferation of weapons of mass destruction.
- Read the Anti-money laundering statement.

Conflicts of interest

What do we expect from our suppliers?

- Conflicts of interest can arise as a result of financial, social, political, family or other personal interests or loyalties. Suppliers must ensure that their professional judgments and responsibilities are not compromised by bias, conflicts of interest, or undue influence from others.
- Suppliers proactively disclose potential conflicts of interest, whether arising consciously or inadvertently, due to relationships—business or personal—with clients, other third parties, business associates, competitors of ABN AMRO or ABN AMRO employees.



Data security & privacy

Data Privacy Compliance Guidelines

What do we expect from our suppliers?

- Suppliers safeguard personal data and confidential information from unauthorized use, disclosure, access, loss, alteration, damage, and destruction.
- Suppliers handle information in compliance with (local)laws, regulations and guidelines.
- Suppliers have a documented Data Privacy & Protection policy.



Environmental Sustainability

A. Reducing your footprint

Due diligence processes to identify and mitigate environmental risks

What do we expect from our suppliers?

- To support our shared environmental sustainability objectives, suppliers implement policies and due diligence processes to identify, assess, and mitigate environmental risks across their operations. This includes setting clear performance standards and integrating environmental criteria into their decision-making processes.
- Suppliers should have a comprehensive view of their environmental risk exposure and to proactively manage these risks to minimize potential negative impacts.

Disclosing environmental impact

What do we expect from our suppliers?

- When applicable, suppliers measure and disclose their environmental impact in line with CSRD, including data including data on greenhouse gas emissions, energy consumption, water usage, and waste generation.
- Suppliers deliver footprint/energy data about the products purchased or services delivered to ABN AMRO, when needed.

Reducing environmental footprint

What do we expect from our suppliers?

- Suppliers should contribute to limiting global warming, in line with the Paris Agreement's goal of limiting global warming to well-below 2 °C, by creating clear plans, setting ambitious and if possible, science-based targets, measuring progress regularly, and reporting on their performance. (We encourage suppliers to commit to the Science Based Targets initiative (SBTi) to align with global best practices).



B. Circular economy & biodiversity

Protecting biodiversity and ecosystems

What do we expect from our suppliers?

- Suppliers identify and mitigate negative impacts on biodiversity and ecosystems, following the mitigation hierarchy of avoidance, minimization, restoration, and offsetting.
- To the extent possible, suppliers address biodiversity loss drivers such as land and sea use changes, exploitation, climate change, pollution, and invasive species.
- Where possible, suppliers seek opportunities to contribute positively to biodiversity conservation and ecosystem resilience and be transparent about their impact.
- Suppliers promote sustainable land use, responsible sourcing of natural resources, and protect high conservation value areas in their value chain.

Supporting circular economy principles

What do we expect from our suppliers?

- Suppliers adopt circular economy principles in their operations and work with us to integrate these principles into their business models. This includes prioritizing waste reduction, reuse, and recycling, and designing products and processes for circularity.
- Suppliers set targets for increasing their use of recycled and renewable materials and for minimizing waste to landfill.
- When necessary, suppliers can provide data on the circularity levels of their products.





Social Responsibility

Social responsibility begins with respect for human rights: we require our suppliers to conduct business with integrity and respect for people throughout their entire value chain, with specific attention to the following:

A. Labour conditions

Prohibition on child labour

What do we expect from our suppliers?

- We do not accept child labour. Suppliers shall not use or benefit from child labor and shall only employ personnel who meet the applicable minimum legal age requirement to work in the country or countries in which they operate.
- The supplier shall not allow children under the age of 18 to perform hazardous work or night work.

Prohibition on forced labour

What do we expect from our suppliers?

- We do not accept any form of forced labour, bonded labour or involuntary prison labour.
- Work shall be conducted on a voluntary basis and all workers shall have the right to enter into and terminate their employment freely in compliance with the statutory notice periods.
- Workers' freedom of movement is not restricted, nor are workers' personal documents retained by suppliers.

(Living) Wages and benefits

What do we expect from our suppliers?

- We expect our suppliers to respect the right of personnel to a living wage and ensure that wages for a normal work week, not including overtime, shall always meet at least legal or industry minimum standards.
- Wages shall be sufficient to meet the basic needs of personnel and provide some discretionary income.
- Wages are paid according to contractual terms, on time and at least on a monthly basis. Suppliers shall also aim to minimize and mitigate structural differences in pay and benefits for equal or comparable work.

Freedom of association and collective bargaining

What do we expect from our suppliers?

- We require suppliers to respect the legal right to freedom of association and collective bargaining.
- Suppliers shall allow personnel to lawfully form and join organizations and shall not hinder peaceful association. These rights are exercised without fear of discrimination, repercussions, violence or harassment, whether physical or psychological.

Working hours

What do we expect from our suppliers?

- Suppliers shall set working hours in compliance with applicable laws and regulations in the country or countries in which they operate. If no national legislation exists, suppliers comply with the International Standards of the ILO regarding working hours.
- Suppliers carry out operations in ways that limit structural overtime to a level that promotes humane and productive working conditions. Overtime hours are voluntary and workers refusing overtime hours are not penalized.
- Under certain circumstances, in accordance with applicable legislation, overtime hours may be acceptable for a short period if agreed through worker representation, where applicable. ABN AMRO can ask for disclosure of the overtime hours made.

Providing safe and healthy working conditions

What do we expect from our suppliers?

- Our suppliers must comply with all local workplace and safety laws, take appropriate steps to prevent workplace incidents, and provide a safe working environment for their employees and those affected by their activities.
- Suppliers are expected to provide working conditions that meet the needs of employees to conduct their responsibilities in a safe, comfortable, and effective manner.
- Suppliers should at minimum have channels in place to assist their employees with resources to mental and physical healthcare for any health concerns related to work, working conditions, or work environment.

B. Responsible sourcing and community engagement

Responsible sourcing and community engagement

What do we expect from our suppliers?

- Suppliers shall respect the rights, interests, and development aspirations of local communities and vulnerable groups it affects through its business operations.
- Suppliers shall engage in open dialogue and empower social contribution with stakeholders and authorities in and around the area in which they operate.
- Suppliers identify human rights risks and implement appropriate mitigation and remediation measures in the supply chain.



Effective channels for reporting misconduct without retaliation

Effective Whistleblowing and Grievance Mechanisms

What do we expect from our suppliers?

- Suppliers need to have an accessible, effective and transparent channel and whistleblowing procedure (grievance mechanisms) in place that allows employees, contractors, and third parties to raise a complaint or report suspected wrongdoing without retaliation. This should ensure confidentially and, where legally permissible, allow for anonymous reporting.
- For both grievance mechanisms, suppliers make sure that employees and workers in the value chain can use these channels and that they are aware of these channels through providing regular communication and training.
- Suppliers must implement a process to monitor and address concerns raised, ensuring appropriate actions are taken when material negative impact is identified via the channel/whistleblowing procedure.
- Suppliers can set up their own grievance mechanism, outsource it to a third-party organization, or both.
- Suppliers cooperate in resolving issues through external grievance mechanisms as well.



Diversity & Inclusion

Diversity, Inclusion, and Equity Initiatives

What do we expect from our suppliers?

- Suppliers have practices in place that ensure unbiased hiring.
- Suppliers create a work environment in which workers are free from discrimination (based on gender, sexual orientation, race, colour, disability, religion, political opinion, national and social origin, or any other status), threatening, violence or harassment, including sexual harassment and bullying and disruptive or other improper behaviour, whether physical or psychological.
- Suppliers foster a work environment where equal opportunities are ensured, this includes equal pay for equal work.
- Suppliers promote accessibility for employees and clients (for example ensure that websites and online platforms are usable for people with visual, auditory, or cognitive impairments or providing assistive technologies, such as screen magnifiers, speech-to-text software, to support employees with disabilities).
- Suppliers promote and demonstrate progress to diversity, inclusion and equity at all levels in the organisation; engaging everyone and encouraging them to be themselves.



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