

Buzz Group Limited Supplier Code of Conduct - Procurement & Corporate Responsibility

Code of Conduct

Buzz Group Limited (the “**Company**”) is increasingly aware and concerned about the potential environmental and social cost that may occur as a result of organisations in our supply chain behaving in an unethical manner. We are also rightly concerned about the reputational damage that may occur to the Company, our customers and partners. We have therefore developed a code of conduct for procurement & corporate responsibility (the “**Code**”). The code sets out our commitment to doing the right thing within the supply chain and acting with integrity. We expect our business partners and suppliers (“**Suppliers**”) to adhere to the principles of the Code wherever they operate around the world. We will engage with our Suppliers to manage the social and environmental impacts of the products and services we procure, paying attention to what we use and the origin of what we use is critical to reducing our environmental impact. We will ensure that the goods and services we purchase are considered for their environmental impact. Suppliers will share our commitment to doing the right thing and acting with integrity and will operate in a way that is consistent with the Code. As an ethical operator the Company believes in the fair treatment of its workforce and we aim to source our products and services from Suppliers that also employ fair working practices and utilise ethical policies and practices throughout their own procurement and production. The Company is acutely aware of our impact upon the environment, and our environmental stewardship approach is based on reducing carbon dioxide emissions and understanding and then reducing the impact on the environment of the resources we use. We aim to achieve this through ethical and sustainable procurement, efficient operating and responsible waste strategies, and we aim to reduce our impact on the environment on a year on year basis. We require that our Suppliers join us in our efforts to reduce our environmental footprint. We will increasingly focus on the environmental behaviour of our supply chain and demand greater environmental responsibility, transparency and efforts in ensuring sustainability.

The Supplier confirms that it has a set of business principles consistent with the Code, that it applies across its company including subsidiaries and any third parties it uses to provide goods and services to the Company which establishes the minimum standards to which the Supplier will operate. Such business principles include a commitment to operate with professionalism and integrity and to manage the social and environmental impact of the Suppliers business.

Operating Safely and Securely

The Supplier confirms that it has a robust health and safety management system in place covering matters that include but are not limited to:

- Policy;
- Board level accountability;
- Risk identification and mitigation;
- Competency & training;
- Measuring and reporting; and
- Periodic performance review.

Conducting Business with Integrity

The Supplier confirms that:

- It has and will comply with all relevant and applicable anti-bribery and corruption legislation;
- It has in place anti-bribery and corruption policies and procedures that apply across its business and subsidiaries;

- The policy prohibits bribes of any form as described above, including kickback payments and facilitation payments;
- It has not and will not use gifts or donations to influence a decision or create an improper advantage;
- It will not, in its relationship with the Company (including its employees and contractors), offer gifts, hospitality or donations or seek to obtain an improper business advantage with gifts, hospitality or donations; and
- It is compliant with other legal and regulatory rules and standards, specifically in relation to fraud, and will not tolerate or accept any such behaviour from its suppliers.

The Supplier also confirms that it will compete fairly, and this includes:

- Not using or passing insider information for their own or another's benefit;
- Dealing with consumers and business partners in a fair, ethical and transparent way and not engage in anti-competitive activity;
- Extending, where possible, positive social and environmental impacts beyond its own operations; and
- Being fair, ethical and transparent in its communications and dealings with its own business partners and other stakeholders affected by its supply chain activities including taking reasonable steps to ensure that it fulfils the payment terms and other conditions agreed with its business partners.

Valuing People & Human Rights

The Supplier confirms that (unless otherwise required or prohibited by law):

- It will recruit people on the basis of the qualifications and individual capabilities needed to do the job;
- It will embrace diversity and not operate any form of discrimination, harassment or bullying in the workplace;
- It will offer fair rewards and recognitions;
- It does not discriminate against any employees on any grounds (including, but not limited to, age, race, religion, disability or gender);
- It does not engage in or support the use of corporate punishment, mental, physical, sexual or verbal abuse and does not use cruel or abusive disciplinary procedures in the workplace;
- It pays each employee at least the minimum wage, or a fair representation of the prevailing industry wage, (whichever is the higher) which allows the employee to sustain the essentials for quality life;
- It provides each employee with all legally mandated benefits;
- It complies with the laws on working hours and employment rights in the countries in which it operates;
- It is respectful of its employees' rights to join and form independent trade unions and freedom of association;
- It has taken all appropriate steps to ensure there are no Modern Slavery Practices in its supply chain;
- It has taken all appropriate steps to ensure that its workplaces are free of sexual harassment, harassment related to sex, or harassment of any nature and shall adhere to The Worker Protection (Amendment of Equality Act 2010) Act 2023;
- that its current employees, officers, or representatives, in its relationship with the Company (including its employees and contractors), do not engage in any form of sexual harassment, harassment related to sex or harassment of any nature towards the Company and third-party employees, officers, or representatives in the course of their employment;
- It provides a safe and healthy workplace, presenting no immediate hazards to its employees;
- Any housing provided by the Supplier for its employees is safe and fit for habitation; and
- It provides access to clean water, food & emergency healthcare to its employees in the event of accidents or incidents in the Suppliers workplace.

Valuing the Community

The Supplier confirms that it manages its social and economic impact on local stakeholders and communities. Where the Suppliers activities may have a negative impact on local stakeholders and communities, the Supplier confirms that:

- It has a policy to outline how it manages its social and economic impact on local stakeholders and communities; and
- Such policy outlines:
 - When the Supplier will conduct impact assessments;
 - Who the Supplier will allow to participate in impact assessments; and
 - Where, when and how the impact assessments will be made available.

Valuing the Environment

The Supplier confirms that it understands, manages and reduces its own environmental impact and where possible, will help the Company to meet its environmental goals. With this in mind, the Supplier confirms that that it has a robust environmental management process in place including but not limited to:

- Policy which includes a commitment to reduce its impact on the environment including:
 - CO2 and energy management with reduction targets; and
 - Waste management and recycling;
- Board level accountability;
- Impact and risk identification and mitigation;
- Competency & training;
- Measuring and reporting; and
- Periodic performance review.

We will monitor performance and take appropriate action where we believe Suppliers do not act consistently with our standards. The Supplier confirms that it will be responsive to any concerns raised by the Company about the Suppliers own supply chain raised by stakeholders or by business partners through the Company's procurement and supplier management processes. The Company reserves the right to, either before or after we begin to work with a Supplier, to appoint our nominated ethical supply chain auditor to conduct an analysis of the policies, procedures and processes in place at the Supplier. If there are significant deviations to our Code and standards then we will not engage with that Supplier.