



JBS Supplier Code of Conduct Policy (Responsible Sourcing Policy)

To be agreed & signed by each JBS Supplier / Business Partner

Sustainable Procurement Policy

JBS Group strives to 'do the right thing' for our clients, our people and communities. For JBS to have a positive and sustainable impact, we need our Suppliers' consistent and full support. The below guidelines are consistent with JBS values of 'sustainability'. We require our Suppliers to adhere closely and sign up to these Code of Conduct guidelines.

Procurement

Guiding Principles

These are the guiding principles governing JBS employees' relationships with our Business Partners (suppliers, contractors, service providers and consultants). These principles are detailed in the JBS Group Code of Business Ethics for Employees. They include:

1. Integrity
2. Confidentiality of information
3. Legality
4. Disclosure of Interest
5. Loyalty
6. Fairness
7. Consideration for workplace / external environment

These principles apply equally to JBS Business Partners. The purpose of this document is to inform our Business Partners (Suppliers) of our expectations of in relation to conducting business or seeking to conduct business with JBS.

Basis of purchasing decisions

JBS Purchasing decisions and contract awards are made **solely** on the basis of the **best commercial offer** submitted, in accordance with the award criteria (such as sustainability) for the particular request for quotation. At all times any impropriety, or even the perception of any impropriety, must be avoided and reported.

Responsibilities of our Business Partners

JBS Business Partners are required to comply with this **Supplier Code of Conduct**. They must ensure that all of *their* employees who come in contact with JBS Group are made aware of, and comply with, this Code of Conduct. The **Statement of Commitment** (see Appendix 1 at the end) must be signed off by all Business Partners who conduct, or wish to conduct, business with JBS Group companies.

The JBS Supplier Code of Conduct covers 4 main areas:

- 1) Business Ethics,***
- 2) Labour & Human rights***
- 3) Environment***
- 4) Community Development***

Main Requirements:

1) Business Ethics:

a. Anti Bribery & Corruption

Bribes, Kickbacks and Commissions

- These are PROHIBITED.
- They may not be given, received, offered or solicited; whether directly or indirectly through a third party. Any offer must be promptly reported to JBS management.

b. Gifts

- Gifts are not necessary, desired, nor are they expected.
- Where gifts are given, they must be notified to the JBS Group Managing Director. They should be infrequent and of nominal value. Any gift must not exceed £100/€120, and in any case **must only** be given to the MD (who then redistributes this to JBS staff at random/by way of raffle etc).
- In the event of gifts of high value (e.g. Christmas Hampers) being received by employees, it is company policy that the employee advises the MD, who should return the gift to the supplier.
- JBS employees are expressly prohibited (Gross Misconduct) from soliciting or receiving gifts or personal favours from Business Partners; any such requests must be advised to JBS Group Managing Director (see 4g below) within 48 hours.

c. Hospitality

- Hospitality should be modest and appropriate to the business situation.
- The provision of overnight accommodation, overseas travel, motor vehicles or use of motor vehicles is PROHIBITED.
- Meals may be provided in the context of business only, such as when an employee is on a visit to a business partner's premises, but they should not be lavish or overly expensive.
- In situations where Business Partners visit JBS on a regular basis, the JBS employee is expected pay for lunch every second time, having obtained prior clearance from their Manager.
- The provision of 'parties' with 'free bar' or similar is PROHIBITED.
- JBS employees are obliged to report all offers of hospitality to their supervisor within 48 hours.

d. Conflict of Interest

- JBS employees and Business Partners must avoid any situation that is, ***or may be perceived as***, a Conflict of Interest.

- JBS employees must represent JBS Group's best interests and both the employee and the Business Partner are required to disclose the following:
 - Any close relationship that could affect the business relationship or a business decision.
 - Any common business interests.
 - Close family/personal ties with persons who can influence the business decision.

- e. Use of JBS Group name or logo (or any JBS-owned logos or name and logos of companies owned by JBS Group)**
 1. Business Partners may *not* use the names or logos of JBS Group, without prior, specific, written permission of the Chairman.
 2. This is dealt with in detail in our Conditions of Contract.

- f. Attempt to canvass or influence a Purchase Decision**
 1. Any improper attempt to influence a Purchasing Decision or to canvass can, and will, lead to exclusion from the JBS Procurement Process and other actions.

- g. Confidentiality and Reporting**
 1. Business Partners are required to report concerns regarding Ethical issues or violations of this Code of Conduct by an employee of JBS Group, by their employees, or by a third party within 48 hours, to:-
 - JBS Group Chair, Grattan.Boylan@Jbs.group
 2. Confidentiality will be assured, but anonymous claims will also be investigated. Whistle-blowers will be protected (in line with JBS Whistle-blower Policy).
 3. Business partners must comply with applicable privacy and data protection laws, including GDPR; as well as secure JBS confidential/personal data and prohibit its unauthorized access.

- h. Consequences**
 1. JBS Group will pursue substantiated contraventions of this Code of Conduct as far as permissible under UK/EU legislation.

- i. Contracts / Purchase Orders**
 1. It is JBS Group's policy and practice to issue a Purchase Order prior to supply of materials or services or the commitment of resource by a Supplier.
 2. In addition, for major contracts, a formal contract must be executed by the parties prior to commencement.
 3. Invoices will not be processed without a valid purchase order.
 4. Accurate records (timesheets, delivery notes, GRNs etc.) must be kept and produced on request – falsification of records is PROHIBITED and may be prosecuted.
 5. JBS Group pays only on verified receipt of goods, works or services. (GRN)
 6. All products supplied to JBS Group must comply with the relevant BS/EN certification at least and any certification specified by JBS Group on the P.O. Where Counterfeit, Fraudulent or Suspected Items (CFSI) are supplied, JBS retains the right to withhold payment and to report the issue to our customers and to the British Safety Industry Federation and 3rd parties to seek publication, future production prevention and damages arising.

For the avoidance of doubt, products marked with the China Export (CE logo) but without the appropriate and current European Norms (CE certification) are identified as counterfeit.

Re CFSI: JBS operates a “one-strike-and-you-are-out-&-reported” policy. This is to prevent counterfeit products getting into our supply chain.

j. Drugs and Alcohol Policy

1. Suppliers and business partners are bound by **JBS Group Drugs and Alcohol Policy**.
2. The policy seeks to prevent accidents or damage to property, arising through oversights and errors of judgement as a result of the consumption of alcohol or drugs by staff, or Business Partners.
3. Working on JBS Group property under the influence of alcohol or drugs is strictly prohibited.
4. Suppliers and service providers must ensure that all of their staff who work on JBS Group sites are familiar with this policy on drugs and alcohol and have systems in place to ensure that their employees abide by the policy.
5. Random testing of staff, suppliers, contractors and service providers may be undertaken. Action may be taken against any staff member or supplier found to be in breach.

2. Labour Practices (Based on Ethical Trading Initiative, 9 Point Base Code)

1) Employment must be Freely Chosen.

- 1.1 Forced, bonded or compulsory labour must not be used.
- 1.2 Employees must be free to leave employment at any time after reasonable notice.
- 1.3 Employees must not be required to lodge identity papers nor other valuable items with their employer.
- 1.4 Employees are free to leave their employer after reasonable notice.
- 1.5

2) Freedom of Association & Right to Collective Bargaining

- 2.1 In line with local laws, employers must recognise the rights of employees to choose whether or not to be represented by a trade union and to organise and engage in union activities.
- 2.2 Where workers' representation and collective bargaining are restricted by law, employers must facilitate open communication and direct engagement between workers and management.
- 2.3 The employer must ensure that worker's rights, needs and views can be considered and acted upon.

3) Child Labour Avoidance

- 3.1 No person shall be employed who is under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is the greatest.
- 3.2 Young people under the age of 18 shall not be employed.
- 3.3 No young staff will be employed in hazardous conditions or work that could affect their personal development. (Eg No night time shifts etc).

4) Working Hours

- 4.1 Working hours should not exceed the standards set in local law and should not be excessive.
- 4.2 Workers should get initial and regular, recorded Health & Safety Training. Health & Safety will be the responsibility of a senior manager.

4.3 The employer will ensure access to potable water, clean toilet facilities and suitable food storage facilities.

4.4 Workers should be allowed at least one day off per seven-day week.

5) Wages and Benefits

5.1 Employees' employment conditions should be clearly communicated to them.

5.2 Employees should be fairly and reasonably paid in line with applicable wage laws relating to minimum wages, overtime hours and legally mandated benefits.

5.3 Workers should be paid in a timely manner, documented via pay slips or similar.

6) Non-Discrimination

6.1 There shall be no discrimination in hiring and employment practices such as promotions, rewards or access to training.

6.2 Employees should not be discriminated against on the basis of race, caste, national origin, religion, age, gender, marital status, sexual orientation, union membership or political affiliation.

7) Humane Treatment

7.1 There shall be no harsh or inhumane treatment of workers such as verbal or physical abuse.

7.2 Disciplinary procedures should be clearly defined and communicated to workers. All disciplinary measures shall be recorded.

7.3 Employers will outline a clear and **fair grievance procedure** that facilitate and protects those staff members who raise legitimate issues and suggested improvements.

8) Human Trafficking

8.1 Employers will take a proactive approach to eliminating human trafficking. As such any staff employed even temporarily must show their passport and or work permit. 8.2 Any suspected case of human trafficking must be reported to the appropriate authorities, in line with the current legislation.

9) Health and Safety

a) Occupational Safety

Workers should be provided with safe and hygienic working conditions. Appropriate steps shall be taken to prevent accidents and injury to health through control of hazards in the workplace. Where hazards cannot be controlled, then appropriate, well maintained personal protective equipment shall be provided. Workers shall receive regular, recorded health and safety training. Workers shall be encouraged to raise safety concerns with their employer.

b) Emergency Preparedness

Emergency and response procedures should be in place, setting out clearly the action to be taken in the event of an emergency. Appropriate fire detection equipment, suppression equipment, spill drills and adequate exit facilities and recovery plans should be in place.

c) Occupational Injury and Illness

Procedures should be in place for preventing, managing, tracking and reporting occupational injury and illness.

d) Housing

Where worker's accommodation is provided it must be maintained in a clean and safe condition. Appropriate facilities must be provided - to meet the basic needs of the workers - such as adequate water, heat and ventilation and reasonable personal space.

3) Environment

a) Environmental Permits and Reporting

Supplier operations must maintain all the appropriate environmental permits and approvals.

b) Environmental Management

Suppliers must put in place appropriate management, operational and process controls to minimise the release of harmful emissions to the environment. Supplier operations should maintain and test appropriate spill response procedures at least annually.

c) Preferred JBS Suppliers must undertake initiatives to promote greater environmental responsibility, specifically:

- 1) JBS Suppliers must reduce their current GHG/CO2e emissions:
- 2) JBS Suppliers must declare their total tCO2e emissions figure for the most recent year;
- 3) JBS Suppliers must declare their CO2e Target weight figure for 2030 (ideally Net Zero);
- 4) JBS Suppliers must declare detail a credible annual plan to get to that figure.
- 5) JBS Suppliers must offset (CO2e emission carbon offsets) which 'cannot' be mitigated.
- 6) JBS Suppliers must identify and conserve non-renewable resources.
- 7) JBS Suppliers must manage waste responsibly (ie with the goal of zero landfill waste).
- 8) JBS Suppliers should track, report publicly & mitigate their environmental impact
- 9) JBS Suppliers should develop a plan to get to **zero carbon** environmental impact.

4) Community Development:

A) Suppliers should provide employees with at least a **Living Wage**

B) Suppliers should demonstrably improve the local communities where the supplier operates.

This can be by way of providing education, training, charity support or local facilities to the local area.

JBS Suppliers Code of Conduct: Summary

It is JBS Group's objective that JBS suppliers conduct themselves responsibly at all times, in relation to these 4 areas:

1) Business Ethics

- That JBS and our suppliers conduct our business with fairness, integrity & professionalism. (With legal compliance and fair & open procurement).

2) Labour & Human rights

- That JBS and the Supplier's staff are 1) Protected, 2) Respected and 3) their rights upheld, and any wrongs Remedied.

3) Environment

- That our Suppliers **measure** and mitigate the damage they are doing to the environment.
- That they implement Carbon Offsets
- That they pursue **ambitious Carbon Reduction Plans**. (eg 2030 Net Zero tCO2e)

4) Community Development

- That our Suppliers are **net contributors** to their community wellbeing and sustainable development.
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Appendix 1: Supplier Commitment to JBS Code of Conduct

- 1) *We, the undersigned, agree to comply with the JBS Supplier Code of Conduct.*
- 2) *We understand that JBS Group may require us to give evidence of compliance from time to time.*
- 3) *We agree to promptly and proactively disclose to JBS Management details of any 'undesired circumstances' should we come across these in our dealings with JBS Group. We understand such disclosure activity is in the best ethical interests and that JBS will keep the whistle-blower identity confidential, if requested.*
- 4) *We agree to **share the requirements of this code of conduct with any of our own staff** who may come in contact with JBS Group employees.*
- 5) *We agree to calculate our tCO₂e emissions each year and to disclose them, when requested, by JBS Group.*
- 6) *We undertake to inform JBS Group Procurement promptly (michelle.mccabe@jbs.group) in writing if we are no longer able to comply fully with this code.*

JBS Supplier Company name: _____

Signature: _____

Printed Name: _____

Position: (Owner/ Compliance Officer/ Production Manager) _____

Date: _____

Appendix 2:

JBS Group Monitoring of the Supplier Code of Conduct

JBS Procurement reviews each of our key suppliers annually. The Reviews have 3 aspects:

- 1) A **Quantitative report** ('Vendor Rating System Report' generated on JBS IQ system) will show the supplier statistics in terms of levels of deliveries On Time, In Full; number of split deliveries (invoices vs P/Os), number of mis-orders; credit notes etc. This gives the vendor a clear rating out of 100. This is to encourage the supplier to improve on their areas of weakness.
- 2) A **Supplier Assessment Form** – completed by the supplier. This gives the supplier an opportunity to show their Compliance, Certification and any Outstanding Performance within the areas of
 - a. Business Ethics,
 - b. Labour Practices,
 - c. Environment and
 - d. Community Development.
- 3) Referring to these first 2 more quantitative reports, JBS procurement will conduct a **Qualitative report**: discussing and assessing the Supplier's continued adherence (or not) to our CSR standards and where that supplier performs in relation to our Critical Issues. Where JBS identifies issues of concern, (such as our **Critical Issues**, listed below), we work with our supplier factories to make positive changes through Corrective Action Plans (CAPs).

Once a Corrective Action Plan has been applied and followed through, JBS will, if appropriate, commission a **follow up audit**. This will check that the non-compliance has been rectified.

NB JBS tries to work together with our sourcing partners to rectify any issues that we have detected. We believe this is best practice (as the alternative of JBS dropping a factory will only harm the workers). However, JBS will not work with a sourcing partner that does not show significant, timely improvements after a Corrective Action Plan has been outlined.

Critical Issues

eg *"This factory presents an immediate and critical risk to the business"*

There are severe and critical ETI base code violations

The resolution of these issues will require long term and resource-intensive action

Verification will require one or more factory follow-up visits to the factory

Examples of critical issues:

Child labour/Forced Labour

Unsanitary Conditions

Locked fire exits

Physical abuse

Deposits taken from workers (financial or identification documents)

Minimum wages not paid or Insufficient wages/overtime wages paid

Excessive overtime hours

Factory/Supplier actively hindering the staff right to exercise freedom of association

Unimproving/unacceptable environmental emissions

This Supplier Code of Conduct document applies to Suppliers to all JBS Group Companies (ie including suppliers to:- Anderco Safety (Ireland) Ltd, Anderco Safety (UK) Ltd., Romar Innovate Ltd., James Boylan Safety Ltd, James Boylan Safety (NI) Ltd.)

Revision status							
Document Name	From Revision	To Revision	Date amendment made:	Section amended:	Details of amendment:	Amendments made by:	Approved By:
JBS Supplier Code of Conduct	1 (5 th Nov 2017)	2	November 2021	Whole Document.	Update/General review to tie in with BMS.	Elaine Sheard	G Boylan
JBS Supplier Code of Conduct	2	3	March 2024	Whole Document.	Update/General review to tie in with EcoVadis and increased focus on Supplier ethics.	G Boylan	G Boylan