

Supplier Code of Conduct Policy

2024



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1 Aim and Scope of Code

The BBI Solutions Supplier Code of Conduct Policy (the “Supplier Code”) sets out the main principles and standards that BBI expect from our suppliers, reflecting the standards that all employees and directors hold from our own Code of Conduct.

This is not intended to conflict with or modify any existing contractual terms between BBI Solutions and our suppliers. BBI intend to offer guidance for BBI’s suppliers and, should conflict arise, any existing contractual terms and conditions will take precedence.

The core principles BBI expect are:

- **Abiding by all relevant laws and regulations**
- **Providing a safe, diverse and inclusive workplace and a respect for human rights**
- **Committing to sustainability to protect our environment**
- **Supporting us in achieving our net zero targets**

Our suppliers are integral to BBI’s success, so BBI require that our suppliers respect and fully adhere to this Code, contributing towards the delivery and implementation of these expectations.

For the purposes of this Policy, “Group” or “BBI Solutions” refer to both BBI Solutions, and to the business group headed by that company, which includes all companies that are directly or indirectly controlled by BBI Solutions.

Wherever laws, practices or internal procedures applicable to the individuals and entities subject to this policy are stricter than its provisions, the former will prevail.

BBI will ensure the principles established in this policy are observed by all the companies in which it participates.

At BBI, we believe that following our values of integrity, collaboration and performance enables us to deliver excellence to our customers and maintain the trust of all of those BBI work with.

It is important to us to uphold high ethical and responsible standards and BBI expect this from end-to-end delivery, including throughout our supply chain which aligns with the United Nation Global Compact.

When working with our suppliers, BBI want to build long lasting relationships on a strong level of trust by organising our Procurement Team to support our global supply chain geographically and by material type.

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

2 Governance

2.1 Laws and Regulations

Core Principle: Abiding by all relevant laws and regulations.

BBI expect our suppliers to know and comply with all laws and regulations, national and international, relevant to their business. This principle covers those laws relating to labour, environmental laws, social laws, sourcing and trading of minerals from any conflict-affected and high-risk areas, as well as all regulations and standards set out by governing bodies.

2.2 Anti-bribery and Corruption

BBI do not tolerate bribery or corruption in any form. BBI expects suppliers to operate a zero-tolerance approach to this too, ensuring that they do not: offer, promise, give, accept or receive any bribes or any other form of inducement (gifts, payment, hospitality or entertainment). This is regardless of value, with the intention or appearance of influencing a business decision or securing an improper business advantage, whether directly or through a third party. This does include facilitation payments, even where such payments are considered part of local business practice or acceptable under local law.

2.3 Conflict of Interest

BBI suppliers should avoid any relationship, influence or activity that might impair their ability to make fair and objective decisions when performing their job. If a supplier believes there is, or may be, an actual, potential or perceived conflict of interest, BBI expects suppliers to disclose it to BBI and all other affected parties, as soon as possible. BBI also expects suppliers to provide adequate training to employees who may be exposed to the risk of conflict of interest.

2.4 Information Security

It's vital to BBI that its suppliers ensure that all sensitive data and information (including the assets and equipment on which it is processed and stored) is appropriately protected. BBI expect data and information to be correctly and clearly marked, and systems managing this to have appropriate protection. Access to classified information should be restricted to individuals with relevant formal security clearances and on a 'need to know' basis. Failing to protect sensitive and classified information is against the law and could significantly damage both the supplier's and BBI's reputation. In cases of national security, if laws are broken, the individuals involved can also face substantial fines and imprisonment.

2.5 Conflict / Responsible Minerals

BBI have an established statement, which is a formal declaration issued by a company regarding its commitment to responsible sourcing practices and efforts to prevent the use of conflict minerals in its supply chain, with respect to conflict minerals. Suppliers should establish policies and processes to reasonably assure themselves that any minerals in this category which may be contained in the products they manufacture do not directly or indirectly finance or fuel human rights abuses.

Suppliers should exercise, where required by law, due diligence on the source and chain of supply of these minerals, and at a minimum require the same from their next tier suppliers.

BBI will assess supplier code of conduct questionnaire responses around conflict minerals, assess supplier risks, implement actions and risk mitigations to seek to prevent modern slavery arising in the supply chain. If suppliers are flagged as a high risk or do not respond on conflict mineral issues, BBI will investigate if alternative suppliers are available and proceed to disengage with non-responding and risk suppliers.

BBI align with international and industry initiatives on conflict minerals such as OECD Due Diligence Guidance, Dodd-Frank Wall Street Reform and Consumer Protection Act and Responsible Minerals Initiative (RMI). BBI have reviewed our existing supply base with respect to conflict minerals and the guidance from the conflict free sourcing initiative (CFSI).

Risk mitigation is implemented at BBI by Supply Chain due diligence, adhering and complying to international standards and regulations, implementing an effective investigation or traceability system for upstream actors (smelters, traders, mines) with our approved supplier when required, supplier engagement and risk mitigation strategies. It also includes using a Conflict Minerals Reporting Template (CMRT), which is a widely used tool designed to help companies comply with regulatory requirements related to conflict minerals and to promote responsible sourcing practices.

2.6 Protection of Personal Data

BBI takes data protection extremely seriously and BBI intend to work with suppliers who feel the same about data. BBI operates across many jurisdictions and applies the principles of the UK Data Protection Act 2018 across all our entities, irrespective of location.

BBI expect our suppliers to understand how to effectively and compliantly manage our data, including holding our data securely, and only sharing our data where permission has been provided to do so. Specific arrangements will be described in the contract through a data protection clause or more prescriptive agreements, which must be applied. Due to the nature of our business, there is a requirement to notify us if there are any changes to a supplier's business such as changes in ownership or acquisitions, or if there has been an issue with processing our data by the supplier, or a sub/processor, and if this is on another contract out of courtesy.

2.7 Trade Compliance

It's essential that suppliers comply with all applicable import and export control laws and regulations including embargoes, sanctions, and antiboycott rules. BBI expects suppliers to provide information particular to their goods relating to customs and strategic exports licensing.

Suppliers must understand any sanctions, import, and export control requirements relating to their work and ensure decisions and activities comply with those requirements.

2.8 People

Core Principle: providing a safe, diverse and inclusive workplace and a respect for human rights.

2.9 Health and Safety

BBI is committed to safety first culture, and protecting our people and partners is a priority.

BBI expects suppliers to follow suit and to provide a safe, healthy and secure working environment for their employees, contractors, customers and anyone who may be affected by their activities. However, BBI recognise that the success of our business goes beyond simply following the legal requirements.

2.10 REACH Regulations

BBI have processes in place to comply with UK REACH regulations which applies to the majority of chemical substances that are manufactured in or imported into Great Britain (GB) (England, Scotland, Wales).

2.11 Diversity and Inclusion

BBI value a diverse workforce and supply chain. Our inclusive culture enables our people, suppliers, customers, and partners to operate at their best.

In line with BBI's values, suppliers are expected to:

- **Support and promote diversity and inclusion, in the workplace and with suppliers.**
- **Provide an environment free from all forms of harassment, bullying and discrimination.**
- **Work in partnership to create and sustain an inclusive working environment where everyone's innovation and unique contribution is valued.**
- **Provide equal opportunities and treatment of employees and suppliers through non-discrimination on the grounds of protected characteristics - race, disability, age, sex, gender reassignment, sexual orientation, marriage or civil partnership, pregnancy and maternity, or religion or belief.**
- **Encourage engagement with Size, Ownership and Geographically diverse Suppliers – e.g., Small to Medium Sized Enterprises (SMEs). Where appropriate, encourage commitment to Government agencies.**
- **Provide all employees with a written contract in a language they understand, clearly indicating their rights and responsibilities, wages, working hours, benefits and other working/ employment conditions.**

2.12 Human Rights

The responsibility to respect human rights is a global standard of expected conduct for all business enterprises wherever they operate.

In line with BBI's values, BBI expect:

- **Dignity and Respect:** for all employees, workers, suppliers and partners.
- **No Modern Slavery, Child Labour and Human Trafficking:** our suppliers must implement measures to ensure these are not taking place in their supply chains, or in any part of their business, ensuring all laws, regulations and acts (e.g. including but not limited to, the Modern Slavery Act and Uyghur Forced Labour Prevention Act) are adhered to.
- **Freedom of Association:** recognise and respect the rights of employees and workers to exercise lawful rights of free association, and to communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.
- **Employment Environments:** to be free from physical, psychological, and verbal harassment, or other abusive conduct.
- **Freedom of Movement:** and the ability to terminate employment, prohibiting the confiscation of workers identification documents.
- **Fair Wages:** for all employees, workers and contractors, with working hours and overtime observed.
- **Training:** provided for employees regarding the risks of modern slavery in their supply chains and sustainable procurement.
- **Grievance Mechanisms:** in place to ensure that any concerns raised by employees, workers, suppliers or partners can be reported and addressed.

2.13 External Stakeholder Human Rights

At BBI we have a set of principles that respect and protect the rights to property, land, safety, and security of all affected individuals and communities. Engagement with stakeholders should include transparent consultations and collaborations, ensuring their voices and concerns are heard and integrated into decision-making processes. Our qualitative objectives include implementing a culture of respect and understanding, and ensuring that all company actions are aligned with international

human rights standards. Our quantitative targets involve measurable targets such as zero incidents of human rights violations.

2.14 Prompt Payment Practices

BBI have made a commitment to prompt payment with our suppliers. BBI expects its suppliers to ensure that they are also paying their suppliers on time in accordance with agreed contractual payment terms. BBI encourages them to adopt and sign up to a relevant national payment code to demonstrate this commitment.

2.15 Community Engagement

BBI encourages its suppliers to engage with the communities in which they operate, to identify social value and support economic development, and to further contribute towards sustainability and deliver positive social impact.

2.16 Real Living Wage

At BBI, we have demonstrated our commitment to fair pay through our decision to seek living wage accreditation. This will ensure that every direct employee and contractors within our business, receive the real living wage as a minimum, incorporating a yearly uplift to reflect the cost of living at that time.

1.1.

BBI expects its suppliers to uphold the same standards, ensuring fair pay within our supply chain.

2.17 Planet

Core Principle: Committing to sustainability to protect our environment.

To protect our planet, BBI all need to work together. BBI recognise that BBI have an impact on the planet through our greenhouse gas emissions, the resources BBI use and the waste BBI produce.

All of us are responsible for the sustainability of our environment, so BBI expect everyone working at BBI and our suppliers to behave in a way that pro-actively addresses and reduces our impacts on the environment, biodiversity and seeks opportunities to improve the natural environment.

BBI welcome and encourage engagement and initiatives from suppliers and customers that help us to minimise our environmental impacts.

BBI have an internal steering ESG committee to engage all functions and global sites to collaborate on ESG and CSR topics and goals with support, motivation and endorsement from executive leadership at BBI.

2.18 Sustainable Procurement

Sustainable Procurement, also referred to as responsible or ethical procurement, addresses the wider impacts of an organisation's activities on the '5Ps': People, Planet, Peace, Prosperity, and Partnership.

Sustainable procurement is a strategic approach that integrates environmental, social, and economic considerations into the Company's supply chain management practices, alongside conventional

procurement considerations such as price, quality, and reliability. At its core, sustainable procurement is guided by principles of environmental stewardship, social responsibility, and ethical sourcing, aiming to minimise negative impacts on people and the planet while maximising value for the organisation. BBI have key objectives in sustainable procurement, which include environmental, labour and human rights and social aspects, collaboration with suppliers, stakeholders, and industry partners to promote transparency, accountability, and continuous improvement in supply chain practices, uphold labour standards, ensure safe and healthy working conditions, and prevent labour exploitation and discrimination. Our qualitative objectives focus on selecting suppliers that demonstrate commitment to sustainability, ethical labour practices, compliance with environmental regulations, provide fair wages, respect workers' rights to freedom of association and collective bargaining. Our quantitative objectives include targets for reducing carbon emissions and waste generation throughout the supply chain and reducing incidents of labour violations.

BBI and our supply chains need to work collaboratively, integrating purpose and corporate accountability to deliver and embed Environmental, Social Governance (ESG) principles into our procurement processes. BBI expect our suppliers to have a written Environmental Social Governance (ESG) or Sustainability Policy and that all employees are informed of and have knowledge of that document. Our term and conditions with our supplier's will detail the social and environmental considerations that we expect each supplier to abide with.

The key risks and issues at BBI around Sustainable Procurement would be lack of supply chain transparency, environmental impact, poor social and labour rights processes in supply chain, lack of ethical sourcing, lack of alternative environmentally friendly products and materials, greenwashing and lack of supplier engagement.

2.19 Sustainable Procurement Goals

- At BBI we have a set of Sustainable Procurement goals, which BBI review and monitor annually, and are integrated into procurement performance reviews, which include:
- Raising Awareness with our suppliers on the companies sustainable practices.
- Engaging with our critical suppliers around sustainable procurement and completion of code of conduct questionnaire.
- Providing sustainable procurement training to BBI buyers.
- Assessing the risk of human rights abuse, poor labour standards and modern slavery in the Group and its supply chains and requiring its material suppliers (being such suppliers which in aggregate supply an amount equal to 5% or more of cost of goods sold of the Group) to confirm that they also assess the risk of human rights abuse, poor labour standards and modern slavery in their group, employment practices and supply chains. This is accomplished by supplier engagement through a Supplier code of conduct policy and questionnaire. The data provided to BBI from the suppliers are then applied to a risk register to assess the risks and implement risk mitigation where required.

2.20 Net Zero Commitment

Core Principle: Supporting us in achieving our net zero targets.

Without you, our supplier, BBI cannot do this. As such, BBI encourages all its suppliers, including SMEs, to commit to science-based targets and reducing their emissions to net zero. By focusing on this commitment, BBI can all work together towards the UK Government's Net Zero Strategy – limiting global warming to 1.5°C above pre-industrial levels. Aside from being the right thing to do, helping us move towards a more sustainable future is key to our mutual prosperity. There is increasing customer focus on emissions levels and traceability in sourcing products and services, with future opportunities

favouring solutions with the lowest emissions, supported by evidence of sustainable practices across the value chain.

As well as reducing emissions, BBI all have a responsibility to manage our operations so that BBI limit waste to landfill (using the hierarchy of waste), prevent pollution and use resources sustainably. By collaborating and focusing together on these crucial elements, BBI will ensure the future of our businesses, communities, people, and our planet.

BBI need resilient natural ecosystems to be able to withstand the worst effects of climate change and improving biodiversity is fundamental to overall planetary health.

BBI are working towards collating and reporting data on Scope 1, 2 and 3 from 2023 including Purchase Goods & Services, Upstream Transport & Distribution and Downstream Transport & Distribution.

2.21 Business Practice

BBI expect that all individuals, within our business and our suppliers', take an active role in protecting the values, principles and behaviours outlined in this Supplier Code of Conduct.

This Code is designed to provide information to clarify the expectations BBI have of our suppliers, partners and global supply chain, setting out the minimum standards of behaviour and the practices. Adhering to this helps ensure good business practice, benefiting both our suppliers and customers.

BBI have also incorporated a clause within our supplier terms and conditions to ensure that suppliers comply with all relevant laws and mandatory policies.

BBI carry out risk analysis on our supply base and expect that suppliers flow down these principles to their own suppliers to ensure alignment across the supply chain. It is essential that our suppliers securely and accurately capture, store and retain business records when needed.

If a supplier is found to not meet the expectations laid out in this Code, BBI will review the relationship they have with BBI. Corrective action may have to be taken, subject to terms of any existing contracts.

Suppliers are initially assessed when onboarded through our approved supplier process which will assess suppliers on key values, principles and behaviours. On-site supplier audits are also requested and carried out if required.

BBI is committed to maintaining ESG compliance by participating in an annual ESG focused audit with a third party auditor, which includes Supply Chain transparency, environmental impact, social and labour rights processes in supply chain. BBI additionally complete an annual assessment with EcoVadis to obtain a Sustainability Rating which focuses on Sustainable Procurement.

If you have any feedback, comments, or queries about this Supplier Code of Conduct, please contact:

Procurement@bbisolutions.com

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2.22 Policies

You must read, understand, acknowledge and comply with this policy. The members of the Senior Leadership Team (SLT) and the Board will confirm in writing their understanding of this policy.

2.23 Raising Concerns

All colleagues have a right and a duty to raise concerns which they may have about breaches of the law or propriety by BBI. This should normally be through their Line Manager or a Director but in circumstances where this is not appropriate they may approach the HR team.

No individual who expresses their views in good faith and in line with this guidance will be penalised for doing so. Please see the Whistleblowing Policy for full details and guidance.

2.24 Policy Monitoring and Review

This policy will be monitored periodically by the organisation to judge its effectiveness and will be updated in accordance with changes in the law.