

# Bespak Supplier Code of Conduct

## Who does this code apply to?

### 1. Us

- a. We expect all members of the Consort Medical Group, and all the Group's full-time and part-time employees and temporary staff at all our business locations to apply our code thoughtfully and consistently.

### 2. You

- a. We are also committed to working only with business partners whose standards are consistent with our own, and who respect our values. This includes joint venture and alliance partners, customers, sub-contractors, consultants and all suppliers of goods and services.

### 3. Your Supply Chain

- a. When you work with us, we expect you to demand these same standards of your partners, sub-contractors, consultants and suppliers. So our code applies to all of us, and complying with it is an expectation we have of everyone we work with.

## Ethical Conduct

1. Suppliers shall conduct their business at all times with the highest ethical standards
2. Suppliers who have their own written ethics and compliance standards should review these standards against the standards detailed in this code; advising Bespak of any inconsistencies which may create a conflict.
3. The Consort Medical Group has zero tolerance to modern slavery and human trafficking. Suppliers shall ensure that there is no modern slavery or human trafficking in their business.

## Compliance with Applicable Laws and Regulations

1. Suppliers are obligated, in all of their activities, to operate in full compliance with the laws, rules and regulations of the countries in which they operate including any applicable anti-bribery and anti-corruption laws and regulations.
2. Suppliers shall not directly or indirectly provide anything of value to a government official in order to:
  - a. Win or retain business
  - b. Gain an improper advantage
  - c. Illegally influence the action or decision of any individual customer or company, including their representatives.

## Accuracy of Business Records

1. Records must be legible, transparent, completed on a timely basis and reflect actual transactions and payments.
2. All financial records must conform to generally accepted accounting principles.

## Employment Practices

1. Suppliers must treat their employees and employees of Bespak with dignity and respect. There is zero tolerance to intimidation, hostility or any such behaviour that may be deemed as harassment or cause disruption to another's ability to work.

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2. Bespak does not tolerate retaliation against those who express concerns or in good faith report real or perceived violations of law, regulation or agreed standards of business conduct.
3. Suppliers must comply with all applicable employment laws and regulations.
4. Suppliers will comply with all applicable wage and hour laws and regulations and ensure that legally mandated benefits are provided.
5. Suppliers shall not produce, manufacture or procure goods or services using forced or indentured labour; specifically suppliers will not use child labour. Bespak does support legitimate workplace apprenticeship programmes which comply with applicable law and regulations.

### **Environment, Health & Safety**

1. Suppliers shall operate in a manner that is respectful and protective of the environment and, as a minimum, comply with all applicable laws and regulations regarding the environment and health and safety.
2. Suppliers working with Bespak or on Bespak site(s) must work in a way that assures their own health and safety and the safety of others in compliance with Bespak's policy and applicable legislation. Any incidents that may impact Bespak must be reported to Bespak Management promptly.
3. Suppliers shall not possess, use or sell illegal substances on Bespak property or undertake their work on a Bespak site whilst under the influence of alcohol or illegal drugs..

### **Gifts and Entertainment**

1. Gifts and entertainment are not needed in order to conduct business with Bespak and are strongly discouraged.
2. Suppliers shall not:
  - a. Give gifts, entertainment or preferred treatment with the intention of trying to influence the decision making objectivity of a Bespak employee.
  - b. Offer any gift, entertainment or preferred treatment while involved in a current purchasing or contracting decision process.
  - c. Offer any gift or currency, including gift cards, or extravagant recreational outings, travel or lodgings at supplier-sponsored events with the intention of trying to influence the decision making objectivity of a Bespak employee.
3. If you are in any doubt whether something is acceptable behaviour or not then please contact Bespak Management beforehand.

### **Expectations**

1. Bespak expects a consistently high level of performance from our suppliers in order to be able to support our operations and our customers as they expect.
2. Bespak will focus on the following main criteria:
  - a. Consistent quality of product/service
  - b. On-time, in-full delivery, without errors
  - c. Commercial competitiveness
  - d. Account management and aligned vision

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- e. Supply chain and product risk mitigation
- f. Innovation capabilities in product and process
- g. Sustainability of products and enterprise.

### Objectives

1. Our suppliers will endeavour to contribute to our performance in cost & cash management.
2. Our suppliers will support product innovation and sustainability improvements by collaborating with best-in-class suppliers in the market.
3. Our suppliers will work closely with us to improve operational and commercial performance.

### Intellectual Property and Confidential Information

1. All suppliers requiring the exchange of confidential information with Bespak are required to execute a Confidential Disclosure Agreement with Bespak in advance.
2. Suppliers shall not share with any third party without Bespak's prior written consent Bespak's intellectual property, confidential information or any other information that a supplier acquires with respect to Bespak business; including information related to Bespak's information which has been developed by suppliers whether such information relates to products, customers, pricing, costs, know-how, strategies, process and practices or otherwise.
3. Suppliers must immediately report suspected or actual unauthorised disclosure of Bespak confidential information, whether inadvertent or not, to Bespak Management and Legal Department in accordance with the section below entitled "Reporting breaches of this Code".

### Data Privacy

1. Suppliers must immediately report suspected or actual unauthorised use, disclosure or loss of Bespak related personal information to Bespak Management and Legal Department in accordance with the section below entitled "Reporting breaches of this Code".

### Conflict of Interest

1. A conflict of interest arises when personal interests or activities influence, or appear to influence, the ability to act in the best interest of Bespak. Situations which may cause a conflict of interest include:
  - a. Having a significant financial interest in any company that competes with, does business with or seeks to do business with Bespak.
  - b. When supplier family members or persons close to supplier employees (friends or indirect family members) work for Bespak, Bespak customers or Bespak competitor.
2. Suppliers must disclose any apparent or actual conflicts of interest to Bespak Management. If Bespak Management waives an apparent or actual conflict, this decision must be documented.

### Reporting breaches of this Code

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1. Any suspected or actual breaches of this Code shall be reported by Supplier as soon as Supplier becomes aware of such breach by notice in writing addressed to:
2. Head of Supply Chain, Bespak Europe Limited, Bergen Way, Kings Lynn, Norfolk, PE30 2JJ with a copy to: Group General Counsel, Bespak Europe Limited c/o Consort Medical plc, Breakspear Park, Breakspear Way, Hemel Hempstead, Herts HP2 4TZ.

We, *insert company name*, accept the terms detailed above

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for and on behalf of

Dated: