



Boortmalt Supplier Code of Conduct

INTRODUCTION:

BOORTMALT pursues a responsible purchasing policy consistent with its business ethics, respect for fundamental worker rights, and environmental standards, all of which are key conditions for doing business with BOORTMALT.

This BOORTMALT Supplier Code of Conduct is informed by the International Bill of Human Rights and the UN Guiding Principles on Business & Human Rights, the principles concerning fundamental rights set out in the International Labour Organization's (ILO) Declaration on Fundamental Principles, Rights at Work and the 2015 Modern Slavery Act.

EXPECTATIONS FOR SUPPLIERS:

As a minimum, all our Suppliers must comply with this Supplier Code of Conduct. They are expected to ensure that these obligations are already in place or there is a clear time-line for full implementation within their own organisation and their associated Suppliers and sub-contractors.

BOORTMALT is committed to the highest standards of business integrity and as a result will not tolerate any practice that is inconsistent with the principles of honesty, integrity and fairness, BOORTMALT reserves the right to audit any of its Suppliers and their sub-contractors to confirm that the requirements set out in this Code of Conduct are in force. Failure to permit such an audit may result in the termination of any supply contract with BOORTMALT.

Should any audit identify any levels of non-compliance to this Code of Conduct, the Supplier will be required to provide a detailed remedial action plan within thirty days, which must be presented to the relevant BOORTMALT site management. If the Supplier refuses to comply with the action plan, BOORTMALT reserves the right to terminate the commercial relationship.

Where compliance with this Supplier Code of Conduct could lead to a conflict with or a violation of applicable laws or regulations, the Supplier shall promptly notify BOORTMALT of the situation and explain how it intends to operate in a responsible manner.

THE SUPPLIER AGREES TO COMPLY FULLY WITH THE FOLLOWING:

BUSINESS ETHICS

All commercial exchanges with our Suppliers are based on an honest basis across all aspects of their operations both internally and externally. All transactions will comply with applicable laws and be built on transparency, strict business practices, confidentiality and freedom of competition.

The Supplier and its sub-contractors will have in place the appropriate business ethics, policies and procedures. Suppliers must be committed to the highest standards of ethical conduct when dealing with Workers, Suppliers and Customers.

ENVIRONMENTAL POLICIES

All our Suppliers are required to comply with all local applicable laws related to environmental issues. We strongly encourage our Suppliers to develop a sustainable environmental policy, which aims at reducing waste and minimising the environmental impact of their operations. The Supplier will provide BOORTMALT with details of their environmental policy on request.

The Supplier agrees to;

- Act in accordance with the applicable statutory and international standards regarding environmental protection;
- Minimise environmental pollution and make continuous improvements in environmental protection;
- To set up or use a reasonable environmental management system and demonstrate a commitment to reducing their environmental impact;
- When requested provide details of their carbon emissions to BOORTMALT.

PROHIBITION OF CORRUPTION AND BRIBERY

BOORTMALT conducts its business in accordance with the highest standards of ethical behaviour in accordance with all applicable laws and regulations; therefore it expects its Supplier will:

- Comply with international anti-bribery standards as stated in the United Nations Global Compact Principle 10 and local anti-corruption and bribery laws including, The UK Bribery Act 2010 and all other applicable local law;
- Not offer services, gifts or benefits to BOORTMALT employees in order to influence the employee's conduct in representing BOORTMALT in any jurisdiction;
- Maintain adequate procedures to prevent employees performing services on their behalf from paying and receiving bribes.

RESPECT FOR THE BASIC HUMAN RIGHTS OF EMPLOYEES

BOORTMALT Suppliers must act in line with local legislation, the principles of the United Nations Global Compact, the UN Guiding Principles on Business & Human Rights, the UN Universal Declaration of Human Rights, the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

The Supplier agrees to:

- Promote equal opportunities for, and treatment of its employees irrespective of race, nationality, social background, disabilities, sexual orientation, pregnancy or maternity, political or religious conviction, sex, age; marital or civil partnership status or any other factor which cannot be justified;
- Not employ or make anyone work against their will or under circumstances in which their labour may be coerced and exploited;
- Respect the personal dignity, privacy and rights of each individual;
- Refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination

- Prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- Provide fair remuneration and guarantee the applicable national statutory minimum wage, union agreements or industry standards;
- Recognize, as far as legally possible, the right of free association of employees and neither favour nor discriminate against members of employee organizations or trade unions;
- comply with all relevant local laws and regulations.

HEALTH AND SAFETY OF EMPLOYEES

BOORTMALT expects our Suppliers to strive to implement the standards of occupational health and safety at a high level. The Supplier must comply with occupational health and safety regulations and provides a work environment that is safe and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work related illnesses.

The Supplier agrees to;

- Take responsibility for the health and safety of its employees;
- Control hazards and take the best precautionary measures against accidents and occupational diseases;
- Provide documented training and ensure that employees are educated in health and safety issues;
- Set up or use an occupational health & safety management system.
- Comply with all relevant local laws and regulations.

SUPPLY CHAIN DIVERSITY

To deliver an effective and sustainable supply chain, BOORTMALT seeks to engage diverse and inclusive Suppliers within the local communities where we operate. BOORTMALT expects its Suppliers to demonstrate a diverse workforce composition actively embracing workforce age, gender, race, national or ethnic origin, religion, language, political beliefs, sexual orientation, physical ability and promoting supply chain inclusion throughout their own supply chains.

The Supplier agrees to:

- Use reasonable efforts to promote among its Suppliers compliance with the principles of this Code of Conduct;
- Provide BOORTMALT with details of their diversity and inclusion policy when requested and provide evidence of how this policy is put into practice, when requested;
- Be committed to ensuring its own Supplier selection processes are transparent, objective and non-discriminatory and provide fair and equal opportunities for all organisations including Small and Medium Enterprises (SMEs), Black Asian and Minority Ethnic (BAME), and organisations owned by under-represented groups;
- Confirm the ability to report periodically to BOORTMALT on workforce demographics and other diversity related issues as requested;

- Give robust consideration to the economic, environmental and social consequences of its choice of design, materials, manufacture, production, logistics, service delivery, operation, maintenance, recycling and disposal and to how best to address these consequences.

SCREENING OF EMPLOYEES

Suppliers must undertake employee pre-employment screening in line with the relevant industry standards for all employees who provide services to BOORTMALT.

BUSINESS CONTINUITY PLANNING

The Supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses). This preparedness especially includes disaster recovery plans to protect both employees and the environment as far as reasonably possible from the effects of possible disasters that arise within the domain of operations.

RECORD ACCURACY AND RETENTION

The Supplier shall ensure that business records relating to BOORTMALT are securely retained for the period required by law, and that they accurately and fairly reflect all business transactions.

DATA PROTECTION

The Supplier shall ensure compliance with laws and directives providing for the protection, transfer, access and storage of personal information.

GOVERNMENT, MEDIA AND INVESTOR RELATIONS

The Supplier shall not instigate any form of publicity or make any statement or submission to investors, the media or government referring to BOORTMALT, without first obtaining prior written permission from BOORTMALT (except where required by Government or under the law or contractually agreed). The Supplier must submit any such request to BOORTMALT Group Communications Manager for appropriate authorisation.

REPORTING BREACHES OF THE CODE

All Suppliers are expected to self-monitor their compliance with this Supplier Code of Conduct. In the first instance, known or potential breaches should be reported to BOORTMALT.

MANAGEMENT COMMITMENT

The Supplier's board must commit to adopting or establishing a system designed to ensure compliance with this Supplier Code of Conduct and applicable laws and regulations, identify and mitigate related operational risks and facilitate continuous improvement.