



Benchmark®

## Supplier Code of Conduct

Benchmark is committed to conducting itself in an ethical manner and acting with integrity. Benchmark was founded with the vision of creating value for our customers, partners and investors, while safeguarding society and the world in which we work now and in the future. To achieve our vision we are committed to work with our suppliers towards a long-term sustainable future.

We therefore want to ensure that the parties we deal with, including our suppliers and representatives, live up to our values and standards and share in our duty to trade responsibly through requiring our suppliers to sign up to this code of conduct (“**The Supplier Code of Conduct**”).

Accordingly, suppliers and representatives should comply all local laws and the following principles as a minimum:

### 1. No bribery or corruption will be tolerated

Benchmark values its reputation for ethical behaviour and for financial probity and reliability. The Benchmark Anti-Bribery Policy prohibits the offering, giving, solicitation or acceptance of any bribe. We operate a zero-tolerance approach to bribery and corruption in any form: we do not offer, promise, give or receive bribes or any other form of inducement, regardless of value, for any purpose, whether directly or through a third party. We don't make facilitation payments, another form of bribery, nor allow third parties to do so on our behalf.

The definitions are simple:

- A bribe includes any payment, benefit or gift that's offered, promised, given or received with the purpose of improperly influencing an outcome or decision to gain a business advantage
- A payment may not necessarily be of a large value and may not be in the form of cash; it could be lavish hospitality

Any gifts or hospitality given or received are clearly for business purposes and are reasonable and appropriate, having regard to local culture and custom. Gifts of cash, stocks, bonds or lavish hospitality are never permitted.

Any exchange of gifts or hospitality has to comply with our [Anti-Bribery Policy](#), which requires that all corporate hospitality, entertainment and gifts given are processed through expenses, that higher value gifts and hospitality received are reported, and that approval is sought where the value of hospitality, entertainment or gift given or received is above a specified threshold.

Suppliers, representatives, and their employees must comply with all applicable anti-bribery and corruption laws. If no such anti-bribery or corruption laws apply or are of a lesser standard to that prescribed in the UK Bribery Act 2010, suppliers, representatives and their employees must adhere to the UK Bribery Act 2010.

Suppliers and representatives shall have in place anti-corruption and bribery procedures designed to prevent employees or persons associated with its business from committing offences of bribery or corruption. Suppliers and representatives will properly implement these procedures into their business and review them regularly to ensure they are operating effectively.

## **2. Modern Slavery, Forced Labour and Child Labour**

We do not tolerate slavery and take steps to ensure that modern slavery and human trafficking are not taking place in any part of our business or in our supply chains. Benchmark prohibits the use of forced or compulsory labour globally. No employee is made to work against their will or work as forced labour. We employ people under the age of 18 (apprentices, for example) in compliance with local laws and we will not employ children under the age of 16. Special care must be taken to ensure that young workers receive additional support and extensive health and safety training.

Benchmark's [Modern Slavery Policy](#) sets out Benchmark's approach to slavery in its many forms, and the actions it takes to mitigate the risk of slavery in its operations and supply chains. Suppliers and representatives are required to comply with the terms of Benchmark's Modern Slavery Policy.

## **3. Non-discrimination**

We aim to conduct our activities without discrimination and value everyone as an individual. Benchmark will not tolerate acts of harassment, bullying and discrimination (regardless of whether it is direct discrimination, discrimination by association, perception discrimination or indirect discrimination).

Discrimination in hiring, compensation, access to training, promotion, termination or retirement based on caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation must not be tolerated by our suppliers or representatives.

## **4. No harsh or inhumane treatment is allowed**

Suppliers and representatives shall provide a workplace free from corporal punishment, mental, physical, sexual or verbal abuse and must not use cruel or abusive disciplinary practices in the workplace.

## **5. Wages, benefits and working hours**

We expect our suppliers and representatives to pay a fair wage and provide employees with legally mandated benefits. Suppliers and representatives must also comply with the applicable laws on working hours and employment rights in the countries in which they operate.

## **6. Freedom of association and the right to collective bargaining is respected**

We require our suppliers and representatives to be respectful of peoples' rights of freedom of association and their right to join or form trade unions of their own choosing and to bargain collectively. Suppliers and representatives must ensure that employees are not discriminated against for this freedom.

## **7. Health and safety standards are upheld**

We expect our suppliers to be committed to a working environment where health, safety and wellbeing is paramount. A safe and hygienic working environment should be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards relevant to it.

Appropriate steps should be taken to prevent accidents and injury to health connected with work by minimising, so far as is possible, the hazards and associated risks inherent in a working environment, and

implementing emergency plans and response procedures. Workers should receive regular and recorded health and safety training to educate and protect workers from hazards. The supplier or representative implementing this code of conduct shall assign responsibility for health and safety to a senior management representative.

## **8. Environmental management**

Like any organisation we have an impact on our environment through the resources we use and the waste we produce. We also consider climate change and how we can reduce our greenhouse gas emissions and impact on global warming. We have an environmental programme in place to identify opportunities to reduce our impacts.

Every improvement makes a difference, so we require our suppliers and representatives to strive to manage their business activities in a way that, so far as is practical, conserves and protects natural resources and minimises the generation of waste through avoidance, reduction, reuse or recycling or enhancement in accordance with applicable environmental laws and regulations.

We have committed to achieving Net Zero carbon emissions by 2050. This ambition will require us to fully understand the carbon footprint of the products and services provided to us. Consequently, we will require our suppliers to work with us in pursuit of the target.

## **9. Animal welfare**

Benchmark is committed to achieving high standards of animal welfare. We employ animal welfare outcome measures across our operations, provide animal welfare training and seek to continuously improve animal welfare in our operations including through applying the principles of the three R's (reduce, refine, replace) to each test to ensure that our testing is as limited as possible. Our suppliers and representatives must respect and seek to improve animal welfare in their operations.

## **10. Confidentiality, insider trading and personal data**

The confidentiality of information exchanged in the course of business must be respected and used only for its intended and designated purpose, and never used for illegal purposes or individual gain. No confidential information in a supplier's or representative's possession shall be used to engage in or support insider trading. False information must not be given in the course of commercial negotiations. Any personal information about individuals shall be handled with full respect for the protection of their privacy and in compliance with all relevant privacy laws and regulations.

## **11. Quality**

Products and services shall be delivered to meet the specifications, quality and safety criteria specified in the relevant contractual arrangements and shall be safe for intended use. Research and development shall be conducted responsibly, based on good clinical practice and generally accepted scientific, technological and ethical principles.

## **12. Whistleblowing**

Employees of suppliers and representatives shall be provided through adequate means by which to raise concerns about any of these requirements, with protection from retaliation. If you have a serious concern that something may not be consistent with this Supplier Code of Conduct, please speak up. We encourage you to raise any concerns or questions you have in confidence, and we value the information that you can provide. Please direct any such communications to Benchmark at [compliance@bmkholdings.com](mailto:compliance@bmkholdings.com).

### **13. Audit**

Benchmark reserves the right to verify a supplier's or representatives' compliance with this code of conduct. Where such reviews or audits demonstrate shortcomings in any area, Benchmark reserves the right to require corrective actions. The Supplier Code of Conduct is intended to set out the way in which we and our suppliers will behave towards each other. It is not intended to be legally enforceable, to create any legal obligations or rights or to undermine our contracts with suppliers or the rules we set out when we procure our goods and services, which at all times shall take precedence.

### **14. Application to extended supply chain**

Our Supplier Code of Conduct sets out the commitments we expect our suppliers and representatives to meet. We expect our suppliers and representatives to communicate this Supplier Code of Conduct to their employees, parent company, subsidiaries. When you work with us, we also expect you to demand the same standards of your partners, subcontractors, consultants and suppliers.