



# **BIC GROUP RESPONSIBLE SOURCING POLICY**

Effective Date: NOV-2025

Scope: All BIC product categories and all subsidiaries

Department Responsible: Global Procurement & Packaging Engineering

Policy Owner: Jose Golding-Webb, VP Global Procurement & Packaging Engineering

Prepared by: Svitlana Pashkovska, Sustainable Procurement



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Group Responsible Sourcing Policy  
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## INTRODUCTION

Since BIC launched its official sustainability journey in 2003, we have been focused on progressing on the path to providing responsible and affordable products to everyone. In 2018, we launched our sustainable development program "Writing the Future, Together", which solidified our commitment to sustainability.

The following Responsible Sourcing Policy builds on that commitment and future ones to deliver meaningful impact - in collaboration with our suppliers and partners.

This Policy is written to meet growing regulatory and stakeholder expectations for ethical and sustainable supply chain management. Increasingly, laws such as the EU Corporate Sustainability Due Diligence Directive, the UK Modern Slavery Act, and the U.S. Dodd-Frank Act require companies to demonstrate due diligence in their sourcing practices and to prevent human rights or environmental harms in their supply chains. Having a clear, formal policy allows us to align with these legal requirements, reflect international best practices such as the UN Guiding Principles and OECD Guidelines, and communicate our commitment to responsible, transparent, and sustainable sourcing to customers, investors, and partners.

## PURPOSE

The purpose of the BIC Responsible Sourcing Policy is to establish clear expectations for ethical, safe, and environmentally responsible sourcing practices. It serves as a framework for collaboration with suppliers and external business partners to ensure compliance with BIC's commitments in areas such as human rights, labor standards, environmental stewardship, and business integrity. By aligning sourcing activities with BIC's values and strategic goals, the policy aims to deliver real, measurable, and positive impact across the supply chain: improve conditions and drive sustainable, ethical progress throughout its network of suppliers and partners.

## SCOPE

This policy applies to all BIC's sourcing, both direct and indirect materials, subsidiaries, third party manufacturers, original equipment manufacturers (OEM) and services covering all procurement categories of the Group, in all geographies.

We formally require our suppliers to adhere to this policy, and track their full compliance throughout their operations, ensuring it extends across their entire value chains, i.e. including their own upstream suppliers.



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## COMMITMENTS

### BUSINESS INTEGRITY AND STANDARD

#### **Compliance with Laws**

BIC is committed to ensuring compliance with all applicable laws and regulations throughout our supply chain. We require our suppliers to operate their production, extraction, manufacturing, and trading processes ethically and in accordance with the law.

#### **Ethical Business Practices**

BIC does not tolerate any form of corruption or bribery (regardless of the amount), whether direct or indirect, passive or active, public or private, on the part of team members or our business partners, or influence peddling or facilitation payments. We expect our suppliers to comply with all applicable anti-bribery and anti-corruption laws. We prioritize secure sourcing and respecting the integrity of our business by having a zero-tolerance policy towards any form of bribery, corruption, conflict of interest, extortion, and embezzlement across our operations. As part of this commitment, we exclude any potential sourcing from, e.g., armed groups or those linked to money laundering.

### HEALTH AND SAFETY

#### **Product Safety**

BIC is dedicated to ensuring the quality and safety of our products throughout the entire supply chain. We have established precise expectations regarding product safety and checklists provided to suppliers. This framework is in place to guarantee that the products we manufacture meet safety standards for human health and the environment.

#### **Health, Safety & Security in Suppliers' Workforce**

BIC expects all suppliers to uphold high standards of health, safety within their operations. This includes providing a safe working environment, complying with relevant occupational health regulations, and implementing preventive measures to reduce risks of injury or illness. Suppliers must ensure that their workforce has access to appropriate safety equipment, training, and emergency procedures, contributing to the overall well-being and dignity of every worker in the supply chain.

### HUMAN RIGHTS AND LABOR RIGHTS

#### **Respect Human Rights and Labor Rights**

BIC is committed to working with suppliers who:

- Comply with international human rights principles, including the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Conventions, the International Labor



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Organization's 1998 Declaration on Fundamental Principles and Rights at Work, and the United Nations Global Compact

- Promote and respect human rights throughout their supply chains, including but not limited to recognizing the rights of workers and preventing non-responsible working practices.
- Recognize the rights of all workers throughout the supply chain, including freedom of association and collective bargaining, legal and decent working hours, safe and healthy workplaces, respect for minimum wages, stable benefits and welfare protection, and the prevention of irresponsible and abusive working practices such as forced labor, child labor, any forms of modern slavery, discrimination, harassment, and violence (including gender-based violence).
- Ensure and promote equality, diversity, and inclusion throughout the supply chain, while actively working towards gender equality and empowering women throughout the supply chain.

To ensure these principles are respected and to foster continuous improvement, BIC carries out regular due diligence, evaluation, and audits. BIC expects its suppliers to cooperate fully and transparently with any assessments, audits, or information requests related to responsible sourcing.

## ENVIRONMENTAL IMPACT

### **Climate Change, Energy Consumption and Carbon Emissions**

BIC is committed to acting against climate change, reducing carbon emissions and energy consumption, and promoting the use of energy from renewable sources all along the supply chain.

### **Forests**

Recognizing the specific environmental impact potentially associated with forest-risk commodities, BIC is committed to place a dedicated focus on the responsible management of these materials (see dedicated section).

### **Waste Management & Resources Preservation**

We are focused on reducing the use of virgin raw materials in our products and minimizing water consumption. Where feasible, we aim to advocate for the integration of recycled materials and continuous improvement of waste management systems.

To achieve this, we actively champion the development of circular processes at all stages of the supply chain and the product life cycle.

## SUPPLY CHAIN ENGAGEMENT

### **Traceability and Transparency**

To deploy the most effective and relevant actions, BIC commits to continuously identifying and investigating potential risks within our supply chain.



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To achieve this, we will use specific analysis tools to better assess suppliers for any risks associated with their commodities and operations. Additionally, we will increase traceability for our production/extraction regions, allowing us to obtain detailed information about the origins of the supplies provided by our suppliers.

At BIC, we are against animal testing. BIC does not test its products or ingredients on animals except where such testing is explicitly required by applicable law or regulation.

### **Collaboration with Suppliers and Stakeholders**

When it comes to responsible sourcing, we believe collaboration with suppliers and other external stakeholders is key. By joining forces in the relevant industrial sector, we increase our leverage effect and accelerate transformation of our supply chains. In that sense, BIC remains committed to fostering strong partnerships to increase knowledge and drive proactive measures in addressing key areas of risk.

Moreover, we expect all our suppliers to take action to align with BIC's commitments. To that end, BIC will prioritize suppliers who can demonstrate active support and concrete progress on that matter and will consider termination of business relationship with those who ultimately do not comply with our policy.

### **Continuous Improvement**

As we require our suppliers to respect the aforementioned principles, we commit to providing them with training and support to meet our responsible sourcing standards.

Moreover, the Group will engage with suppliers to verify their compliance by establishing audit programs and implementing external evaluation tools.

We will review our policies periodically to ensure that our commitments remain in line with the sector, consumers, and civil society expectations, and will address any identified risks associated with our sourcing.

### **Focus: Forests Risk Commodities and Cellulose Packaging**

At BIC, the raw materials we source from forest-risk commodities are almost entirely derived from timber and timber-based products, in particular cellulose used for packaging. As we continue decreasing plastic and increasing cardboard primary packaging, the importance of cellulose-based materials is expected to grow in the coming years.

BIC is committed to sourcing cellulose packaging responsibly, whether directly for our operations or at contract manufacturers, in a way that minimizes environmental impact and supports biodiversity. As part of our due diligence process, we aim to mitigate sourcing risks by committing to the following guidelines for 100% of our primary and secondary packaging (outers and displays):

- Prioritize recycled cardboard: recognizing that recycled cardboard has a lower overall environmental impact compared to virgin cardboard, we commit to use the highest



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possible percentage of recycled content, provided it meets the required quality standards and actual feasibility

- When virgin cardboard is necessary, either partially or entirely, give preference to certified sources: favor internationally recognized certification schemes that promote sustainable forestry practices and uphold human rights
- Ensure compliance with applicable regulation: adhere to the European Union Deforestation Regulation (EUDR) and all relevant local laws and standards

For wood-based products, such as wooden pencils, we privilege certified sources.

### Focus: Conflict Minerals

BIC continues to improve its due diligence process to address risks associated with conflict minerals, thus to ensure that our supply chain does not contribute to armed conflict, human rights abuses, or environmental harm. BIC requires its metal suppliers to conduct due diligence on the origin and chain of custody of tin, tungsten, tantalum, and gold (3TG), commonly referred to as conflict minerals. To ensure full coverage of possible presence of 3TGs, all BIC metal suppliers are required to complete the Conflict Minerals Reporting Template (CMRT) annually and demonstrate compliance with applicable regulations.

## ROLES AND RESPONSIBILITIES

- **BIC Global Procurement team** is responsible for integrating the policy into sourcing strategies, supplier selection, and contract management. They are accountable for monitoring supplier compliance and initiating corrective actions when necessary.
- **Legal and Compliance teams** are consulted to ensure alignment with applicable laws and ethical standards.
- **Suppliers** are expected to sign and fully adhere to the policy and cascade its principles throughout their own value chains.
- **BIC Sustainability Council and Group Policy Committee** are informed of policy performance and risks and supports its continuous improvement. All BIC team members involved in procurement and supplier engagement must understand and uphold the standards outlined in this policy.

## EXEMPTIONS

No exemptions are foreseen for the application of the BIC Responsible Sourcing Policy.

## DEVIATIONS

BIC monitors supplier adherence to the Responsible Sourcing Policy through evaluations, ongoing engagement, and audits. In cases where deviations from the policy are identified, BIC will initiate corrective actions in collaboration with the supplier. If non-compliance persists or poses significant risk, BIC may escalate the issue, including suspension or termination of the business relationship.



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All deviations are documented and reviewed to ensure continuous improvement and accountability across the supply chain.

## DEFINITIONS

- **Circular processes** : production and consumption systems designed to minimize waste, reuse materials, and keep resources in use for as long as possible.
- **Conflict minerals**: minerals mined in conditions where armed conflict and human rights abuses occur. Often refer to four minerals – tungsten, tantalum, tin and gold (also known as 3TG).
- **Due Diligence**: A structured process to identify, assess, and mitigate risks related to sourcing activities.
- **Responsible Sourcing**: Ethical procurement practices that consider human rights, environmental impact, and business integrity across the supply chain.
- **SpeakUp Platform**: BIC's confidential channel for reporting unethical or illegal practices.
- **Strategic Suppliers**: Key suppliers critical to BIC's operations, subject to enhanced monitoring and engagement, definition based on BIC internal criteria.
- **Upstream suppliers** : suppliers of BIC suppliers, also called tier 2,3,4... suppliers

## BIC SPEAK UP PROGRAM

BIC is committed to creating an environment of trust that fosters transparency, open communication and encourages internal and external stakeholders to report all known or suspected violations of BIC Code of Conduct, Group policies and applicable laws, without fear of retaliation.

As part of BIC's "Speak Up" program, we encourage all suppliers and stakeholders to report potential violations or concerns through our BIC SpeakUp Line ([www.bicspeakup.com](http://www.bicspeakup.com)), even anonymously if they so choose. You may also contact us through different channels, such as your BIC contact or the following e-mail address: [sustainable.procurement@bicworld.com](mailto:sustainable.procurement@bicworld.com).

BIC takes all allegations seriously and ensures that all reports are investigated in an independent, confidential and timely manner. BIC strives to implement timely and adequate remediation, as appropriate.

BIC has a zero-tolerance policy on retaliation against anyone who reports known or suspected violations in good faith or anyone who participated in an investigation.





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## CONTACT

You may also contact us via : **[sustainable.procurement@bicworld.com](mailto:sustainable.procurement@bicworld.com)**

## REVIEW CYCLE

The general supervision and administration of this policy are the responsibility of Sustainable Procurement and any change must be approved in advance by VP Procurement and Packaging Engineering. This policy must be reviewed every two years or more often if needed:

Revision	Date	Description of Change	Revised By	Approved By
New	MAR-2024	Established Policy	Svitlana Pashkovska	Jose Golding-Webb, Helen Sahi
Update	NOV-2025	Updated Policy key changes include: - completed Ethical Business Practices; Health, Safety & Security in Suppliers' Workforce; Respect Human Rights and Labor Rights paragraphs - added paragraphs on Forests risk commodities and Cellulose Packaging; Conflict minerals - integrated link to BIC SpeakUp program - Aligned with requirements of Group Policy Guidebook	Svitlana Pashkovska	Jose Golding-Webb, Helen Sahi

## ANNEX - ADDITIONAL POLICIES

This policy is aligned with specific commitments made by the BIC Group to our suppliers. For more details on the areas of commitment, please consult:

- BIC Code of Conduct: **<https://corporate.bic.com/en-us/code-of-conduct-policy>**
- BIC Supplier Code of Conduct: **[https://mediabic.bic.com/image/upload/v1729668301/scod\\_2ac8a18c71.pdf](https://mediabic.bic.com/image/upload/v1729668301/scod_2ac8a18c71.pdf)**
- BIC Anti-Corruption Policy: **<https://corporate.bic.com/en-us/anti-corruption-policy>**