



Supplier Code of Conduct

Purpose

ABN AMRO is a personal bank in the digital age, dedicated to play an important role in society. As a bank, we focus on inclusiveness, sustainability, social enterprise, innovation, daily banking and more.

As a bank, we have a clear purpose: Banking for better, for generations to come. Together with our customers, we take on the challenges of our time and shape the future. We take our role in society seriously. We offer our customers confidence and long-term value. Our purpose is the compass in everything we do. Read more about our [Purpose and Strategy](#).

Sustainability is an important part of ABN AMRO's strategy. Our overarching goal is to accelerate the transition to sustainability. We focus on three themes: climate change, the circular economy and social impact. ABN AMRO has released bank-wide statements for three key topics ([Cross-sector policy](#)): human rights, climate change and animal welfare. The declarations set out our approach and how we deal with sustainability issues in these areas.

We are aware of our role as a financial services provider in society and the various roles and responsibilities this entails.

The Supplier Code of Conduct

The Supplier Code of Conduct (the Code of Conduct) has been drawn up to provide clarity on the principles that ABN AMRO uses in its procurement policy regarding sustainable procurement and conducting business with ethics

and integrity. Suppliers must conduct their business activities in a fair way, with integrity and with respect for people and the environment, throughout their entire value chain. We require our suppliers to comply with the Code of Conduct and acknowledge that failure to comply with it may damage their relationship with ABN AMRO.

Ethics and Integrity

Suppliers must comply with all applicable (international) laws, regulations and standards, including the OECD guidelines, the guiding principles of the United Nations, the United Nations human rights conventions and the Fundamental Conventions of the International Labour Organization (ILO), OHSAS and ISO. In addition, the supplier should act in line with ABN AMRO's policy on diversity and inclusion.

We hold ourselves and our suppliers to a high standard of conducting business. That means we do not only expect our suppliers to have policies and procedures to ensure risks are monitored and managed, but also ensure they can provide transparency on the different risk topics (Third Party Risk Management, Sustainability) and share it with ABN AMRO. These topics will be a continuous subject of the dialogue with our suppliers. In addition it must be possible to verify performance and progress on these topics through independent leading assessors (e.g. GSES, Hellios). Any costs for verification are borne by the supplier.

ABC policy

Under ABN AMRO's policy, any form of bribery or corruption is prohibited. [The Anti-bribery and Corruption policy](#) is part of this Code of Conduct.

Anti-money Laundering

ABN AMRO has a gatekeeper role in detecting financial crime. Suppliers must not engage in illicit activities, including doing business with those engaged in illicit activities, including, without limitation, money laundering, terrorism financing, human trafficking, slavery or the proliferation of weapons of mass destruction. Read the [Anti-money laundry statement](#).

Suppliers must safeguard confidential and/or proprietary information and handle personal data in compliance with laws, regulations and guidelines. Suppliers need to provide safe products and services and have to ensure they meet requirements set by the authorities and regulators such as De Nederlandse Bank (DNB), the European Central Bank (ECB) and European Banking Authority (EBA). ABN AMRO acts in accordance with the guidelines set by the Regulators and actively steers on 'Third Party Risk Management'. Read more about ['Risk Management'](#).

Way of working

ABN AMRO uses SAP Ariba to manage its Procurement activities and to collaborate with Suppliers. From Source-to-Pay, Riskmanagement to Supplier Performance, all activities are streamlined with the use of SAP Ariba. Therefore in order to collaborate and conduct business with ABN AMRO suppliers must have an Ariba account. Read more about [Suppliers and our way of working](#).

Impact on environment and human rights

In short, ABN AMRO expects its suppliers to have an understanding of the environmental and human rights related risks to their business operations. They must also take measures to ensure that these risks are mitigated. ABN AMRO requires transparency on what impacts occur in this area and an effective complaints mechanism. There is an ongoing dialogue on this subject with ABN AMRO and its suppliers. If necessary, ABN AMRO's sustainability experts are brought in for a second line of assessment. When a supplier is unable to provide sufficient insight into environmental and human rights risks, or to substantiate how it mitigates these risks, ABN AMRO will enter into dialogue with the supplier. If the discussion does not lead to improvement, the relationship can be terminated.

Effective grievance mechanism

Suppliers should have an effective complaints mechanism in place to clarify current impacts for both internal and external stakeholders. This means that there is a special 'desk' for complaints and that suppliers continuously monitor the status of the complaints.

ABN AMRO expects that processes for managing environmental and social risks are documented within the company. And consequently suppliers should inform their stakeholders (ABN AMRO) about the identified risks and the actual impact it may have.

Be a part of the solution

Based on the understanding of these risks, it is thereby expected that the company has taken sufficient measures to mitigate these risks. In doing so, the supplier must ensure that the negative impact on people and the environment caused by activities in its own business operations or in the supply chain is prevented or addressed. In the event that an impact does occur (e.g. child labor, excessive CO2 emissions), suppliers must ensure that a solution is found.

Together more impact

In addition to its expectation that suppliers should conduct their business in accordance with international standards, ABN AMRO is also keen to collaborate with their suppliers to make a bigger impact on climate and society. This may involve imposing additional requirements in line with the bank's purpose and sustainability strategy. During this process, the supplier is expected to take a proactive approach.