

Supplier Code of Conduct

February 2025

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Group Procurement Statement

Our Commitment

Our goal is to work collaboratively with our supply chain partners towards a responsible business conduct; in cases where a supplier is unable to fully adhere to this Supplier Code of Conduct (“**Code**”).

Lloyd's is signed up to the [United Nations Global Compact](#), committing to the [ten universal principles](#) for human rights, labour, the environment and anti-corruption. Our actions in these areas improve our responsible business practices, supporting the United Nations [Sustainable Development Goals](#).

Your Commitment

- Fully comply with internationally recognised environmental, social and corporate governance standards (ESG standards) and applicable laws.
- Take a pro-active approach, committing to responsible business initiatives like the United Nations Sustainable Development Goals, the United Nations Global Compact and other national or international positive commitments.
- Have a responsible business strategy and transparent reporting, and where applicable responsible investment policy, appropriate to the size and nature of the supplier.
- Ensure their workforce (including those not directly employed by the Supplier i.e. agency staff, contractors and subcontractors) are kept aware of the Code and the supplier's own policy (if this is to a higher standard) and provide them with the appropriate training and skills to maintain continuous improvement.
- Maintain a high level of confidentiality, integrity, availability and operational resilience within all systems that are processing Lloyd's data and to ensure compliance with applicable information security legislation and regulation such as DORA and regional specific laws and standards.

Our Vision

- To demonstrate **continuous improvement** and the achievement of **value for money** through the effective procurement of goods and services to ensure that Lloyd's needs and those of the local community are met.
- To have a clear supplier management framework of **accountability and responsibility** that adopts legally compliant, best practice procurement procedures and techniques.
- To build a **diverse and competitive market** that can meet Lloyd's and its service users' requirements and provide value for money.
- To encourage **communication and interaction with local and national suppliers** to understand their views and what enables and encourages diverse parts of the market to bid for work with Lloyd's.
- To ensure all products and services that involve data are **provided in a secure and ethically responsible way**, ensuring **compliance with all data protection regulations** and Information Security controls and regulatory requirements in the jurisdictions where data is processed.
- To develop relationships between Lloyd's, the business community and the broader voluntary and community sector that **creates mutually advantageous, flexible and long-term relations** based on continuous improvement of quality of performance and financial savings.
- To ensure that our purchasing and contracting activities are **ethically, environmentally, and socially responsible**, applying Lloyd's principles around sustainable procurement, responsible business, anti-financial crime, Living Wage, diversity, equality & inclusion, modern slavery and human rights.
- To ensure that our suppliers promote an **inclusive culture** for all and embrace **diversity** in the workplace.

Requirements & Controls

This Code sets out the standards of business conduct, which we ask all our suppliers and any sub-contractors to comply with. Throughout the contract term and during renewal, suppliers may be required to evidence compliance with this Code; Lloyd's has the right to assess the supplier's compliance at any time.

If the supplier is in breach of the Code, the supplier will be required to take all reasonable measures to comply fully with the Code and must promptly report any known or suspected breach to Lloyd's.

Outsourcing

Lloyd's is headquartered in the United Kingdom and therefore subject to regulation by UK financial services regulators. In 2021 the Prudential Regulation Authority set out requirements and expectations relating to outsourcing and supplier risk management (PRA [Supervisory Statement SS2/21 'Outsourcing and Third-Party Risk Management'](#)).

Financial Crime

Importance

All suppliers and their related parties must comply with applicable legislation and regulations to protect Lloyd's (including the Corporation and the Lloyd's market) and wider society from financial crime.

Expectation from Suppliers

- Suppliers must embed basic business principles in their activities and conduct in a Code of Business Standards or equivalent. This should include acknowledgement and commitment to adhere to local laws and regulations.
- Lloyd's expects suppliers to have policies and/or controls in place to mitigate financial crime, including in respect of anti-bribery & corruption, anti-money laundering, fraud (including failure to prevent fraud under the Economic Crime and Corporate Transparency Act 2023), sanctions, anti-facilitation of tax evasion and market abuse.
- Suppliers shall comply with all applicable laws, statutes, regulations, and codes relating to anti-bribery and anti-corruption, including but not limited to the Bribery Act 2010.
- Suppliers must ensure that they comply with UK and all other applicable international sanction regimes in which they operate in. Suppliers must have and adhere to reasonable and lawful payment policies with their own suppliers and subcontractors.
- Suppliers must not engage in acts or any form of bribery, including making facilitation payments, or in any way facilitate tax evasion.
- Suppliers must disclose any potential, perceived or actual conflicts of interest to Lloyd's. Measures should be taken for suppliers to avoid any activities or relationships that could create a conflict of interest.
- Lloyd's is governed by UK Market Abuse Regulation. Where the supplier acting on Lloyd's behalf has access to material non-public information held by Lloyd's, the supplier is responsible for maintaining confidentiality and their own insider lists as well as managing their own undertakings. In such circumstances, Lloyd's will provide the supplier with a letter explaining its obligations
- Where suppliers subcontract aspects of their deliverables or processes (as may be agreed by Lloyd's), they must ensure that their supply chain or subcontractors comply with the requirements set out in this Code and inform Lloyd's of the subcontractor used for the

purpose of activities conducted on behalf of Lloyd's. Suppliers must conduct due diligence on their own suppliers.

- Suppliers must notify Lloyd's of proposed changes in their ownership structure or within their senior management.
- Supplier should notify Lloyd's of any illegal activity identified (whether successful or not) in relation to the engagement as soon as possible by using our whistleblowing procedures found [here](#).

Evidence of requirements

- Evidence of appropriate arrangements to ensure compliance with national and international sanctions legislation.
- Evidence of an appropriate anti-bribery and corruption policy and practices, that demonstrate compliance with applicable legislation.
- Details of other policies and practices designed to mitigate the risk of being used to further financial crime, including Bribery and Corruption, Fraud, Money Laundering, the Facilitation of Tax Evasion and Market Abuse.
- Details of oversight mechanisms in place where activities are outsourced or otherwise sub-contracted.

Environment

Importance

Lloyd's is certified to ISO 14001 (International Environmental Management Standard). Lloyd's aims to integrate sustainability into all its business areas and expects its suppliers to support sound environmental management principles and reduce their impact on the environment.

Lloyd's aims to achieve carbon neutral status by the end of 2025 in terms of our own operations and are looking to our suppliers to support this.

Expectation from Suppliers

- Suppliers must have a written environmental/sustainability policy or equivalent, appropriate to the size and nature of the supplier's operations that, where applicable, addresses preventing, mitigating, and controlling serious environmental and health impacts from operations including raw material usage, greenhouse gas emissions, water, waste, air quality and biodiversity.
- Suppliers must have effective internal environmental management programmes with adequately trained staff responsible for managing the organisation's environmental performance.

- Suppliers must abide by all legislation and regulations related to the protection of the environment and the handling and disposal of dangerous and hazardous materials.
- Suppliers should use products which can be re-used, recycled, used in an energy efficient manner and which cause minimal environmental damage at all stages of the supply chain.
- Suppliers should monitor and reduce, where feasible their environmental impacts.

Evidence of requirements

- Certification to ISO 14001 (Environmental Management Standard) or evidence of an Environmental Policy or commitment statement declaring commitment to comply with environmental laws and regulations and continuous improvement in environmental performance.
- Copies of applicable environmental permits or licences compliant with legal requirements.
- A valid Environmental Impact Assessment report or documentation which covers all activities within its business scope, compliant with legal requirements.

Labour & Modern Slavery

Importance

Lloyd's is committed to the protection of human rights and is guided by fundamental principles such as the United Nations Universal Declaration of Human Rights, the International Labour Organisation (ILO), core labour standards and the Modern Slavery Act 2015. Lloyd's seeks to ensure there are no human rights abuses throughout its supply chains by encouraging behaviours and practices that are consistent with these principles. Further information is available in our [Modern Slavery Act Statement](#).

Expectation from Suppliers

- A commitment to anti-slavery and compliance with the requirements of the Modern Slavery Act 2015, or equivalent.
- Suppliers must take appropriate steps to identify and reduce risks of child labour.
- Provision of a safe working environment, abiding by national Health and Safety laws.
- Compliance with all applicable national wage and working hour laws.
- Employees and employees of any sub-contractors are provided with a mechanism to enable individuals to raise concerns relating to wrongdoing or malpractice at work such as [whistleblowing](#).

Diversity & Inclusion

Importance

Our aim is to transform the culture in both the Lloyd's Corporation and the Lloyd's market by embedding inclusive practices that enable high performance. We aim to change perceptions of the industry so that it becomes a destination of choice for global talent.

Expectation from Suppliers

Our suppliers should support and reinforce Lloyd's commitment to providing an inclusive culture for its workforce. We expect our suppliers to provide the same inclusive opportunities to their workforce and we require commitment to the following:

- Compliance with all applicable national equality laws.
- Zero-tolerance of any form of unlawful discrimination: promoting a workplace free from bullying, harassment, victimisation, racism, or any other form of abuse.
- Demonstrate a commitment to inclusion: by having a Diversity and Inclusion policy or equivalent, that covers gender, gender identity/expression, marital/civil partnership status, race, religion, ethnicity, disability, age, sexual orientation, socio-economic background, and nationality.
- Provide training to all staff covering equality, diversity, and inclusion principles.
- Take measures to widen access to employment opportunities amongst local people, including diverse groups, the unemployed and people who are currently under-represented within the supplier's workforce.
- Provide evidence where requested by Lloyd's, of how services are inclusive and accessible to all intended users, such as people with disabilities as well as people from all diversity groups.

Evidence of requirements

- Evidence of compliance with the UK's Equality Act of 2010 and/or local equality laws.
- Processes in place that prohibit all forms of discrimination, both in the workplace and at the time of recruitment.
- Evidence of diversity and social mobility monitoring data for its workforce where national laws permit the collection of such data.

- Training records demonstrating that all staff have training in relevant aspects of Equality, Diversity & Inclusion.
- Evidence of how Equality, Diversity & Inclusion is communicated and promoted to the workforce and supply chain where relevant.
- Evidence of a continuous improvement process.

Bullying & Harassment

Importance

Under the Equality Act 2010 (“EA”) sexual harassment is defined as unwanted conduct of a sexual nature which has the purpose or effect of violating someone’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Under the EA employers have a positive legal duty to take reasonable steps to prevent sexual harassment of their workers. This is a preventative duty, which is designed to improve workplace culture requiring employers to anticipate and prevent sexual harassment and bullying by taking proactive reasonable steps.

The preventative duty includes worker-on-worker harassment and harassment by third parties such as customers, suppliers, or clients.

At Lloyd’s we have taken a number of steps including having a policy on bullying and harassment, making employees aware of how they can report such behaviour and a procedure for managing complaints along with training for our staff.

Expectation from Suppliers

We take potential harassment by suppliers seriously and we expect our suppliers to comply with the EA and make a commitment that you have taken the following steps:

- have appropriate policies and procedures in place dealing with bullying and harassment along with reviews at regular intervals; and
- provide appropriate, up to date and regular training to your staff on bullying and harassment.

Evidence of requirements

- Evidence of compliance with the UK's Equality Act of 2010 and/or local equality laws.
- Process in place which ensures clear steps for escalation, reporting and remediation.
- Training records demonstrating that all staff have been trained with respect to the prevention of sexual harassment and anti-bullying training.

Wellbeing

Importance

At Lloyd's we take a proactive approach to wellbeing; it plays a key part in building an inclusive culture. Organisations taking this approach can also benefit from improved employee retention and productivity.

Expectation from Suppliers

We expect our suppliers to support Lloyd's commitment to wellbeing and to take a proactive approach by implementing:

- Policies, awareness programmes and employee benefits designed to support wellbeing, including a healthy work life balance and mental health awareness.
- Plans to produce, implement and communicate a mental health at work approach.
- Processes to facilitate discussions and/or offer support regarding mental health at work.
- Routine monitoring of employee mental health and wellbeing.

Evidence of requirements

- Training records demonstrating that staff have training in Wellbeing.
- Evidence of how Wellbeing is communicated and promoted to the workforce and supply chain where relevant.

Lloyd's Brand

Importance

The Lloyd's brand is one of our strongest assets and is carefully promoted and protected. Lloyd's suppliers must not misuse or misrepresent the brand and are required to operate to our brand standards and guidelines. Suppliers must:

- Not reference Lloyd's or use the Lloyd's logo in any marketing or promotional activities.
- Meet the full requirements of all Lloyd's brand, style and language guidelines across all services provided.
- Ensure any systems, tools, platforms etc. being provided as part of the services are compatible with the requirements of our brand guidelines.
- Identify at the beginning of the development process, before contracts are agreed, any areas of service which cannot comply with our brand guidelines (i.e. components which cannot be edited within a system) for the brand team to consider and advise accordingly.
- Ensure that controls are in place to ensure that all employees and subcontractors of the supplier working on promoting Lloyd's services, creating communications on behalf of Lloyd's and/or delivering marketing and events are aware of, and comply with, the Lloyd's brand standards and guidelines.
- Ensure controls are in place to supply or return all creative assets that are the property of Lloyd's at the end of a project or contract, by contacting brand@lloyds.com to arrange handover.

Information Security

Importance

At Lloyd's we recognise that Information Security is organisation wide and not just an IT matter. It must reflect and keep up to date with organisational design, technology adoption, culture, and regulatory and legal change.

Expectation from Suppliers

Lloyd's is a regulated organisation and as such, Lloyd's have an obligation to abide by the expectations set out by regulators, including the Prudential Regulation Authority (PRA) and Financial Conduct Authority (FCA). Our suppliers must demonstrate compatibility with Lloyd's Information Security standards, as detailed in Lloyd's contracts. This will include the adoption of industry best practices including:

- Recognised security compliance certification such as SOC 2 and 3, Cyber Essentials, Cyber Essentials Plus, ISO 27001 or equivalent.
- Maintaining formal security policies and standards.
- Ensuring appropriate business administration standards are in place such as preemployment screening and segregation of duties.
- Declaring any outsourced services that are used to provide services to Lloyd's.
- Applying appropriate controls to protect the confidentiality, integrity, and availability of Lloyd's data.
- Ensuring that effective technical controls are in place to ensure appropriate Authentication (2 Factor Authentication or Multi-Factor Authentication), Identification and Authorisation paying particular attention to password policy and authentication mechanisms.
- Having a formal Incident and Response process that will capture, remediate, and notify Lloyd's of any breach of Information Security applicable to Lloyd's in line with contract requirements and Data Protection legislation.
- Applying essential Network Security controls such as Network Segregation and Segmentation, Firewalls, Proxies, Network Scans, Honey pots, Anti-Malware, Intrusion Detection Systems, and Intrusion Prevention Systems.
- Ensuring that strict Physical and Environmental security controls are in place for any premises where Lloyd's data is either stored managed or processed.
- Ensuring that the risks to the supplier, and Lloyd's is appropriately assessed, documented, and managed for any new systems, software and services and changes to systems, software and services when processing Lloyd's data.

- Ensuring that a process is in place to risk assess and monitor suppliers and sub-contractors of the supplier that are processing Lloyd's data.
- Ensuring that business continuity and disaster recovery plans are in place, tested to ensure successful restoration and updated as necessary to protect essential services and that immutable backups are held to protect against ransomware or other impacts (see business continuity section below).
- Demonstrating compliance with all relevant legal and regulatory standards, legislation, and regulation at a national and local level.
- Evidence of regular external audits and management of remediations.

Evidence of requirements

- Information Security Certifications such as ISO27001, certificate and ISO27001 scope document and/or SOC 2 and 3 reports and/or external audit reports assessing Information Security Controls (provided annually for critical asset suppliers, which will be determined by Lloyd's).
- Details of the Information Security Framework including regularly reviewed and approved policies and standards (including HR, Risk, Business Continuity, Physical Security and Data Protection).
- Formally documented assignment and allocation of information security roles and responsibilities and senior exec accountabilities for the delivery of the cyber security framework.
- Measures in place to ensure data is classified and protected based on its criticality and sensitivity.
- Details of regular ongoing assurance reviews on security operations (network security, asset management and protection, cryptographic controls, supplier security, systems development, cloud security, vulnerability management, identity and access and anti-malware).
- Measures in place to assess the security capabilities and management of cyber risk by suppliers (including HR screening, mandatory data, cyber training, risk management framework).
- Incident response procedures in place including regular testing and improvement activities actioned.

Data Privacy & Protection

Importance

Lloyd's has a legal and regulatory obligation to comply with applicable data protection and privacy laws including the [UK GDPR](#) and the [Data Protection Act 2018](#), where the processing of personal data is concerned. This includes for regional offices where equivalent data protection and privacy laws may apply.

To ensure that Lloyd's handles and secures both commercial and personal data ("**Lloyd's Data**") in accordance with internal policy and its legal and regulatory obligations, there is a requirement to ensure that these obligations also extend to all suppliers who process or store Lloyd's Data. It is therefore the responsibility of both Lloyd's and such suppliers to ensure compliance with applicable data protection and privacy laws including the UK GDPR and/or equivalent where regional offices are concerned, and that upon request from Lloyd's or a Lloyd's mandated auditor, that suppliers can evidence compliance.

Expectation from Suppliers

All Lloyd's Data is to be handled and processed in accordance with all applicable data privacy and data protection laws, regulations and guidance issued by the relevant data Supervisory Authorities or other applicable governing bodies. Suppliers must:

- Process Lloyd's Data only in accordance with Lloyd's written instructions.
- Not use any artificial intelligence without obtaining Lloyd's prior written consent.
- Not engage sub-processor without Lloyd's prior written consent.
- Implement the appropriate technical and organisational measures and provide Lloyd's with sufficient guarantees that sub-processors have done so.
- Comply with the key data privacy and protection principles as defined in applicable data protection and privacy legislation.
- Preserve confidentiality of Lloyd's Data and confidential information.
- Where applicable, protect the rights and freedoms of data subjects.
- Where applicable, cooperate with Lloyd's in dealing with requests from both data subjects and regulatory bodies.
- Make available to Lloyd's all information necessary to demonstrate compliance with applicable data privacy and protection laws and allow for and contribute to audits, including inspections conducted by Lloyd's or another mandated auditor.
- In accordance with applicable data protection and privacy laws, protect against the risk of personal data breaches.

- Delete or return all Lloyd's Data to Lloyd's upon expiry or termination of any applicable agreement.
- Record and manage the processing of personal data.

Lloyd's will ask suppliers to evidence adherence to the applicable data protection regulations, and industry standards.

Suppliers may also be party to confidential information with appropriate contractual provisions that is necessary for them to fulfil their obligations to Lloyd's. This confidential information must be handled in accordance with the applicable confidentiality obligations and in any event with the same degree of care as information of similar sensitivity in the supplier's own organisation.

Evidence required:

- A Data Protection Policy or equivalent, and evidence of measures to ensure employee adherence to that policy.
- Where applicable, a privacy notice. This is an essential part of compliance, it serves two purposes: to promote transparency, and to provide individuals with more control over the way their data is used.
- Where applicable, a data retention policy. A data retention (or records retention) policy outlines the organisation's protocol for retaining information.
- Details of the training given to staff, and the frequency of the training, including the number of staff who have completed the training and who have not completed it.
- Where applicable, registration details with data protection Supervisory Authorities where data is processed.
- Details of any data incidents and breaches (including 'personal data breaches', whether reported or otherwise).
- Where applicable, an inventory of Processing Activities.
- Upon request, provide evidence of any required overseas data transfer mechanisms, for example, standard contractual clauses, binding corporate rules or applicable certification.
- Where there is the contractual requirement of evidence of data return / destruction at the end of the contractual term as per the time periods documented. This evidence should come in the form of an email sent to data.protection@lloyds.com or in accordance with what is agreed in the contract.

Operational Resilience and Business Continuity

Importance

Lloyd's has committed to ensuring that Lloyd's Corporation (UK and global network) is resilient to operational threats. In March 2021 the Bank of England, with the Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA) published their final rules and policy on Operational Resilience requirements for businesses in the UK Financial Sector. These requirements mean Lloyd's must identify its Important Business Services (IBS), set impact tolerances and carry out mapping and testing for the IBSs. This mapping includes a thorough look at the dependency of third parties / suppliers to each IBS, including dependencies between suppliers and Lloyd's regional offices.

Requirements from Suppliers

Our suppliers should support the Lloyd's Business Continuity programme and Operational Resilience obligations and show commitment to the following:

- Where suppliers are providing services, systems or resources which support one of our Important Business Services (IBS), the supplier should work with Lloyd's to ensure we can remain within our stated impact tolerances ([SYSC 15A.4.1R](#)).
- Suppliers may be asked to engage in testing the overall recovery of the IBS ([SYSC 15A.5.3R](#)).
- To align with [SS6/24 – Critical third parties to the UK financial sector | Bank of England](#), Lloyd's will have an implemented supplier oversight framework that mirrors the requirements. If a supplier is deemed to be material to an IBS or Critical Service, they may be asked to provide additional reporting and MI to support the increased governance.
- A supplier should have proportionate business continuity capabilities in place, based on how critical the service is to Lloyd's.
- Suppliers must maintain resiliency of their systems and people and must notify Lloyd's of any resilience gaps that may affect the delivery of a service, system or resource in support of one of our IBS.

Evidence of requirements

Where suppliers are providing support to an IBS, the supplier will be required to provide evidence that one or more of the following exist:

- A documented Business Continuity policy, which describes its response and recovery framework.
- Test evidence that demonstrates the ability to meet the recovery time objective(s) (RTO) specified by Lloyd's.

- Test evidence which supports recovery in a variety of 'severe but plausible' scenarios in addition to standard IT Disaster Recovery tests (above). Examples of these severe but plausible scenarios could include but are not limited to cyber-attack ('back to the metal' recovery) / supplier failure (effectively Lloyd's fourth parties).
- Business Continuity plans that have been reviewed and exercised at an appropriate frequency.
- Post incident report(s) for any disruptive events that have occurred.

Account Governance & Compliance

We encourage active engagement, strong account governance and open communication with our suppliers throughout the term of the engagement. We expect our suppliers to:

- Actively support eProcurement, e-Invoicing, including as a minimum to accept PDF Purchase Orders and provide PDF invoices via email.
- Take responsibility for ensuring that they keep Lloyd's up to date with any changes to company details including VAT registered number, bank account details and address.
- Notify Lloyd's of any proposed changes to authorisations, company ownership or control structure, investigations and material risks and any other development that may impact their ability, capacity, and authorisation to deliver.

Policy Changes

Lloyd's may modify this Code from time to time by giving suppliers at least 20 days' notice in writing (writing includes email) OR by publishing a revised version on [Lloyd's website](#) which will take effect 20 days after such publication. Please refer to our version history below:

Version History

Version	Date of Revision	Date of Publication
0.1	06 Feb 2025	26 th Feb 2025