



FitchGroup

SUPPLIER
**CODE OF
CONDUCT**

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INTRODUCTION

The Fitch Group is committed to the highest standards of ethical business conduct, and we expect the same of our Suppliers. This Supplier Code of Conduct (the “Code”) is intended to convey our expectation that Suppliers maintain safe working conditions, commit to inclusive, fair and respectful treatment of their employees and contractors, comply with all applicable laws and regulations, and follow ethical business practices. It is our intent to:

- carry out our business with the highest standards of integrity and responsibility;
- require our Suppliers to do the same; and
- hold Suppliers accountable for compliance with the Code.

Our Code has been drawn from the standards and values set forth by the international organizations and conventions of which we are members or signatories, including the Principles of the UN Global Compact.

Fitch expects all Suppliers to adhere to the principles of the Code. This will be a material consideration in selecting and evaluating our new and existing Supplier relationships. The Code cannot anticipate every potential ethical situation Suppliers will face. Suppliers are encouraged to seek guidance from [Fitch’s Supplier Management team](#) about any issues raised by this Code.

A VALUES-DRIVEN APPROACH

Fitch’s values are straightforward: to foster a strong and inclusive culture; to be completely transparent and fiercely independent; and to be exceptional partners to our stakeholders. Additionally, one of our key Corporate Social Responsibility (CSR) principles is to partner with excellence, supporting organizations that have a strong and credible reputation for the positive impact they have in their communities.

We expect our Suppliers (and their suppliers) to align with our values and principles, adhering to responsible and sustainable business practices, leveraging diverse suppliers when possible, contributing to their communities, and actively managing their own supplier relationships.

Business Integrity

- We expect our Suppliers to comply with all applicable financial laws and regulations, including those that govern competition, anti-trust, anti-corruption and anti-money laundering practices.
- Suppliers are expected to exhibit a high standard of financial integrity at all times, maintaining accurate financial books, records and financial documents.
- Suppliers are expected to work against corruption in all its forms, and are prohibited from soliciting or accepting any bribes, kickbacks, or participating in quid pro quo arrangements of any kind in order to provide services.
- Suppliers must not accept payment, loans, services, equipment, or any other benefit or thing of value, or any gift, entertainment, or reimbursement of expenses that exceeds amounts customary for the time and place.

Respect for Individuals

- Suppliers must support and respect the protection of human rights in accordance with the UN’s Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights and ensure they are not complicit in human rights abuses.
- Suppliers must comply with all applicable child labor laws, anti-human trafficking laws and anti-modern slavery laws.
- We expect our Suppliers to be inclusive and welcoming, and they must not discriminate on the basis of race, color, ethnicity, age, gender, gender identity or expression, national origin, citizenship status, sexual orientation, disability, military and veteran status, religion or belief or other legally protected status.
- Suppliers must adhere to health, safety and labor standards and regulations governing proper working conditions, working hours, compensation, right to association, right to collective bargaining, and freely chosen employment.
- We expect Suppliers to recognize and respect the rights of their employees to associate freely and to organize and bargain collectively in accordance with the local laws.
- We encourage Suppliers to promote fair pay practices within their workforce.

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Protecting the Environment

- We expect our Suppliers to be respectful of the environment, complying with all applicable environmental laws, requirements, and regulations, and to support a precautionary approach to environmental challenges where possible.
- We encourage our Suppliers to monitor and undertake initiatives to promote greater environmental responsibility, to minimize waste and emissions from their operations, products and services and encourage the development and diffusion of environmentally friendly technologies.
- Fitch has set an objective to achieve net zero emissions by 2040, and we encourage Suppliers to set their own climate targets consistent with the Paris Agreement.

Ethical Behavior

- Suppliers must disclose situations in which a conflict of interest may arise, and also avoid the appearance of a conflict between their business interests and those of Fitch. A conflict of interest is any circumstance that may cast doubt on a Supplier's ability to act with total objectivity when doing business with Fitch.
- Suppliers must not commit fraud or fraudulent acts, and should ensure that their actions and conduct also avoid the appearance of fraud. For purposes of this Code, fraud means the intentional misrepresentation of, or failure to disclose, a fact or facts that result in damage to Fitch.
- When doing business with Fitch, Suppliers may have access to confidential information. It is a violation of this Code and of all contracts with Fitch to use or disclose this confidential information.

COMPLIANCE WITH THIS CODE

It is the responsibility of our Suppliers to:

- read, understand and comply with the Code;
- comply with all laws and regulations applicable to their business; and
- report known or suspected violations of this Code.

VIOLATION AND NON-COMPLIANCE

Suppliers are required to report a suspected violation of this Code immediately, regardless of the offender's identity or position. A report may be submitted via the [Fitch Ethics Hotline](#) site.

Any Supplier who authorizes, participates in, or withholds information regarding an action that violates this Code may be subject to contract termination in accordance with the terms of their contract with Fitch.

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