

Supplier Code of Conduct Policy





Revision Log

Revision Number	Nature of Revision	Revised By	Date
01	First documented	P. Le Gallez	07/06/2024
02	Updated to include various additional requirements	A. Carroll	02/02/2026

CODE OF CONDUCT

The BCW supplier Code of Conduct describes the principles and policies that all BCW suppliers should apply when conducting business with BCW.

It is BCW's policy to conduct business in compliance with the law and widely accepted norms of fairness and human decency and we expect our suppliers to act similarly. As a condition of doing business with BCW, we expect our suppliers to conform to these requirements and expect their sources in the supply chain to do so as well.

We will assess adherence to these requirements and ongoing performance in meeting these requirements when making sourcing decisions. BCW suppliers are encouraged to correct non-compliance issues identified during assessments.

If a supplier refuses or is unable to correct the non-compliance to our satisfaction, we reserve the right to terminate our relationship.

All requirements of BCW's Supplier Code of Conduct Policy should be flowed down to all sub-suppliers and subcontractors, within our supplier's supply chains.



LABOUR AND HUMAN RIGHTS

Human Rights

- BCW suppliers will uphold the human rights of employees and treat them with respect and dignity as understood by the international community. BCW suppliers are encouraged to develop lawful workplace apprenticeship programs for the educational benefit of their community, provided that all participants meet the minimum age requirements.

Forced Labour

- BCW suppliers are prohibited from using slave or involuntary labour of any kind such as prison labour, indentured labour, bonded labour, or otherwise. This includes the transportation, harbouring, recruitment, transfer or receipt of persons by means of threat, force, coercion (such as holding or withholding passports or travel documentation), abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Child Labour

- BCW suppliers will ensure that their hiring practices comply with applicable laws and regulations and meet international best practices and standards. Only workers who meet the applicable minimum legal age requirement in the country where they are working, may be hired by a supplier. Workers under the age of 18 should not perform hazardous work and should be restricted from night work if it interferes with educational needs. Internships that are part of a development program for young people may be an exception to the age requirements, if allowed by local law.

Anti-discrimination

- BCW suppliers shall not subject any person to discrimination (including hiring, salary, benefits, advancement, discipline, termination, or retirement) based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, marital status, maternity, medical condition, or social or ethnic origin. BCW believes in diversity and inclusion and bringing together people of different races, gender, education, language, viewpoints, and skills sets and experience enables ideas and innovation to flourish and expects its supply chain to uphold these values as well.



LABOUR AND HUMAN RIGHTS

Harassment and Abuse

- BCW suppliers shall treat every employee with respect and dignity and shall not allow any employee to be subject of physical, sexual, psychological, or verbal harassment or abuse.
- BCW suppliers shall ensure that their employees have access to fair and transparent grievance procedures and that all employees are protected from retaliation, for any grievances that they raise.

Wages and Benefits

- BCW suppliers will meet all applicable wages and benefits regulations, at a minimum. In any event, wages and benefits should be enough to meet basic needs. For each pay period, the supplier will provide workers with an understandable wage statement that includes sufficient information to verify accurate compensation for work performed

Equal Rights

- BCW suppliers will ensure that all stakeholders are afforded equal rights, irrespective of gender, disability, nationality, ethnic origin, religious belief and / or sexual orientation. The rights of minorities and indigenous peoples shall be safeguarded. All of the above rights shall be ensured during the undertaking of ethical recruitment procedures.

Ethics escalation

- BCW suppliers will ensure that a robust ethics escalation or whistleblowing procedure is implemented and communicated to all applicable stakeholders. Those stakeholders who make disclosures under the ethics escalation policy shall be effectively protected from retaliation.



LABOUR AND HUMAN RIGHTS

Fair Working Hours

- While it is understood that overtime is often required, BCW suppliers will manage operations in compliance with the law (local) and ensure that overtime does not exceed levels that create inhumane working conditions. Workers will also be compensated

Freedom of Association and Collective Bargaining

- BCW suppliers will recognize the right of workers to join or to refrain from joining associations of their own choosing and the right to collective bargaining, unless otherwise prohibited by law. In all cases, worker rights to open communication, direct engagement, and humane and equitable treatment must be respected.

Subcontractor Compliance

- BCW suppliers agree that any work performed by subcontractors at the supplier's facilities will be treated in the same manner and consistent with the principles set forth in this Supplier Code of Conduct.

Compliance Requirements

- Always maintain recruitment records and immigration documents.
- Always maintain payroll records documenting wages, overtime and hours worked.
- Make sure official documentation that verifies a worker's date of birth, employment history and training history is adequately maintained.



HEALTH & SAFETY

Healthy and Safe Working Conditions

BCW suppliers shall comply with applicable environmental laws and regulations and provide a safe and healthy working environment to prevent accidents and injury to health occurring within or arising out of the course of work, or as a result of the operation of employer facilities.

Compliance Requirements:

- Know and comply with applicable health and safety regulations.
- Provide all required training for employees, contractors and others and ensure the effectiveness of such training in a timely manner.
- Set appropriate safety procedures to avoid injuries and any unsafe working conditions.
- Provide the necessary personal protective equipment to the supplier's workforce.
- Track and report occupational injuries and illnesses.



ENVIRONMENT

Environmental Sustainability

BCW suppliers shall comply with all applicable health, safety and environmental laws and regulations when conducting business.

By way of example, suppliers shall:

- Consider the use of renewable energy sources, wherever possible in order to promote sustainable resource management and decarbonisation.
- Obtain and keep all current required environmental permits and registrations.
- Reduce, control and/or eliminate wastewater, waste and pollution at the source.
- Reduce, control, and/or eliminate air emissions of volatile chemicals, corrosives, and combustion products to reduce greenhouse gas emissions.
- Consider the effects to soil quality, animal welfare, deforestation and biodiversity in its decision-making processes.
- Ensure that their products comply with the applicable labelling requirements.
- Operate waste-reduction strategies which focus upon circular models encouraging reduction, reuse and recycling of resources.
- Identify, manage, store, move and handle hazardous substances in accordance with all applicable laws
- Seek to minimize noise emissions.

Compliance Requirements

- Keep all records related to the environmental laws and regulations that you are required to retain to comply with local law in the countries you operate.



ETHICS

Anti-corruption

Suppliers will conduct their businesses without engaging in corrupt practices, including public or private bribery or kickbacks. Suppliers will maintain integrity, transparency and accuracy in corporate record keeping. In the event that an BCW employee solicits or requests a kickback, personal favour (loans, jobs for family members etc.), suppliers will contact a company representative to report the request, even if they declined to offer or pay a kickback.

Gifts, Entertainment and Offers of Hospitality

- BCW does not prohibit suppliers from providing any gift or offer of hospitality to BCW employees or contractors if it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits. Further, any gifts or hospitality must:
- Comply with local law and be given in our name, not in your name.
- Not include cash or a cash equivalent (such as gift certificates or vouchers).
- Be appropriate for the circumstances.
- Be given openly, not secretly.

No unfair business practices

BCW suppliers will act with integrity and lawfully in the proper handling of competitive data, proprietary information and other intellectual property, and comply with legal requirements regarding fair competition, antitrust, and accurate and truthful marketing.



ETHICS

Avoiding Conflicts of Interests

BCW suppliers must do business in a way that is open, transparent and with the highest integrity. Suppliers are required to disclose any type of situation that might create a conflict of interest and harm the business relationship. Some common examples of conflicts of interest are situations where a supplier's employee is related to a member of the BCW workforce. It can include a BCW employee (or a family member) having a financial interest in a BCW supplier

Disclosure of intention to subcontract

The supplier shall undertake to inform BCW Group of any manufacturing processes or special processes which shall be subcontracted in whole or in part to a third-party. BCW Group reserves the right to amend or cancel contracts, in the event that subcontractors are to be used, who were not disclosed during the original bidding process.

Maintenance of international sanctions

The supplier shall not undertake any activity or deception intended to circumvent or undermine sanctions placed upon any nation, state, entity or person, enforced by the United Nations.

Compliance Requirements

- Promptly notify BCW if you become aware of any improper business courtesy provided to one of our employees and vice versa.
- Promptly notify BCW if you become aware of any relationship that could appear to be a potential conflict of interest.
- Promptly notify BCW of any illegal boycotts or any other type of coercive behavior that might harm the business relationship.



PERSONAL DATA, CONFIDENTIAL INFORMATION, AND SECURITY MEASURES

Privacy and Information Security

BCW suppliers must comply with applicable laws, rules, and regulations of the jurisdictions in which they operate regarding privacy and information security. In addition, they must:

- Use information obtained through their relationship with BCW only for the purpose defined to them.
- Store information as agreed with BCW and ensure that they have and continue to have in place appropriate information security policies and procedures to secure access to BCW information and notify BCW promptly of actual or suspected privacy breaches, security breaches, or losses of BCW information.

Compliance Requirements

- Do not print or download confidential BCW documents without permission from a BCW contract manager or the appropriate document owner.
- No BCW confidential information should be stored in USB drivers, nor should it be transmitted using unsecure methods.
- In order to protect BCW confidential information, use the watermarks 'restricted confidential', 'confidential', 'Internal Use Only' or, if applicable, 'Public Information'.
- If you are handling BCW private employee, supplier, or customer data, you will ensure that you have information security safeguards in place to protect that information the extent of applicable data privacy laws.
- In the event of a suspected or actual data privacy breach, you will notify BCW immediately.



MANAGEMENT SYSTEMS

Management System

- BCW suppliers shall adopt or should have a management system designed to ensure:
- Compliance with applicable laws, regulations and customer requirements related to supplier's operations and products.
- Conformance with this Supplier Code of Conduct.
- Identification and mitigation of operational risks related to the areas covered by this code.
- Protection of their customers from the receipt of counterfeit parts
- The adherence to export controls, legally required in the organisation's nation(s) of operation
- The management system should also drive continual improvement.
- Management systems to manage and incentivise positive social and environmental performance



REPORTING FIDELITY

Financial Reporting

BCW suppliers shall ensure that any financial reports, submissions or disclosures are accurate and are not deliberately stated or formatted in order to mislead stakeholders.

ESG / CSR Reporting

BCW suppliers shall ensure that any environmental and social governance reports, or submissions and disclosures relating to corporate and social responsibility are accurate and are not deliberately stated or formatted in order to greenwash or to mislead stakeholders.

Legal Reporting

BCW suppliers shall ensure that any reports, submissions or disclosures required by the laws of the territories in which they operate are accurate and are not deliberately stated or formatted in order to greenwash or to mislead stakeholders.



CONFLICT MATERIALS

In BCW Conflict of Minerals policy, suppliers are expected to supply materials which are 'CAHRAs Conflict Free' from the countries defined in the below hyperlink.

Suppliers are expected to adopt policies and management systems with respect to conflict minerals and to require their suppliers to adopt similar policies and systems. BCW expects suppliers to establish their own due diligence program to ensure conflict-free supply chains.

If BCW determines that a supplier's efforts to comply with this policy have been deficient and the supplier fails to co-operate in developing and implementing reasonable remedial steps, BCW reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.

<https://www.cahraslist.net/cahras>



MONITORING AND COMPLIANCE

To ensure compliance with our Supplier Code of Conduct, BCW shall have the right to monitor suppliers through audits by third parties and visits by BCW personnel. We seek relationships with suppliers that are committed to manufacturing BCW products under fair and safe labour conditions and sound environmental practices. If we determine that a particular supplier does not comply with this Code, we typically strive to work with the supplier to develop and implement an appropriate corrective action plan. Nevertheless, depending upon the nature of the non-compliance, BCW reserves the right to end its relationship with a supplier that produces and/or delivers BCW products at any time for failing to adhere to our Supplier Code of Conduct.



REPORTING CONCERNS

- If you become aware of a situation that may involve a violation of this Supplier Code, you have a responsibility to report it to BCW. BCW will treat all reports confidentially to the extent possible, consistent with the applicable law and BCW policies. A thorough investigation might be needed, and suppliers will be expected to assist BCW in these reviews by sharing information or providing access to relevant data. All reports will be investigated promptly and thoroughly.
- You can make a report by reaching out to your BCW point of contact, another BCW employee in a position of authority, or by accessing
- procurement@bcwgroup.co.uk

As a supplier of BCW, I confirm that our business operations will be conducted in accordance with the requirements set out in this code of conduct.

Company name: _____

Signed by: _____

Date: _____

Signature: _____