

Working Together: Supplier Standards

Supplier Code of Conduct

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Global Procurement



Foreword

At Sompo, we believe that our success is built on strong partnerships grounded in trust, integrity, and shared values. As a global organization, we are committed to operating responsibly and sustainably, and we expect the same from our suppliers, contractors, and business partners. Together, we have the opportunity to create positive impacts that go beyond business: strengthening communities, protecting the environment, and fostering innovation.

This Supplier Code of Conduct outlines the principles and standards that guide our relationships with suppliers. It reflects our commitment to ethical business practices, environmental stewardship, respect for people, and resilience. By upholding these standards, we can deliver value to our clients and stakeholders while ensuring compliance with regulations and international frameworks.

We understand that achieving these goals is a journey, and we are here to support you every step of the way. Whether it's driving sustainability, advancing diversity, or improving business continuity, we encourage you to collaborate with us to meet and exceed these expectations.

Thank you for your partnership and your commitment to these shared principles. Together, we can continue to grow responsibly and make a meaningful difference in the world.

Phil Soderberg
Global Head of Procurement

Our Approach

Sompo prioritizes health, wellbeing and financial protection to create opportunities for everyone we serve, from individuals to enterprises.

We believe that trusted, ethical, and sustainable partnerships are essential to delivering value to our clients and communities. This **Supplier Code of Conduct** outlines the standards we require from all suppliers, contractors, and business partners who work with us.

These standards are rooted in our company values:

Accountability – Raising the bar on what we deliver.

Agility – Keeping it simple as we grow.

Collaboration – Building relationships with clients and colleagues.

Development – Being curious and having a growth mindset.

Integrity – Being trustworthy and doing what's right.

The Code is also aligned with Sompo's **Environmental, Social, and Governance (ESG)** initiatives and international frameworks, including the United Nations Global Compact. By upholding these principles, we aim to build partnerships that reflect our shared commitment to ethical practices and sustainable progress.

Adherence to our Supplier Standards

At Sompo, we define a **Supplier** as any third-party organization, including its affiliates, that provides goods or services to us.

To ensure a strong and ethical partnership, **adherence to the Supplier Code of Conduct is a fundamental requirement** for doing business with Sompo. This Code establishes the minimum standards we **require** all suppliers to meet, as well as higher standards we **recommend** suppliers to adopt or work towards. These principles are embedded into the contracts governing the provision of goods and services.

We require suppliers to **consistently comply with the minimum standards outlined in the Standards** and to collaborate with Sompo to address any gaps, should they arise. Beyond meeting these requirements, we recommend suppliers to embrace continuous improvement and innovation, striving to exceed compliance and drive progress in their operations.

Compliance with Laws and Regulations

Background

We are committed to upholding the highest standards of business conduct and ensuring compliance with all applicable legal, regulatory, and external requirements in every aspect of our operations. We will always require our suppliers to fully comply with all applicable laws and regulations in the countries where they operate.

We require suppliers to:

- Comply with all applicable laws, regulations, and industry standards wherever they operate.
- Adhere to anti-bribery, corruption, money laundering, competition/antitrust, and trade sanctions regulations.
- Respect financial services and specific insurance regulation where applicable (e.g. FCA, PRA, EIOPA, DORA).
- Comply with data protection and privacy laws (GDPR, UK DPA, local equivalents).

We recommend suppliers to:

- Adopt internal compliance programmes, policies, and training.
- Be proactive in identifying regulatory changes and sharing impacts with Sompo.
- Report promptly any concerns or suspected violations of applicable laws or regulations relating to Sompo

Business Integrity and Ethical Conduct

Background

We are committed to fostering ethical business practices and holding ourselves and our partners to the highest standards of integrity. We require our suppliers to demonstrate honesty, fairness, and transparency in all their dealings. By prioritizing ethical conduct, we can build trust, protect reputations, and create long-term value for all stakeholders.

We require suppliers to:

- Conduct all business honestly, fairly, and transparently.
- Avoid conflicts of interest and disclose promptly to Sompo any that arise.
- Refuse to offer or accept bribes, kickbacks, or excessive gifts/hospitality.
- Maintain accurate, complete, and auditable business and financial records.

We recommend suppliers to:

- Build strong ethical cultures supported by training and leadership role-modelling.
- Promote transparency in commercial dealings and decision-making.

Environmental Responsibility

Background

We recognize the critical importance of protecting the environment and addressing climate challenges. We require our suppliers to operate responsibly, comply with environmental regulations, and actively reduce their environmental impact. By working together, we can drive sustainable practices, promote responsible sourcing, and contribute to a healthier planet for future generations.

We require suppliers to:

- Operate in compliance with environmental laws and regulations.
- Reduce environmental impact by managing waste, energy, emissions, and water responsibly.
- Support responsible sourcing, avoiding materials linked to illegal logging, deforestation, or conflict.

We recommend suppliers to:

- Set clear sustainability targets and report progress transparently.
- Support Sompo's ESG ambitions.
- Innovate to provide environmentally sustainable products and services.

Respect for People and Human Rights

Background

we are committed to fostering dignity, equality, and respect in all workplaces. We require suppliers to uphold international human rights standards, prohibit exploitation, and provide fair and inclusive working conditions. Suppliers must also ensure their representatives treat all stakeholders with respect, free from harassment or inappropriate behaviour. Beyond compliance, we recommend suppliers to champion diversity, equity, and employee well-being initiatives.

We require suppliers to:

- Uphold the principles of the UN Global Compact and ILO standards.
- Prohibit forced labour, child labour, modern slavery, and human trafficking.
- Provide fair pay, working hours, and benefits as required by law.
- Respect diversity, inclusion, and equal opportunity for all employees.
- Ensure workplaces are free from harassment, abuse, and discrimination.
- Ensure their representatives treat Sompo employees, customers, and stakeholders with dignity and respect at all times. Harassment, bullying, intimidation, or inappropriate behaviour, including sexual harassment, is strictly prohibited. Sompo reserves the right to request the immediate removal of any supplier personnel who violate these principles or compromise a safe working environment.

We recommend suppliers to:

- Go beyond compliance by supporting diversity, equity, and inclusion programmes.
- Promote employee engagement, wellbeing, and development opportunities.

Health, Safety, and Wellbeing

Background

At Sompo, the health, safety, and wellbeing of individuals are fundamental to our operations and partnerships. We require our suppliers to provide safe and healthy workplaces, proactively manage risks, and ensure employees are equipped to work safely. By fostering a culture of care, we can work together to promote physical and mental wellbeing, going beyond compliance to create thriving, resilient work environments..

We require suppliers to:

- Provide safe and healthy workplaces in compliance with laws and standards.
- Identify, assess, and mitigate workplace risks.
- Ensure employees are trained and equipped to carry out their work safely.

We recommend suppliers to:

- Adopt international H&S management systems (e.g., ISO 45001).
- Promote wellbeing initiatives that support both physical and mental health.

Data Protection and Information Security

Background

Safeguarding data and maintaining robust information security are critical to protecting our business, clients, and stakeholders. We require our suppliers to handle confidential information and personal data responsibly, in full compliance with applicable laws and regulations. By prioritizing cybersecurity and proactive risk management, we can work together to uphold trust, ensure resilience, and adapt to evolving security challenges.

We require suppliers to:

- Protect Sompo's confidential and sensitive information.
- Handle personal data in compliance with GDPR and equivalent data protection laws.
- Maintain strong cybersecurity controls aligned to industry standards (ISO27001, NIST).
- Report data breaches or cyber incidents to Sompo immediately.

We recommend suppliers to:

- Continually improve cybersecurity maturity and resilience.
- Share best practices and innovations to strengthen information security.

Business Continuity and Resilience

Background

At Sompo, resilience and preparedness are vital to ensuring uninterrupted operations and meeting our commitments to clients and regulators. We require our suppliers to have robust business continuity and disaster recovery plans in place, ensuring critical services remain reliable under all circumstances. By working together to strengthen continuity and share best practices, we can enhance mutual resilience and adapt effectively to unforeseen challenges.

We require suppliers to:

- Have business continuity and disaster recovery plans in place.
- Ensure critical services are resilient, especially where supporting Sompo International's regulatory obligations.

We recommend suppliers to:

- Regularly test and improve continuity and resilience arrangements.
- Share resilience planning insights with Sompo to strengthen mutual preparedness.

Supply Chain Responsibility

Background

At Sompo, we recognize that responsible supply chain management is essential to promoting ethical, sustainable, and resilient business practices. We require our suppliers to uphold the standards outlined in this Code throughout their own supply chains and to conduct appropriate due diligence. By fostering transparency, collaboration, and continuous improvement, we can drive positive change and strengthen the integrity of the entire value chain.

We require suppliers to:

- Apply the same standards set out in this Code to their own suppliers and subcontractors.
- Conduct appropriate due diligence on their supply chains.
- Be transparent about sourcing practices and subcontractor arrangements.

We recommend suppliers to:

- Engage with suppliers on ESG, ethics, and resilience improvements.
- Share lessons learned and innovations across the value chain.

Reporting Concerns and Whistleblowing

Background

We are committed to fostering a culture of integrity and transparency, where concerns can be raised without fear of retaliation. We require our suppliers to provide safe and confidential channels for reporting misconduct, ensuring whistleblowers are protected. By encouraging open communication and promptly addressing issues, we can work together to uphold the highest ethical standards and resolve concerns effectively.

We require suppliers to:

- Provide safe, confidential, and accessible channels for employees and stakeholders to raise concerns.
- Prohibit retaliation against whistleblowers.
- Report suspected misconduct or breaches of this Code to Sompo promptly.

We recommend suppliers to:

- Foster a culture of “speak up” supported by leadership.
- Collaborate with Sompo in investigating and resolving issues.

Monitoring and Compliance

Background

At Sompo, maintaining high standards across our operations and partnerships is essential to our success. We require our suppliers to actively cooperate with our monitoring efforts, such as audits and site visits, and to address any identified gaps promptly. By viewing compliance as a collaborative effort, we can work together to drive continuous improvement, strengthen performance, and build lasting, trusted relationships.

We require suppliers to:

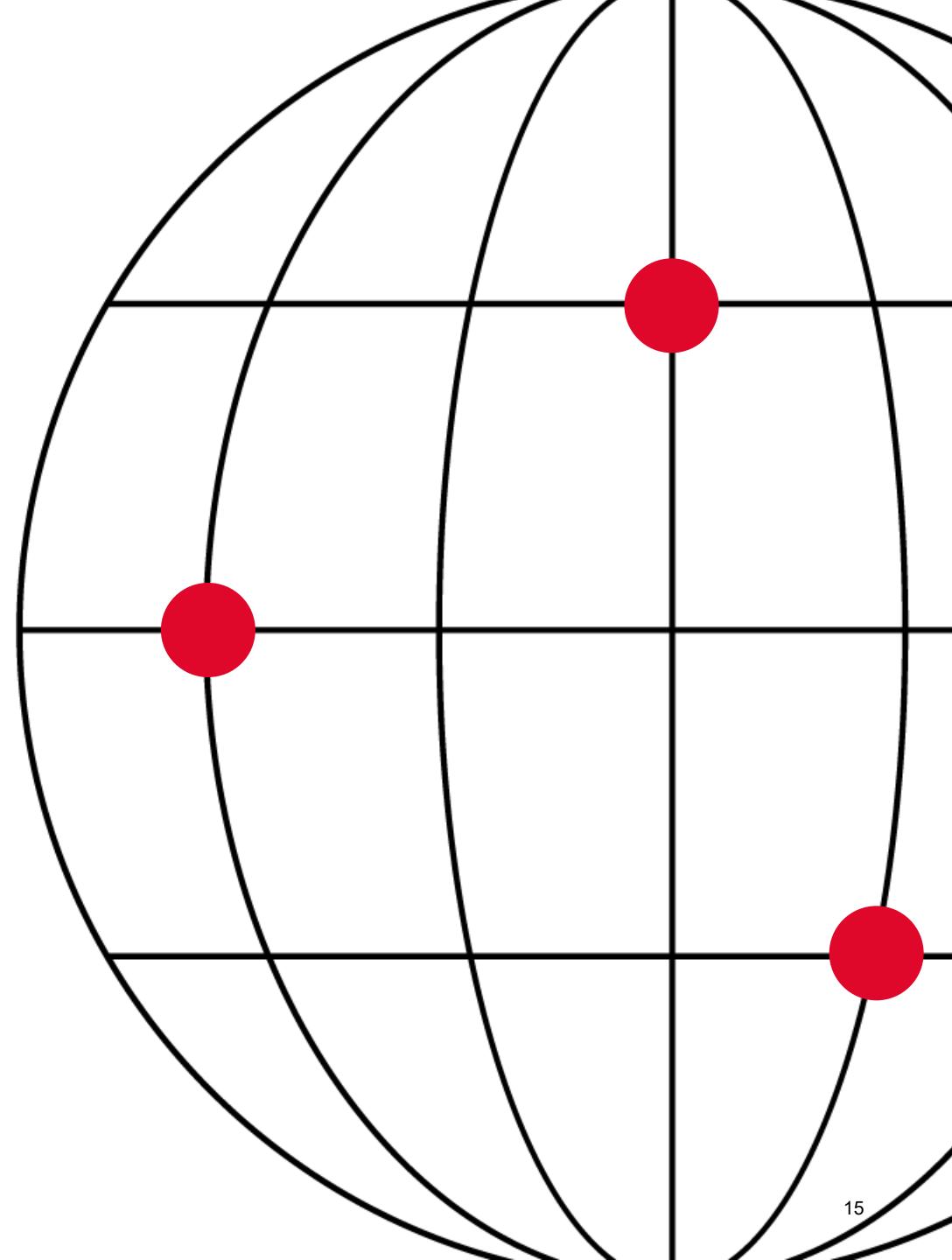
- Cooperate with Sompo's monitoring activities, including audits, questionnaires, and site visits.
- Address identified gaps through corrective action plans.
- Accept that material or repeated breaches may result in termination of the business relationship.

We recommend suppliers to:

- Share progress on compliance and continuous improvement.
- View compliance as a partnership opportunity to strengthen performance.

While this Supplier Code of Conduct is not intended to be legally binding, its purpose is to clearly outline the standards of behaviour and responsibility we require from our suppliers. Failure to meet these standards may limit future opportunities to work with Sompo. The specific legal obligations governing the relationship between Sompo and its suppliers will always be defined in the respective contracts.

Sompo reserves the right to review suppliers' policies, procedures, and supporting documentation to ensure compliance with the standards set out in this Code. By working together to uphold these principles, we can build a responsible, ethical, and sustainable partnership that benefits all stakeholders.





SOMPO