



Code of Conduct

For Clients and Suppliers

Code of Conduct

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Welcome to Wattam Kirby Mee

The WKM story began in April 2020, when four of us came together to create a business that focused on clients. We wanted to establish an independent firm that gave financial planning a modern and personal spin. We've achieved just that.

We recognised from the outset that each client is unique. Therefore, we had to make time to look at their objectives in detail to create a financial plan and investment strategy that go hand-in-hand with each other.

We are an independent firm of financial planners and investment managers. Our approach allows us to select the best in class for your specific objectives and make the most of what you have. We will do everything in our power to achieve your goal of financial freedom.

Our people are at the heart of what makes WKM so special, and each member of our small team brings their ideas and experience to the table. We have more than 125 years of combined experience in financial planning and investment management, which leaves our clients in very capable hands.

There is no corporate machine in the background. We make the decisions, we devise the plans, and we make them happen.

Our ethics and standards

WKM live by high ethical standards, ensuring we always act professionally and with strong ethical behaviours, ensuring WKM are valued and trusted as financial planning professionals and investment managers:

- We act with the highest ethical standards and integrity
- We act in the best interests of each of our clients
- We provide a high standard of service
- We treat people fairly and are non-discriminatory

As proud members of the Chartered Insurance Institute, WKM are committed to complying with setting, maintaining and supporting high professional and ethical standards in insurance and finance planning.

This commitment is unwavering and is reflected in the WKM Code of Ethics and associated policies and programs, such as our due diligence plan and its anti-corruption compliance program.

This commitment extends to our clients and suppliers, subcontractors and service providers. As partners of WKM, suppliers contribute to our corporate social responsibility.

This is the reason why WKM asks its clients and suppliers to adopt and ensure that they and where applicable their own suppliers comply with the laws, regulations and principles set out in this Code of Conduct.

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1. Objective

This Code of Conduct has three primary goals:

- To ensure that WKM operates in the global economy as a responsible business.
- To ensure that clients and suppliers are aware of and undertake to comply with the requirements and practices defined by WKM in terms of ethics and social responsibility in the areas of labour, health, safety, the environment and business integrity, as set out in the principles in articles 2, 3 and 4 below.
- To protect WKM from adverse scrutiny by governments, investors, customers and other third-party stakeholders regarding client and supplier practices.

2. Principles applicable to clients

WKM has developed the following principles to ensure a positive, ethical, and legally compliant relationship between the company and its clients. We require clients to:

- Treat WKM employee's with respect, fairness, and without discrimination or harassment.
- Act ethically and honestly in their dealings with the company, ensuring transparency and integrity in all interactions.
- Comply with all applicable laws, regulations, and legal obligations, particularly in areas such as anti-bribery, anti-corruption, and data protection.
- Respect the company's confidential information, not disclosing or misusing it.
- Adhere to health and safety regulations when engaging with the company in physical spaces.

3. Principles applicable to suppliers

WKM's suppliers must adhere to the following principles:

- Promote the best possible working conditions
- Not use child labour, forced labour or involuntary labour
- Prevent modern slavery and human trafficking
- Protect the health and safety of workers
- Support the development of workers
- Tolerate no discrimination and encourage diversity
- Respect the environment
- Prevent and avoid all forms of corruption
- Preventing and avoiding money laundering
- Respect fair competition on the market
- Avoid any conflict of interest or risk of conflict of interest
- Comply with applicable export control regulations and trade sanctions
- Maintain confidentiality of information and protect WKM's assets
- Respect privacy and personal data.

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4. Principles of corporate responsibility (suppliers only)

WKM is firmly opposed to any form of work which does not respect the fundamental principles and rights set out in the declaration of the International Labour Organisation (ILO). This is why we ask our suppliers to apply the following principles and provide their employees and workers with the necessary training concerning these principles. Suppliers must:

Child labour

Uphold the highest ethical standards and strictly prohibit the use of child labour in any form. All local and international labour laws must be adhered to, including those set by the International Labour Organization (ILO), ensuring that all individuals employed by our company and within our supply chain are of legal working age. Supplier must protect children's rights and promote their wellbeing, education, and development.

Dignity & respect

Treat their employees and workers with dignity and respect, and provide an environment free from prejudice, bullying and harassment. Bullying is offensive, intimidating, malicious or insulting behaviour intended to cause distress, offence or humiliation.

Harassment is any behaviour by one person which is found to be unacceptable or unwelcome by another, and can affect the confidence, morale, performance and even the health of the person being harassed. It is a form of discrimination, and both harassment and bullying as treated as very serious matters.

Discrimination & diversity

Foster a diverse and inclusive workplace. Any kind of discrimination must be strictly prohibited, including based on race, gender, age, religion, sexual orientation, disability, or any other characteristic protected by law. Suppliers must value diversity and create an environment that embraces different perspectives, promotes equality, ensuring opportunities for all.

Environment

Be dedicated to environmental sustainability and minimising their ecological footprint. They must be committed to responsible practices that reduce waste, conserve resources, and limit pollution throughout our operations. Suppliers should actively seek to use renewable energy, promote recycling, and adopt environmentally friendly technologies, whilst continuously improving their environmental performance and contributing to a more sustainable future for the planet.

Forced or involuntary labour

Strictly prohibit the use of forced or involuntary labour in any form and be committed to upholding human rights, ensuring that all work is performed voluntarily, without coercion, threats, or exploitation. This must be applied across all operations and supply chains and must support fair labour practices. Suppliers must be dedicated to ensuring a safe and respectful workplace for all individuals.

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Freedom of speech and association

Support and respect the rights of employees to freedom of speech and association. Promoting open communication and encouraging employees to express their views and ideas without fear of retaliation. Employees must be free to join or form associations, including unions, and participate in collective bargaining as permitted by local laws.

Remuneration and benefits

Provide fair remuneration and benefits to all employees. Ensuring that wages meet or exceed legal minimums and are aligned with industry standards, compensating employees fairly for their work. Suppliers should offer a range of benefits that promote well-being, security, and work-life balance, ensuring that our team members are supported both personally and professionally.

Safety & Security

Ensure the safety and security of all employees. Their operations must adhere to stringent safety protocols and provide necessary training to create a secure work environment. Including regular risk assessments, maintaining safety equipment, and promoting a culture of safety awareness. Suppliers must be dedicated to protecting employees from harm and ensuring their wellbeing at all times.

Working hours

Maintain reasonable working hours, including overtime, in accordance with local standards and applicable laws in the jurisdictions in which Suppliers operate. Under no circumstances may these working hours exceed the limits set by International Labour Organisation (ILO) standards.

5. Principles related to business integrity (suppliers only)

Anti-Corruption

Suppliers must comply with all legislation relating to the fight against corruption and influence peddling, such as the Sapin 2 Act, the FCPA and the UK Bribery Act, and undertake to take all measures to detect, prevent and punish all forms of corruption or influence peddling.

Confidentiality and data protection

Suppliers must maintain the highest standards of confidentiality and data protection. They must implement robust measures to safeguard sensitive information and ensure that personal and business data is handled securely and in compliance with relevant laws and regulations. Suppliers must be committed to protecting the privacy of employees, clients, and stakeholders, and to preventing unauthorised access or disclosure of confidential information.

Conflicts of interest

Suppliers must do everything in their power to prevent the occurrence of situations creating a real, apparent or potential conflict of interest in the context of their business relationship with WKM, such as, for example, situations involving close personal or family relationships with persons belonging to WKM. Suppliers are required to inform all parties concerned of a real or potential conflict of interest.

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Bribery and Gifts

Gifts as a mark of courtesy can be authorised only if they are ordinary and reasonable, of low value, offered in full transparency, in accordance with recognised business practices and ethical standards, in compliance with our anti-bribery policy and if they do not infringe any law. Under no circumstances may they be offered with the expectation of consideration and to obtain an unfair competitive advantage.

Whistleblowing

Suppliers must commit to fostering an environment where employees feel safe to report unethical or illegal activities without fear of retaliation. They must encourage the reporting of concerns through our established whistleblowing channels, ensuring that all reports are investigated thoroughly and confidentially. Supplier policies must protect whistleblowers from any form of reprisal, reinforcing our dedication to integrity and accountability throughout the organisation

6. Implementing the Code of Conduct (suppliers only)

The Code of Conduct applies to any supplier having an existing or future business relationship with WKM, and WKM shall be entitled to monitor the supplier's compliance with the requirements of the Code of Conduct and, in order to do so, shall in particular have the right to appoint an independent third party for this purpose in order to ensure that the supplier complies with and implements all applicable legal and regulatory requirements.

In the event of non-compliance with a provision of the Code of Conduct, WKM and the supplier will set up a remediation plan to be implemented by the supplier in order to correct the non-compliance observed within a period agreed in advance between the parties.

In the event of a serious breach which does not allow a remediation plan to be implemented, WKM reserves the right to terminate its business relationship with the supplier.

If suppliers have any questions regarding the Code of Conduct, they may contact the WKM in writing at Atelius House, 2 Smith Way, Leicester, LE19 1SX or by phone on 0116 403 0138.

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