



BUNZL SOURCES PRODUCTS IN A CONSISTENT
AND ETHICAL MANNER AND WORKS WITH SUPPLIERS
TO IMPROVE SOCIAL AND ENVIRONMENTAL PERFORMANCE



Bunzl Ethical Sourcing Policy

Bunzl plc and its subsidiaries ('Bunzl' or 'the Group') • 15 June 2026

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supply chain that enables customers to
select products that meet their
commercial needs*

We treat suppliers as business partners and work with them to support delivery of our corporate responsibility commitments

Policy statement

Bunzl operates an extensive and flexible supply chain that enables customers to select products that meet their commercial needs. Our supply chain management processes are designed to ensure that products are manufactured and sourced responsibly. We seek to establish and maintain supplier relationships that are ethical, based on mutual benefit, and aligned with meeting customer requirements.

We treat suppliers as business partners and work with them to support delivery of our corporate responsibility (CR) commitments in relation to products and services. We work with key product suppliers to ensure that defined CR standards are maintained.

This policy sets out how Bunzl sources products in a consistent and ethical manner and how we work with suppliers to improve social and environmental performance. The policy covers the following elements:

Risk assessment

We periodically conduct a risk assessment of our global supplier base to identify social risks, including modern slavery and bribery. This assessment informs how we prioritise resources and actions based on risk exposure.

We carry out regular adverse media screening to identify emerging modern slavery risks in key sectors and countries where Bunzl operates, as well as potential links to our key suppliers.

We aim to improve our understanding of the social and environmental impacts of our supply chain. To achieve this, we will actively work with our supply chain to collect information on the impact of the materials used and the origin of the materials.

Supplier standards

The Supplier Code of Conduct establishes our expectations for suppliers in the areas of labour and human rights, environment, health and safety, ethics and management systems. The Code applies to the selection and retention of all suppliers that provide products and services to Bunzl worldwide. By trading with Bunzl, we expect suppliers to accept and apply our standards. This also applies to subcontractors.

The key elements of the Supplier Code of Conduct are as follows:

- Compliance with internationally recognised minimum requirements for workers' welfare and conditions of employment as defined by the International Labour Organisation or the Ethical Trading Initiative, which specifically prohibit child labour, forced labour (including slavery and human trafficking), unfair wages and working hours, discrimination and denying freedom of association.
- Compliance with applicable laws and regulations relating to fraud, anti bribery and corruption, competition, and antitrust. Suppliers are expected to act honestly, follow fair competition principles, and maintain appropriate controls.

Where contractual agreements exist with suppliers, it is expected that they will contain clauses that require the relevant supplier to comply with our Supplier code of conduct.

Suppliers that are based in countries with elevated risks of modern slavery and bribery will be expected to confirm compliance with the Supplier code of conduct by completing and returning to Bunzl a statement of conformity.

Supplier evaluation and auditing

We take a risk-based approach towards supplier auditing. We selectively audit supplier performance in the areas of human rights, corruption, legal compliance and quality standards. Suppliers that, based on risk assessment, are categorised as 'high-risk' will be assessed and/or audited on social risks at the facilities used for the manufacture of Bunzl products.

Suppliers who are unable to meet all the requirements after an initial assessment/audit will be given the opportunity to comply fully within a period which is deemed appropriate for the circumstances. If a serious breach is identified, an action plan should be documented and the supplier will be expected to commit to addressing all the areas where discrepancies have been identified. The process

of improvement is principally down to the commitment of the supplier's management team/owner/agent to ensure that all areas are addressed. If we have reason to believe that the supplier is not making sufficient or committed progress, then this will lead to a suspension in the relationship until such time that we are confident that all areas were being satisfactorily addressed.

Bunzl companies reserve the right to cease a relationship with a supplier if it is found that unacceptable practices are being employed at any sites used for producing or sourcing Bunzl

products. Such practices include but are not limited to the use of child labour, forced or bonded labour, physical abuse or discipline and intimidation as well as non-compliance with anti-bribery legislation.

Partnerships with suppliers

Where appropriate, we aim to work with our suppliers to improve work practices in our value chain, for example through knowledge transfer and continued education and training about environmental and social standards.

Staff training

All of our senior procurement staff are required to complete the CR training on bribery, modern slavery and other social risks. The training helps these employees to understand and recognise risk issues that might occur in our supply chain and informs them of the appropriate actions that should be taken if such issues are found.

We will use the risk assessment to improve transparency of our supply chain

Application of the policy

Our Ethical Sourcing Policy Guidelines describe how this policy is implemented in practice. The guidelines set out the country and supplier risk classification methodology, supplier assessment processes, communication requirements, and application of the Supplier Code of Conduct. The guidelines focus on suppliers of goods for resale. Requirements for suppliers of services (particularly agents) are addressed separately within the Anti Bribery and Corruption Policy and supporting documents. Businesses may, where appropriate and based on local business needs and risk considerations, apply the principles and requirements of this policy and the guidelines to suppliers of goods not intended for resale.

Regular risk assessment

The Supply Chain Subcommittee (SCSC) of the Sustainability Committee periodically completes a supply chain risk assessment to establish social risks, including modern slavery, in our supply chain. The risk assessment will also include bribery risks. The risk assessment will be used to maintain a list of countries and, if applicable, industry sectors with the applicable risk categories (ranging from low to very high risk). The SCSC will communicate the list and any changes to it to Bunzl businesses.

We will use the risk assessment to improve transparency of our supply chain and will request selected suppliers in at risk supply chains to provide information on the manufacturing process and the origin of the materials used for the manufacture of the products supplied to us.

Communication of supplier standards

Global Supply Chain Solutions (GSCS, our Global Sourcing and QA/QC function based in Shanghai), is responsible for sending the Supplier Code of Conduct to all high-risk suppliers. Bunzl businesses are responsible for sending the Supplier Code of Conduct to low-risk suppliers. The process and frequency of communication are determined by the SCSC and any changes are communicated to the businesses by GSCS. Where contractual agreements exist with suppliers, it is expected that they will contain clauses that require the relevant supplier to comply with our Supplier Code of Conduct.

Supplier evaluation and auditing

GSCS is responsible for implementing and maintaining a supplier audit and assessment programme for all high-risk suppliers. The audit process will be reviewed periodically to ensure these reflect changes in regulations, industry standards, supplier base and Bunzl's ethical sourcing requirements.

GSCS will make Bunzl businesses aware of any serious breach identified in supplier audits. GSCS and the local Bunzl business will jointly ensure enforcement of appropriate corrective actions by the supplier involved. If the corrective actions have not been implemented within the timeframe set by GSCS, the business will cease trading with the relevant supplier. GSCS will maintain and communicate a list of delisted suppliers.

Businesses report every quarter to GSCS their new and existing suppliers in Asian and high-risk countries, which will include details of product spend, country and product sector.

Trading with suppliers in very high-risk countries is not allowed without specific approval by GSCS.

New suppliers

Bunzl businesses that plan to trade with a new supplier should ensure that a new supplier receives a Supplier Code of Conduct in accordance with the process determined by the SCSC. For new suppliers in a high-risk country, Bunzl businesses will notify GSCS. After receiving the notification, GSCS will start the Supplier Code of Conduct process and evaluate the supplier for inclusion in the supplier audit programme.

Training

All businesses should ensure that all senior staff, including managers and procurement and sales executives, complete the CR training modules on business ethics and modern slavery with a minimum frequency of at least once every three years. Completion of the training will be recorded and reported to Group HR annually.

Reporting

GSCS will report periodically to business area management a summary of the critical social risk issues that have been identified during the audits.

Targets

To support effective implementation of this policy and its related measures, we have set the following targets:

- At least 90% of spending on products sourced from high-risk regions will be sourced from suppliers that have been assessed and found compliant, alongside ongoing efforts to deepen supplier evaluations and strengthen our risk-based approach.
- By 2027, at least 80% of suppliers (by emissions) will have established science-based emissions reduction targets (see also our Environmental Policy)

Policy ownership and monitoring

The Ethical Sourcing Policy is owned by the Director of Group HR. The Policy and the Supplier Code of Conduct and other associated documents are subject to review and revision on an ongoing basis. A formal review of the policy and the Supplier Code of Conduct will be carried out at a minimum once every three years by the SCSC. The compliance with the requirements of the policy is monitored by SCSC.

This includes an annual review of:

- Compliance with the requirement to communicate the Supplier Code of Conduct to suppliers
- The effectiveness of the supplier evaluation and auditing procedures

The Chair or other representative of the SCSC provides a quarterly update to the Bunzl Sustainability Committee on the status of the ethical sourcing programme, procedures and performance.

The Director of Group HR provides twice a year an update to the Board of Bunzl plc on the status of the critical issues identified in supplier audits undertaken and overseen by GSCS.