



The Bunzl Code of Conduct defines the principles and standards that we expect our employees to adhere to

## **Bunzl** Code of conduct Policy

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

*We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards*

# **Equal attention must be given to Bunzl's global and local policies and procedures as well as to the various laws and regulations that apply to our work**

## **Policy statement**

**We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards. Employees should be guided by adherence to applicable laws and regulations while at the same time apply common sense and logic and adopt the basic standards of behaviour expected in society.**

The Bunzl Code of Conduct ('Code') defines the principles and standards that we expect our employees to understand and adhere to. All employees are expected to read the Code carefully and

think about the ways in which it applies to them and the work they perform for Bunzl.

Equal attention must be given to Bunzl's global and local policies and procedures as well as to the various laws and regulations that apply to our work. Every employee is responsible for making

themselves aware of the policies and procedures that apply to them and to raise any questions or concerns with local management. It is never acceptable to deviate from the Code or any of these policies and procedures to achieve a business objective.

## **Application of the policy**

The responsibility for communication of the Code is directed by the Group HR function through the business areas.

Businesses should ensure that all employees are aware of the Code by providing them with a copy of the Code in their local language with their employment contract or within the employee handbook.

Businesses should ensure that all staff complete the corporate responsibility training modules on the code of conduct as soon as practically possible, ideally within one month, after joining the company. All standard modules should be completed every three

years. All advanced modules should be completed every two years. Records of completion of training should be maintained.

## **Policy ownership and monitoring**

This policy and the Code are owned by the Director of Group HR and are subject to review and revision on an ongoing basis. A formal review of the policy and the Code will be carried out at a minimum every three years by the Sustainability Committee.

Completion of the Skill Pill training will be monitored annually by the Group HR function.