

## Bell & Bain Supplier Code of Conduct

### 1. Purpose and Principles

Bell & Bain Ltd is committed to conducting business responsibly, ethically and sustainably.

As one of the UK's longest-established print companies, Bell & Bain expects all suppliers, contractors, subcontractors and service providers to uphold high standards of integrity, human rights, labour standards, environmental stewardship and ethical business conduct throughout their operations and supply chains.

Bell & Bain seeks to work with qualified, accredited and ethically responsible suppliers whose values align with our commitments to human rights, ethical business conduct, quality, sustainability and continual improvement. This Supplier Code of Conduct establishes the minimum standards required of all suppliers and forms part of Bell & Bain's supplier approval, monitoring and governance framework.

### 2. Scope

This Code applies to:

- Suppliers of goods and services.
- Contractors and subcontractors.
- Agency and labour providers.
- Logistics and transport providers.
- Outsourced service providers.
- Suppliers' own subcontractors and supply chains.

Compliance with this Code is a condition of doing business with Bell & Bain Ltd.

### 3. Legal Compliance

Suppliers shall:

- Comply with all applicable local, national and international laws.
- Meet contractual obligations agreed with Bell & Bain.
- Maintain awareness of relevant legislation affecting their operations.
- Operate in accordance with recognised international labour, human rights and ethical business standards.

This includes legislation relating to:

- Employment.
- Human rights.
- Health and safety.
- Environmental protection.
- Anti-bribery and corruption.
- Competition law.
- Data protection.
- Modern slavery and human trafficking.

### 4. Labour Standards and Human Rights

Bell & Bain expects suppliers to respect internationally recognised human rights principles, including:

- UN Universal Declaration of Human Rights.
- ILO Core Labour Conventions.
- ILO Convention 138 (Minimum Age).
- ILO Convention 182 (Worst Forms of Child Labour).
- ETI Base Code.
- UK Modern Slavery Act 2015.

#### 4.1 Freely Chosen Employment

Suppliers must ensure:

- No forced labour.
- No bonded labour.
- No involuntary labour.
- No human trafficking.
- No prison labour.
- No worker deposits.
- No retention of passports, identity documents or personal documents.

Workers must be free to leave employment with reasonable notice without fear of penalty, coercion or retaliation.

#### **4.2 Child Labour**

Suppliers must:

- Comply with minimum legal working age requirements.
- Verify worker age before employment.
- Prohibit child labour in all forms.
- Maintain records demonstrating age verification.

No worker below the legal minimum age shall be employed.

#### **4.3 Young Workers**

Where workers under 18 years of age are employed, suppliers must:

- Conduct suitable risk assessments.
- Protect young workers from hazardous work unless permitted by law and supported by suitable risk assessment, supervision, training and safeguards.
- Provide appropriate supervision and training.
- Ensure work does not negatively impact education, wellbeing or development.
- Implement additional safeguards appropriate to their age and experience.

#### **4.4 Wages, Benefits and Working Hours**

Suppliers shall:

- Pay at least legal minimum wages.
- Ensure all work is properly compensated.
- Provide clear and understandable wage statements.
- Comply with applicable working-time legislation.
- Ensure overtime is voluntary.
- Provide adequate rest periods and leave entitlements.
- Avoid excessive working hours.

#### **4.5 Freedom of Association**

Suppliers shall respect workers' rights to:

- Join or not join trade unions.
- Elect worker representatives.
- Engage in collective bargaining, where permitted by law.
- Raise concerns without fear of retaliation.

#### **4.6 Equality, Diversity and Dignity at Work**

Suppliers must ensure:

- Equal opportunity and fair treatment.
- No discrimination.
- No harassment.
- No bullying.
- No intimidation.
- No inhumane treatment.

Employment decisions must be based on merit, competence and lawful business requirements.

### **5. Health and Safety**

Suppliers must provide a safe and healthy working environment by:

- Maintaining effective health and safety management systems.
- Identifying workplace hazards and implementing controls.
- Maintaining machinery and equipment safely.
- Providing suitable training and supervision.
- Supplying and enforcing the use of appropriate personal protective equipment (PPE).
- Ensuring safe handling of chemicals and hazardous substances.
- Providing clean welfare facilities and potable water.

- Maintaining emergency preparedness and incident response arrangements.

## **6. Environmental Responsibility**

Suppliers are expected to:

- Comply with environmental legislation and permit requirements.
- Manage waste responsibly.
- Reduce energy consumption.
- Reduce greenhouse gas emissions where practical.
- Minimise water consumption.
- Support responsible sourcing.
- Continually improve environmental performance.

Suppliers should support sustainable print and manufacturing supply chains wherever possible.

## **7. Ethical Business Conduct**

Suppliers must conduct business honestly, transparently and ethically.

### **7.1 Anti-Bribery and Corruption**

Suppliers must maintain a zero-tolerance approach to:

- Bribery.
- Corruption.
- Kickbacks.
- Improper payments.
- Facilitation payments.

Suppliers shall comply with the UK Bribery Act 2010 and all applicable anti-corruption laws.

### **7.2 Facilitation Payments**

Facilitation payments are strictly prohibited.

No supplier shall make unofficial payments intended to secure or accelerate routine business activities.

### **7.3 Conflicts of Interest**

Suppliers must disclose any actual or potential conflict of interest involving Bell & Bain.

### **7.4 Fair Competition**

Suppliers must:

- Comply with competition legislation.
- Avoid anti-competitive practices.
- Prohibit price-fixing, bid rigging and collusion.

## **8. Data Protection and Confidentiality**

Suppliers must:

- Protect confidential and commercially sensitive information.
- Comply with UK GDPR and applicable privacy legislation.
- Use information solely for legitimate business purposes.
- Promptly report relevant data breaches affecting Bell & Bain.

## **9. Modern Slavery and Human Trafficking**

Suppliers must maintain systems and controls to identify, prevent and address:

- Modern slavery.
- Forced labour.
- Human trafficking.
- Child labour.
- Exploitative labour practices.

Suppliers shall conduct due diligence within their own operations and supply chains and cooperate fully with Bell & Bain during ethical labour assessments and supplier reviews.

## **10. FSC® Requirements**

Suppliers providing forest-based materials or services affecting FSC-certified products must:

- Maintain valid FSC® Chain of Custody certification where required.

- Ensure material traceability.
- Prevent mixing or substitution of certified materials.
- Use accurate FSC claims.
- Comply with FSC trademark requirements.
- Maintain records for a minimum of five years.
- Cooperate with FSC audits and traceability checks.

Suppliers must not knowingly source materials linked to:

- Illegal logging.
- Human rights violations.
- High Conservation Value Forest destruction.
- Conversion of natural forests.
- Genetically modified trees.

## **11. Supply Chain Management and Due Diligence**

Suppliers shall:

- Apply the principles of this Code throughout their own supply chains.
- Monitor subcontractors and labour providers.
- Undertake due diligence regarding labour rights, environmental and ethical risks.
- Notify Bell & Bain of significant sourcing changes.
- Inform Bell & Bain immediately if serious breaches are identified.
- Maintain transparency regarding subcontracting arrangements and significant outsourced activities.

Suppliers must not use labour brokers or intermediaries to source underage, trafficked or otherwise vulnerable workers.

Bell & Bain may apply enhanced due diligence to suppliers operating in higher-risk sectors, geographic locations or activities where human rights, labour, environmental or ethical risks are considered elevated.

### **11.1 Awareness and Communication**

Suppliers are encouraged to communicate the requirements of this Code throughout their organisation and provide appropriate awareness and training relating to:

- Human rights.
- Labour standards.
- Modern slavery.
- Child labour.
- Ethical recruitment.
- Anti-bribery and corruption.
- Health and safety responsibilities.

Suppliers should ensure relevant employees, managers and subcontractors understand their obligations under this Code.

## **12. Remediation of Labour Rights Violations**

Where child labour, forced labour, prison labour or human trafficking is identified, suppliers shall:

### **Immediate Action**

- Cease the exploitation immediately.
- Protect affected individuals.
- Cooperate with relevant authorities where appropriate.
- Support immediate safeguarding actions.

### **Corrective Action**

- Develop and implement corrective action plans.
- Support the return of children to education where appropriate.
- Monitor the wellbeing of affected individuals.
- Provide alternative lawful livelihood arrangements where necessary.

### **Family and Community Support**

Where appropriate, suppliers should support:

- Family reunification.
- Engagement with welfare organisations.

- Community education initiatives.
- NGO and regulatory involvement.

Bell & Bain reserves the right to suspend orders or require additional controls until concerns have been satisfactorily resolved.

### **13. Reporting Concerns and Non-Retaliation**

Suppliers must promptly notify Bell & Bain of:

- Labour rights concerns.
- Human rights violations.
- Modern slavery risks.
- Bribery and corruption concerns.
- Conflicts of interest.
- Regulatory breaches.

No retaliation shall be taken against any worker, whistleblower, stakeholder or representative who reports concerns in good faith.

### **14. Monitoring, Audits and Continuous Improvement**

Bell & Bain may monitor compliance through:

- Supplier approval processes.
- Supplier questionnaires and self-assessments.
- Document reviews.
- Supplier meetings and reviews.
- Site visits where appropriate.
- Third-party audit reports.
- SMETA assessments.
- EcoVadis assessments.
- FSC verification activities.
- Corrective action reviews.

Bell & Bain may request:

- Policies and procedures.
- Certifications.
- Self-assessments.
- Audit reports.
- SMETA evidence.
- EcoVadis evidence.
- ISO certification evidence.
- FSC documentation.

Suppliers shall maintain records sufficient to demonstrate compliance with this Code and make relevant information available to Bell & Bain upon reasonable request.

Where non-conformances are identified, suppliers are expected to:

- Investigate root causes.
- Implement corrective actions.
- Prevent recurrence.
- Provide evidence of completion within agreed timescales.

Suppliers are expected to cooperate openly, address non-conformities and demonstrate continuous improvement.

### **15. Non-Compliance**

Failure to comply with this Code may result in:

- Corrective action requirements.
- Increased monitoring.
- Supplier review.
- Suspension of orders.
- Termination of supplier approval.
- Termination of the business relationship.

Bell & Bain will always seek corrective action and improvement before termination, except where serious, deliberate or repeated breaches are identified.

**Approved: Stephen Docherty**  
*Chairman*

**Date of Last Review and Revised: 21.04.2026**

**Date of Original Issue: 05.01.2022**

**Next Review Date: 29.01.2027**

### **Supplier Declaration**

I confirm that I am authorised to act on behalf of my organisation and acknowledge that we:

- Have read and understood this Supplier Code of Conduct.
- Will comply with its requirements.
- Will communicate these requirements throughout our organisation and supply chain.
- Will maintain records demonstrating compliance.
- Will cooperate with reasonable audits, assessments and due diligence activities.
- Will promptly address identified non-conformities.

**Supplier Name:** \_\_\_\_\_

**Representative:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

### **Appendix A**

#### **Compliance Monitoring, Measurement and Evaluation**

##### **Purpose**

Bell & Bain Ltd monitors compliance with this Supplier Code of Conduct to ensure suppliers, contractors, service providers and supply chain partners operate in a responsible, ethical, lawful and sustainable manner.

Monitoring activities support compliance with:

- SMETA Ethical Trade requirements.
- EcoVadis Sustainable Procurement requirements.
- FSC® Chain of Custody and Core Labour Requirements.
- Modern Slavery Act 2015.
- Human rights, labour, environmental and ethical business standards.

##### **Compliance Monitoring**

##### **Supplier Approval and Due Diligence**

Bell & Bain will monitor:

- Supplier onboarding activities.
- Supplier approval status.
- Due diligence reviews.
- Supplier declarations.
- Supplier risk assessments.
- Changes in supplier ownership, operations or locations.

Frequency: During onboarding and periodic supplier reviews.

##### **Human Rights and Labour Standards**

Bell & Bain will monitor:

- Compliance with labour standards.
- Modern slavery risks.
- Child labour controls.
- Forced labour and human trafficking risks.
- Freedom of association practices.
- Worker welfare concerns.
- Ethical recruitment practices.

Frequency: During supplier assessments and risk reviews.

### **Health and Safety**

Bell & Bain will monitor:

- Health and safety management arrangements.
- Accident and incident performance where relevant.
- Training and competency arrangements.
- Emergency preparedness arrangements.
- Corrective actions arising from audits or reviews.

Frequency: During supplier reviews and audit activities.

### **Environmental Performance**

Bell & Bain will monitor:

- Environmental certifications and controls.
- Waste management practices.
- Energy and resource management.
- Sustainable sourcing practices.
- Environmental incidents and non-conformances.
- Environmental improvement initiatives.

Frequency: During supplier approval and review processes.

### **Ethical Business Conduct**

Bell & Bain will monitor:

- Anti-bribery and corruption controls.
- Conflicts of interest disclosures.
- Business ethics concerns.
- Fraud or misconduct issues.
- Compliance with Bell & Bain ethical requirements.

Frequency: Ongoing and during supplier reviews.

### **FSC® Compliance**

Where applicable, Bell & Bain will monitor:

- FSC certification status.
- Material traceability.
- FSC claims and documentation.
- Chain of Custody requirements.
- FSC audit outcomes.

Frequency: During supplier reviews and FSC verification activities.

### **Performance Reviews and Audits**

Bell & Bain may monitor suppliers through:

- Supplier questionnaires.
- Self-assessments.
- Supplier review meetings.
- Document reviews.
- Site visits.
- Third-party audit reports.
- SMETA assessments.
- EcoVadis assessments.
- FSC verification activities.

Frequency: Risk-based and determined by supplier criticality and performance.

### **Key Performance Indicators (KPIs)**

Bell & Bain may monitor:

#### **Supplier Compliance**

- Number of approved suppliers.
- Number of supplier reviews completed.

- Number of supplier assessments completed.
- Number of supplier declarations received.

#### **Human Rights and Labour Standards**

- Number of labour-related concerns identified.
- Number of supplier modern slavery risks identified.
- Number of supplier non-conformances relating to labour standards.
- Number of corrective actions implemented.

#### **Ethical Business Conduct**

- Number of ethics-related concerns.
- Number of anti-bribery compliance issues identified.
- Number of conflict-of-interest disclosures received.

#### **Environmental Performance**

- Number of suppliers with environmental certifications.
- Number of environmentally preferred suppliers.
- Environmental non-conformances identified.
- Improvement actions completed.

#### **FSC Compliance**

- FSC supplier certification status.
- FSC traceability issues identified.
- FSC non-conformances raised.
- FSC corrective actions completed.

#### **Continuous Improvement**

- Number of supplier corrective actions raised.
- Corrective actions completed by target date.
- Repeat supplier non-conformances.
- Supplier improvement plans completed.

#### **Non-Conformance and Corrective Action Management**

Where supplier non-conformances or concerns are identified, Bell & Bain will:

- Record the issue.
- Investigate the concern.
- Assess risks and impacts.
- Identify root causes.
- Require corrective actions.
- Agree implementation timescales.
- Monitor actions to completion.
- Verify effectiveness before closure.

Serious, deliberate or repeated breaches may result in suspension of orders, removal from the approved supplier list or termination of the business relationship.

#### **Records**

Bell & Bain may maintain records including:

- Supplier approval records.
- Supplier declarations.
- Risk assessments.
- Supplier questionnaires.
- Audit reports.
- SMETA reports.
- EcoVadis assessments.
- FSC records.
- Supplier corrective action plans.
- Supplier review notes.
- Due diligence records.
- Management review records.

Records will be maintained in accordance with document control and data protection requirements.

### **Management Review**

Senior Management will periodically review:

- Supplier compliance performance.
- Human rights and labour risks.
- Modern slavery risks.
- Environmental performance.
- Ethical business conduct issues.
- FSC compliance performance.
- Audit findings.
- Corrective action effectiveness.
- Emerging supply chain risks.

Review findings will be used to strengthen Bell & Bain's sustainable procurement programme, supplier governance framework and responsible supply chain management activities.

**Approved: Stephen Docherty**

*Chairman*

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