

Supplier Code of Conduct Policy

2026



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1 Aim and Scope of Code

The BBI 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.

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

This is not intended to conflict with or modify any existing contractual terms between BBI 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. 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.

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 environmental and social 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.

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.

2 Responsibilities

The procurement team is responsible for policy management, presenting annual objectives to the Senior Leadership, distributing the supplier code of conduct questionnaire, risk analysis of the supply chain and developing initiatives and tools to improve the company’s performance.

3 Business Ethics

3.1 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.

3.2 Anti-bribery and Corruption

BBI have an established statement, which is a formal declaration issued by a company regarding its commitment to conducting its business in an open, honest and ethical manner and the purpose of this policy is to prevent bribery and maintain integrity. BBI do not tolerate bribery or corruption in any form. BBI expects suppliers to operate a **zero-tolerance** approach, 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.

3.3 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.

3.4 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. BBI operates across many jurisdictions and applies the principles of the UK Data Protection Act 2018 across all our entities, irrespective of location.

3.5 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. 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 support 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 illegal use of conflict minerals 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 at BBI is implemented through supply chain due diligence, compliance with international standards and regulations, supplier engagement, and the use of investigation and traceability systems for upstream actors (e.g. smelters, traders, and mines) where required. 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.

BBI use an independent third-party accredited platform to support our due diligence process for key stakeholders. This platform enables us to conduct comprehensive background checks, including verification of identity, financial standing and potential risk factors, helping to ensure informed decision making.

3.6 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.

4 Human Rights and Labour Practices

4.1 Health and Safety

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

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 and to provide safe products and services to their customers

4.2 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).

BBI ensures REACH compliance by carefully managing and monitoring the use , of chemicals used across its operations. We work closely with suppliers to confirm that all substances are pre-registered or fully registered under REACH where required, maintain up-to-date safety data sheets and monitor regulatory updates to ensure continued compliance.

Our internal procedures also ensure that any substances of very high concern (SVHCs) are identified and managed appropriately across our product portfolio and supply chain.

4.3 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.

4.4 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.

4.5 External Stakeholder Human Rights

BBI is fully committed to respecting and promoting human rights across our entire value chain, in line with local/international human rights standards, the human rights and public liberties included in the Universal Declaration of Human Rights, the voluntary principles of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. We expect all suppliers, partners and third-party stakeholders to uphold the same high standards, including the elimination of forced labour, child labour, modern slavery, discrimination and unsafe working conditions.

Due diligence procedures are in place to assess, prevent and mitigate human rights risks in our supply chain, including supplier risk assessments, corrective action plans and continuous monitoring. We maintain transparent grievance mechanisms accessible to external stakeholders and ensure reported concerns are addressed promptly and effectively.

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 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 supplier actions are aligned with international human rights standards. Our quantitative targets involve measurable targets such as zero incidents of human rights violations year on year.

4.6 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.

4.7 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.

4.8 Living Wage / Minimum Wage

At BBI, we have demonstrated our commitment to set actions to promote wage equality in the workplace by conducting statutory reporting and regularly analysing salary data to identify and address pay disparities across different demographics. 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.

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

5 Environmental Responsibility

5.1 Environment

Core Principle: Committing to sustainability to protect our environment.

BBI recognise that BBI have an impact on the environment through greenhouse gas emissions, the raw and natural 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 Environmental Social and Governance (“ESG”) committee to engage all functions and global sites to collaborate on Environmental Social and Governance (“ESG”) and

Corporate Social Responsibility (“CSR”) topics and goals with support, motivation and endorsement from executive leadership at BBI.

5.2 Environmental and Social Targets

Core Principle: Supporting us in achieving our environmental and social 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 Paris Agreement Treaty – limiting global warming to 1.5°C or WB2°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 collating and reporting data on Scope 1, 2 and 3, which includes all applicable categories including Purchase Goods & Services, Upstream Transport & Distribution and Downstream Transport & Distribution.

5.3 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 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.

5.4 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.

Our qualitative objectives focus on:

- Selecting and collaborating with suppliers that demonstrate commitment to sustainability, ethical and social practices and compliance with environmental regulations.
- 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.

Our quantitative objectives include:

- 100% Compliance with Conflict Mineral Regulations and Law year on year
- 100% Compliance with Modern Slavery, Child and Forced Labour Regulations and Law year on year
- >70% Supplier Engagement in Supplier Code of Conduct Questionnaire by 2030
- 100% Compliance with Packaging and Sustainable Product Regulations year on year by 2030
- >70% Sustainable Secondary and Tertiary Packaging by 2030
- >80% management and monitoring of market fluctuations (PPV) based on spends
- 10% reduction in transportation costs (upstream and downstream)

Key Performance Indicators are reviewed and monitored annually.

6 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.

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.

Suppliers are additionally assessed through our Supplier Code of Conduct Questionnaire that is distributed to a selection of suppliers based on spends and suppliers who are based in high-risk geographies. Responses from these questionnaires are risk assessed internally within a risk register to support future decision making within our supply chain.

BBI carry out risk analysis on our supply chain 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.

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:

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6.1 Consequences of Non-Compliance

At BBI, we take our Supplier Code of Conduct seriously and expect all suppliers to adhere to the standards outlined. Failure to comply may result in corrective actions, including the requirement to implement improvement plans, suspension of business activities or in severe or repeated cases, termination of the business relationship. BBI reserves the right to conduct audits and investigations to ensure ongoing compliance and to safeguard the integrity of our supply chain.

6.2 Raising Concerns

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

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.

6.3 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.