



Supplier Code of Conduct

Introduction

BI WORLDWIDE (“BIW”) is committed to the highest standards of integrity and social responsibility, and BIW expects all its Suppliers engaged in providing products and services to BIW (“Suppliers”) to have, or to make, a similar commitment.

The BIW Supplier Code of Conduct (“Code”) describes BIW’s expectations of how its Suppliers conduct business. BIW expects Suppliers to act in accordance with the Code, and at a minimum requires that all Suppliers comply with applicable laws and regulations within the geographies where they operate, and be open and cooperative with the regulators enforcing such laws. In instances where expectations outlined in the Code differ from local laws, Suppliers must follow these expectations within the bounds of applicable local laws.

Overview

The Code reflects BIW’s values and sets forth what it expected of its Suppliers with respect to the following topics:

1. Ethics and integrity
2. Data privacy and security
3. Inclusion, diversity & working conditions
4. Environment

Supplier Code of Conduct

Ethics and integrity

BIW is committed to the highest ethical standards and compliance with all applicable laws, rules, and regulations. In particular, BIW requires Suppliers to adhere to the following standards:

Bribery and anti-corruption

Suppliers must fully comply with requirements of all applicable bribery and anticorruption laws (e.g. U.S. Foreign Corrupt Practices Act, UK Bribery Act).

Gifts and entertainment

Suppliers must not offer or accept any gift to obtain improper advantages or influence for the Supplier, BIW (such as BIW’s employees and their family members and associates), or any third party. Gifts include a benefit, fees, commissions, dividends, cash, gratuity, services, or any inducements. Non-retaliation for reports of concern BIW expects Suppliers to have a policy and process for reporting of workplace concerns. The policy and process should be transparent and understandable, and should protect reporting and participating individuals from retaliation.

Data privacy and security

BIW requires its Suppliers to protect the privacy of individuals and the security of confidential assets and information.

Confidential assets and information

Suppliers must protect BIW’s and its clients’ confidential assets and information. Suppliers must design and maintain processes to provide appropriate protections for this information.

Personal information and privacy

BIW requires Suppliers to protect personal information in compliance with all applicable local laws, as well as regulations such as (but not limited to) the EU General Data Protection Regulation (“GDPR”) and the California Consumer Privacy Act (“CCPA”). Personal information provided by or on behalf of BIW should only be used, accessed, and disclosed as permitted by the Supplier agreement.

Inclusion, Diversity & Working Conditions

BIW fosters an inclusive culture and believes diversity should be celebrated and discrimination of any form should not be tolerated. **BIW is committed to upholding the human rights of all workers and treating them with dignity and respect.**

Non-discrimination and diversity

Suppliers must comply with all applicable laws relating to discrimination in hiring, employment practices, and harassment and retaliation.

BIW expects Suppliers to operate workplaces free of discrimination, harassment, victimization, and any other abuse on any grounds including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, or veteran status.

Modern slavery / human trafficking

BIW does not tolerate slavery, forced labor, or human trafficking in any form. BIW requires Suppliers to fully comply with the applicable legal requirements of slavery, forced labor and human trafficking laws (e.g. UK Modern Slavery Act 2015), and expects Suppliers to enact practices to ensure compliance with such laws.

Child labor

BIW does not tolerate child labor in any form. Suppliers must act in compliance with all laws regulating minimum working age for each position, including any laws pertaining to the employment, apprenticeships, and internships of youths and students.

Human rights

BIW does not tolerate human rights violations in any form. BIW expects Suppliers to enact practices to maintain a respectful and safe workplace. BIW expects Suppliers to not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying or harassment of any kind.

Employment laws

Suppliers must comply with all applicable local wage and labor laws. BIW expects Suppliers to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch and outsourced labor shall be in accordance with local law.

Wellbeing, health, and safety

BIW expects Suppliers to implement sound health and safety practices across business operations. Health and safety Suppliers must comply with all applicable health and safety laws and regulations. BIW expects Suppliers to adopt practices to minimize health and safety risks, support accident prevention, and ensure a safe workspace for all workers.

Environment

BIW is committed to reducing the impact of its operations on the natural environment and working with its Suppliers to do the same.

Environmental footprint

Suppliers must comply with all applicable environmental laws and regulations. BIW expects Suppliers to measure, manage, and address energy usage and greenhouse gas (GHG) emissions. And, where applicable, expects its Suppliers to measure, manage and reduce water and waste in its operations.

Compliance with the Code

Violations

Suppliers are required to promptly report, to their BIW contact, legal violations or violations of the Code or other BIW policy. Suppliers must promptly forward to BIW, if permitted by law, any subpoenas, regulatory requests, media inquiries, or other third-party requests concerning BIW. BIW will keep the reported information confidential, provided it does not hinder any investigation and is permitted to do so by law.

BIW's Rights

BIW reserves the following rights to ensure and enforce Suppliers' compliance with the Code.

Supplier selection

BIW will evaluate Suppliers' compliance with the Code during the Suppliers' evaluation and selection process, or upon BIW's request.

Supplier assessment

During the Supplier certification process, Suppliers will be required to acknowledge receipt and intent to comply with the Code. Suppliers may be asked to re-affirm compliance with the Code periodically.

Violations and termination

Supplier shall ensure that its subcontractors, if any, comply with the Code, and acknowledge that it is responsible for its subcontractors' violations. In the event of non-compliance with, or violation of, the Code, BIW may give the Supplier a reasonable opportunity to respond with proposed corrective actions, unless the violation is severe or incurable, or there is a violation of law. BIW may suspend or terminate its relationship with the Supplier and/or disclose the matter to the appropriate authorities if there is a violation of law.

Order of Precedence; Changes to the Code

The Code is not meant to, and does not, supersede any applicable law, or any term in an agreement between BIW and a Supplier. To the extent there is any conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement controls. BIW reserves the right to update or change the Code requirements upon notice.

We will continue to update this policy to stay current with our employee, customer, supplier and other stakeholder input. We invite you to visit our Corporate Social Responsibility page at [Corporate Social Responsibility \(biworldwide.com\)](http://biworldwide.com)