



CODE OF CONDUCT POLICY

Bunzl plc and its subsidiaries ('Bunzl' or 'the Group')

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 at least once every three years and maintain records of completion of such training.

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 Corporate Responsibility Committee (CRC).

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

21 August 2019