

Supplier  
Code of  
Conduct

I'm delighted to share with you our first Supplier Code of Conduct.

We want to ensure that you, our suppliers, operate in a responsible, safe, sustainable way, and understand our principles and values. This code sets out a range of operational, social and ethical values that we expect you to demonstrate every single day – just like we do. We're happy for you to share our code with your employees, especially those who work on the Metro Bank account.



**JOE BAKOWSKI**  
DIRECTOR OF PROCUREMENT, SUPPLIER  
RISK AND COMMERCIAL MANAGEMENT



## Who we are

Our colleagues and people-people banking approach make Metro Bank unique. We're on a mission to become the UK's best community bank, and to make that happen we're committed to creating an amazing colleague experience.

It's based on an inclusive culture where our people feel they can be their best authentic self. Because when our colleagues reach their full potential, they provide our customers with the best possible service.

From their first interaction with Metro Bank, colleagues are engaged in our community-focused culture. They'll understand our purpose when they read the job advert online, be guided through our values during their recruitment journey, and on their first day take part in our cultural engagement programme, Visions.

## Our AMAZEING behaviours

These values are at the core of everything we do at Metro Bank. They're important to us, and we'd like our suppliers to be guided by them too.



Attend to every detail

# A

# M



Make every wrong right

Ask if you're not sure - bump it up



# A



# Z

Zest is contagious - share it around

Exceed expectations

# E



# I

Inspire colleagues to create FANS



# N

Nurture colleagues so they grow



Game change - because this is a revolution

# G



03

# Investing in our people

We help new and existing colleagues develop their skills by offering a range of talent programmes and apprenticeships. Our apprenticeships are available in customer facing roles, finance, HR and we have our very own MSc in Retail and Digital Banking. We're accredited as an employer provider, and run a Level 2 Financial Services Customer Advisor Apprenticeship Programme. In partnership with Cranfield School of Management, we also run the UK's first masters level apprenticeship for senior banking professionals.

# Rewarding our colleagues

Our colleagues are integral to growing our business, and this is reflected in our reward principles. They apply to all colleagues and are designed to reward them for high performance and retain the talent upon which our business depends. Our principles include:

- paying fair salaries and offering strong career and growth opportunities
- making everyone an owner, aligning them to the bank's long-term vision
- rewarding colleagues based on Metro Bank's culture and performance, and how they behave and deliver, both as part of the team and as an individual
- keeping reward as simple as possible with one approach for all
- taking a retail approach to variable reward, with no excessive cash bonuses or linear incentives which can skew behaviours and encourage unnecessary risk taking.

# Inspiring leadership

Our leaders encourage colleagues to be themselves each day. And this is reflected in our engagement survey results, which show that not only do colleagues feel able to be authentic at work, but also feel supported by their leaders.

To make sure our leaders are equipped to lead, we provide them with new and relevant training options. We've introduced a suite of content in a mix of self-led and virtual classroom formats. New offerings this year include a refreshed People Management Essentials series, a new senior leadership platform offering executive-level leadership learning, and content on communication and leading teams.

To support the shift from remote working to hybrid working, leaders completed a Future Ways of Working series, covering the journey of leading colleagues through change. It also included how to get the most out of hybrid working patterns and meetings. To help collaboration in a remote environment, we ran game-based assessments with teams of senior leaders, and continued to roll out our leadership programmes for both first line and senior leaders.





## Health and wellbeing

We want our colleagues to feel their best both at work and at home, which is why we continue to enhance our holistic health and wellbeing offering. All colleagues benefit from health and safety training when they join Metro Bank. They're also encouraged to participate in mental health awareness training, and have access to employee assistance. The Bank Workers Charity contact line also offers our people independent and confidential information and expert advice. To support colleague conversations, we work with partners that have also had mental health first aid training.

## Disability support

Our current approach to collecting data about disability is on a voluntary basis. This happens when colleagues join the business.

## Colleague networks

We have an impressive range of colleague networks that educate, celebrate and support the experiences of others. They include Women on Work, Mpride for our colleagues who identify as LGBTQI+, Mbrace which celebrates our ethnic and cultural diversity, Mbody for health and wellbeing, and Mparents for working parents and parents-to-be. They're open to all colleagues, regardless of race, disability, gender or sexual orientation, and each is supported by an executive sponsor, a network lead and an external coach, to offer a link between the inclusion networks and senior management. Our Inclusion Committee oversees their work and provides a holistic approach to our diversity and inclusion activities.

## Diversity and inclusion

We believe a diverse organisation with a broad range of skills, backgrounds, knowledge and experience is the best kind of organisation. We're deeply committed to promoting greater diversity and inclusion throughout the bank, and transparently reporting on our progress. Being a community bank, it's essential that we represent the communities we serve. It's this philosophy that has helped foster a culture of inclusion across our teams. Our data on gender and ethnic diversity is published in our [annual report](#), and you can read about everything we do at [metrobankonline.co.uk/diversity](https://metrobankonline.co.uk/diversity).

We recently updated our [Diversity & Inclusion policy](#), which sets out our approach to equal opportunities and outlines our commitment to provide a working environment free from harassment and bullying. It also ensures all colleagues are treated, and treat others, with dignity and respect. All managers must set an appropriate standard of behaviour, lead by example, and ensure that those they manage follow the policy and promote our aims and objectives with equal opportunities in mind.

## Our communities

As a community bank, we strive to make a positive difference through our colleagues, the local businesses we work with and the causes we support. By helping our communities thrive, we believe our business will too.

Turning customers and the communities we serve into FANS remains our purpose and is at the heart of everything we do. We have evolved in many ways over the past 10 years, but one thing has remained the same, and that's our commitment to great customer service. It's why we've been ranked #1 for store service eight times in a row by the Competition and Markets Authority in their UK service quality survey.

## Social mobility

Our work on social mobility makes us incredibly proud. We're always looking for new ways to champion equality in our communities and create career opportunities for all colleagues.

We signed the Armed Forces Covenant in 2019, and in 2021 we obtained the Gold Award as part of the Defence Employer Recognition Scheme. We offer special services to our Armed Forces customers by accepting British Forces Post Office (BFPO) addresses as proof of UK residency, offering Forces Help to Buy mortgages, and sharing our educational programme, Money Zone, with our military communities.

To support those leaving the Armed Forces, we have a market-leading approach. Our colleague reservists benefit from ten training days a year on top of their annual leave allocation, and we provide legal and mental health support. We also expanded our support in 2021, running careers events specifically for military spouses.

Helping young people learn the right skills to enter the world of work is something we're passionate about. We run workshops in schools across the South and London regions, providing CV and career advice. We also partner with Jobcentre Plus to hold CV and interview skills workshops. Our other partners include the Open University and Brunel University where we host educational events.

We also recently signed the Care Leavers Covenant which supports a diverse range of candidates who have left care and are looking for employment. We assist them with one-to-one support and guidance to get on the job ladder.

## Making a difference

All Metro Bank colleagues are able to take an annual Day to AMAZE. It's an opportunity for our people to use a normal working day to volunteer and give back to their community, through a cause of their choice. Our colleagues have volunteered their time at food banks, created beautiful gardens at hospices, and completed sponsored walks to name just a few activities. It's an incredible opportunity to get involved with our communities and make a real difference.

Is your team interested in giving back? We're always up for joining forces with our suppliers to build a stronger relationship, and together make a bigger difference. We'd love to hear from you, contact us at [suppliercodeconduct@metrobank.plc.uk](mailto:suppliercodeconduct@metrobank.plc.uk).





## Vulnerable customers

We welcome customers from all backgrounds and this reflects the broad appeal of our banking proposition. We have invested in refresher training for all Metro Bank colleagues on supporting customers with additional needs, including specialist training delivered by Money Advice Trust to our customer-facing teams. Colleagues record where our customers require additional support so that their future interactions with Metro Bank can be made even easier based on their individual circumstances.

We consider the needs of vulnerable customers across all areas of the bank, from product and service design, to communications and customer service. We constantly strive to ensure we support our customers in times of need, and try to identify opportunities to make everyday banking easier for those who need additional support. In 2021 we became a signatory to the Financial Abuse Code of Practice, and we're committed to further improving the support we offer to victim-survivors of financial abuse, helping them regain control of their finances and independence.

## Modern slavery

An important part of our philosophy is to conduct all business in an appropriate manner. Slavery, servitude, forced labour and human trafficking (modern slavery) is a crime and violation of fundamental human rights. We do not tolerate modern slavery, and are committed to acting professionally, fairly and with integrity, in all our business dealings and relationships. This includes having the right systems and controls for risk, to ensure that no modern slavery takes place in our business or in our supply chains. We're continually tracking and improving our processes in line with our Modern Slavery Policy and Statement, which you can find at [metrobankonline.co.uk/modern-slavery](https://metrobankonline.co.uk/modern-slavery).

Building and maintaining strong partnerships with you, our suppliers, is also important to us. As a supplier to Metro Bank, we expect you to comply with relevant laws and regulations, and have a robust policy in place, to identify and address the impact of modern slavery. If you're unsure about our expectations of you, or suspect of any modern slavery issues in your supply chains, please make us aware immediately.

## Our sustainability targets

We recognise that climate change is one of the biggest challenges facing society today, and understand the valuable role we can play. We're committed to working with our customers, colleagues, communities and suppliers to move towards a resilient, net zero economy.

We are focused on better understanding our indirect (Scope 3) emissions and building a roadmap to reduce the emissions linked to our suppliers and partners. We are taking further steps to build climate change considerations into our procurement and supply chain management processes - both in the selection and ongoing management of suppliers. We will focus on continued reduction in the operational emissions we already track, while extending our data capabilities to capture more of our indirect (Scope 3) emissions relating to suppliers. Initially, we will work with the suppliers with the largest footprint to gather data on their carbon emissions and to understand their plans to embed sustainability into their organisation.

# Whistleblowing

Our Whistleblowing Policy ensures that all colleagues can raise concerns they may have about the conduct of others in the business, or how the business is run, in good faith and without fear of unfair treatment. This helps protect the welfare of our colleagues and customers, as well as the success of the bank.

# Data privacy and protection

Privacy will always be a key concern for our customers and colleagues. Building on the foundations of our UK General Data Protection Regulation (UK GDPR) compliance work, we continue to review and improve the effectiveness, maturity and efficiency of our data privacy capability.

Suppliers should treat any data we share about our customers or colleagues in line with the UK GDPR compliance, and as agreed in our contract with you.

# Managing supply chain risks

We identify and manage risks that exist within our business using a robust risk management process. Some of these risks will sit with our suppliers, and we expect you to have your own controls to manage these risks. To help us assess and manage risks that sit with suppliers, we have joined forces with more than 40 other banks and financial institutions as members of the Financial Services Supplier Qualification System (FSQS). FSQS is an efficient and effective way for suppliers to provide us with information, compliance data and supporting evidence about your control environment. This is a key part of our control environment, and we believe that the FSQS community model operates for the good of both buyers and suppliers.

# Anti-bribery and corruption

We're committed to maintaining the highest standards of ethics and integrity. We have a zero tolerance approach to bribery and corruption, and take the same approach with our suppliers. We protect our customers and the bank by regularly training our colleagues on our Anti-Bribery and Corruption Policy, which includes rules around gifts and hospitality. This helps us make sure all our colleagues are conducting business in an honest and ethical way.







## Payment terms

We pay our suppliers within clearly defined terms and have proper processes for dealing with any payment issues that may arise. Our Audit Committee reviews the bank's supplier payment practices and, as required by law, we publicly report this on a bi-annual basis.

## Tax

Metro Bank is a major UK employer, investor and purchaser of goods and services. We recognise our responsibilities and make a significant contribution to the UK Exchequer each year. Society as a whole benefits from a fair, effective and predictable approach to taxation – this includes all our customers, colleagues and communities. We pride ourselves on always acting with integrity, honesty and transparency with regard to tax, and we continue to follow the highest standards of corporate governance.



Have a question or want to learn more about our Code of Conduct?  
Get in touch at [suppliercodeconduct@metrobank.plc.uk](mailto:suppliercodeconduct@metrobank.plc.uk)