

Acal BFi Group Supplier Code of Conduct

March 2022

1.1 Purpose

This Code of Conduct defines the basic requirements placed on suppliers of goods and services to the Acal BFi group ('Acal BFi') companies, in particular their responsibilities towards their stakeholders and the environment. The principles expressed in this Supplier Code of Conduct comprise an important component of supplier selection and evaluation, as well as reflecting the environmental, social and governance principles that Acal BFi incorporates in all aspects of its business.

Acal BFi reserves the right to reasonably change the requirements of this Code of Conduct. In such an event, Acal BFi expects the supplier to accept such reasonable changes. The Acal BFi Board of Directors has ultimate responsibility for the implementation of this Code of Conduct.

1.2 Scope

This code of conduct applies to all suppliers currently supplying goods and services to any Acal BFi Group business.

1.3 Carbon Emissions

Suppliers should be committed to helping the Group meet its environmental commitments. Suppliers should be seeking to reduce negative environmental impacts including the prevention of pollution. We expect our suppliers to encourage the use of environmentally friendly technologies and practices and the reduction of negative environmental impacts throughout their supply chain.

Suppliers are encouraged to implement an environmental management system and we would value suppliers who are working towards or have a certified management system, such as, or similar to ISO14001 (UKAS Accredited).

1.4 Ethical Requirements

To meet social responsibilities, suppliers shall conduct their business in an ethical manner and act with integrity. Ethical requirements include the following aspects:

1.4.1 Business Integrity:

Suppliers shall not practice or tolerate any form of corruption, extortion, embezzlement, or money laundering. Suppliers shall not offer or accept bribes or other unlawful incentives (e.g. facilitation payments) to or from their business partners or government officials.

Suppliers shall not offer to Acal BFi employees any kind of gifts or personal benefit which could be perceived as a bribe. In all cases, gifts or entertainment shall not be offered to improperly influence a business relationship and must not violate applicable laws or ethical standards.

1.4.2 Conflicts of Interest:

Suppliers shall disclose to the business any situation that could constitute a conflict of interest, such as Acal BFi employees having professional, private and/or significant financial advantages or interests in any of the supplier's businesses.

1.4.3 Fair Competition:

Suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

1.4.4 Conflict Minerals:

Suppliers shall ensure that products supplied to Acal BFi do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups and cause or foster human rights abuses.

1.5 People and labour

Suppliers shall protect the human rights of their employees and treat them with dignity and respect. This includes the following aspects:

1.5.1 Child labour:

We do not tolerate child labour in our supply chain. Suppliers must avoid any sort of child labour in their business operations consistent with the International Labour Organization's (ILO) core labour standards and the United Nations Global Compact principles.

1.5.2 Freely chosen employment:

We do not tolerate slavery, servitude and forced or compulsory labour and human trafficking in our supply chain. Bonded, indentured or involuntary prison labour also is not accepted.

1.5.3 Working time, wages, and benefits:

Suppliers should commit to the elimination of excessive working hours. Working time for suppliers' employees shall not exceed the maximum set by the applicable national law and by ILO standards. Compensation shall be paid to employees regularly, in a timely manner and in full, according to applicable laws, and must comply with applicable national wage laws. Compensation and benefits should aim at providing a minimum living wage to ensure an adequate standard of living for employees and their families. Unless otherwise provided by local laws, deductions from basic wages as a disciplinary measure

shall not be permitted. Suppliers are expected to provide their employees with fair and competitive compensation and benefits and to support equal pay for work of equal value.

1.5.4 Fair treatment:

Suppliers must provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, physical punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment.

1.5.5 Inclusion and Diversity:

Equal treatment of all employees and a commitment to non-discrimination must be a fundamental principle of the supplier's corporate policy. Typical discriminatory treatment takes into consideration – consciously or unconsciously – characteristics of an employee such as age, disability, ethnicity, family status, gender, gender expression, gender identity, genetic information, national origin, physical characteristics, political affiliation, pregnancy, religion, social origin, sexual orientation, union membership or any unlawful criterion under applicable law.

1.5.6 Freedom of association and collective bargaining:

Suppliers shall recognise and respect the rights of employees to freely associate, organise and bargain collectively, if they so wish to. In situations where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations, Acal BFi expects suppliers to allow alternate forms of worker representations.

1.6 Health, safety, and environment

Suppliers shall make adequate provision for the health and safety of their employees, customers, visitors, contractors, and others who may be affected by their activities. They shall operate in an environmentally responsible and resource efficient manner. This comprises the following aspects:

1.6.1 Occupational health and safety:

Suppliers shall adequately protect their employees against chemical, biological and physical hazards. Physically demanding tasks and conditions in the workplace, as well as risks associated with infrastructures used, must be adequately managed to protect their employees. Suppliers shall provide appropriate safe work procedures, technical protective measures and adequate maintenance to mitigate health and safety risks in the workplace and to prevent accidents and occupational illnesses. In addition, suppliers shall provide employees with appropriate personal protective equipment.

Safety information relating to any identified workplace risk or hazardous materials – including compounds in intermediate materials – shall be available to educate, train and protect workers from hazards. A safe and healthy working environment shall include as a minimum the provision of potable drinking water, adequate lighting, temperature, ventilation, sanitation and, if applicable, safe and healthy company living quarters.

1.6.2 Product safety:

Suppliers must comply with product safety regulations, label products properly and communicate product-handling requirements. They shall provide to relevant parties the applicable documentation containing all necessary safety-relevant information for all hazardous substances in case of a legitimate need.

1.6.3 Waste and emissions:

Suppliers shall ensure the safe and compliant handling, storage, transportation, disposal, recycling, reuse and management of waste, air emissions and wastewater discharges. Any activity that has the potential to adversely impact human or environmental health shall be appropriately managed, measured and controlled. The release of hazardous substances shall be minimised. Suppliers shall prevent or mitigate accidental spills and fugitive emissions of hazardous materials.

1.6.4 Natural resource conservation:

Suppliers shall use natural resources (e.g. water, sources of energy, raw materials) in an economical way and preserve them. Negative impacts on the environment and climate caused by the suppliers or in their supply chain shall be minimised or eliminated at their source.

1.7 Quality

Suppliers shall meet generally recognized quality standards or contractually agreed quality requirements and standards. Suppliers shall immediately address all critical issues that have the potential to negatively affect the quality of goods and services.

Suppliers must inform Acal BFi about changes to the manufacturing or supply process that have the potential to impact the specification of goods and services provided.

1.8 Governance

Suppliers shall implement effective management systems and a governance structure to facilitate compliance with all applicable laws with respect to the expectations set forth in this Supplier Code of Conduct. This includes the following aspects:

1.8.1 Legal requirements:

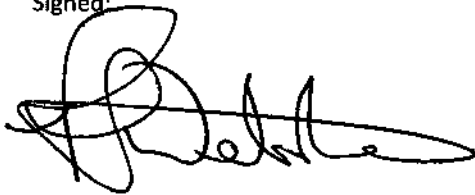
Suppliers shall identify and comply with all applicable international, national and local laws and regulations, contractual agreements and internationally recognised standards. Suppliers shall also conform their practices to generally accepted industry standards, and shall obtain, maintain and keep up-to-date all applicable permits, certificates, licenses and registrations.

1.8.2 Right to evaluation:

Suppliers shall grant Acal BFi the right to evaluate their performance, upon reasonable prior notice, to determine supplier's conformance with the principles outlined in this Supplier Code of Conduct.

Suppliers shall maintain documentation necessary to demonstrate conformance with the principles outlined in this Code of Conduct

Signed:

A handwritten signature in black ink, appearing to read 'Paul Webster', written over a horizontal line.

Paul Webster

Group Chief Executive Officer, Acal BFi

Date: 30th March 2022