



# SUPPLIER CODE OF CONDUCT



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Scope: All BIC team members and Suppliers

Department Responsible: Global Procurement & Packaging Engineering

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# 1. PURPOSE OF THE SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct (the «Code») defines the standards that apply to any organization or individual that works with BIC and its affiliates (the «BIC Group») to support their operations, products, or services. This includes any third party that provides goods or services to BIC, regardless of contractual form or geographic location, such as service providers, contract manufacturers, consultants, agents («Supplier»), and any third party engaged by the Supplier to deliver goods and services.

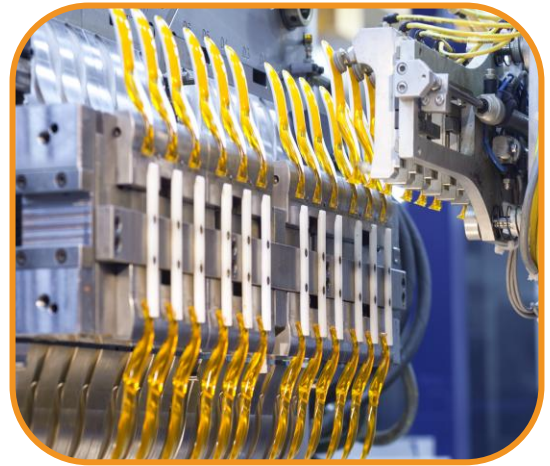
This Code outlines the expectations from our Suppliers with respect to responsible sourcing including our commitments to business ethics, human rights, environmental protection, health and safety and the development of a diverse and sustainable supply chain. All Suppliers must communicate these expectations throughout their supply chain.

All suppliers must comply with all applicable national, state and local laws/regulations in the markets where they operate. Where local laws or standards differ from this Code, Suppliers are expected to comply with the more stringent standards and principles.

In the spirit of continuous improvement BIC is committed to working collaboratively with Suppliers to meet and exceed the requirements set forth in this Code.

## Acceptance and Acknowledgement

This Code applies to, and is binding upon, each Supplier that provides goods or services to the BIC Group. Acceptance of this Code may be provided electronically, including by ticking the relevant box and clicking “I Agree” (or equivalent) in the Buy4BIC or equivalent portal, and such electronic acceptance constitutes a valid acknowledgement. Any acknowledgement submitted through this supplier portal account will be treated as made for and on behalf of the Supplier associated with that account and will be binding upon that Supplier.



## 2. INTRODUCTION TO SUSTAINABLE PROCUREMENT AT BIC

The principles of sustainable procurement are integral to our business strategy:

- Value creation
- Sustainable environmental performance
- Corporate social responsibility

At BIC, our six core values - Integrity, Responsibility, Teamwork, Simplicity, Sustainability, and Ingenuity - guide our approach to sustainable development and shape how we engage with our suppliers.

Sustainable procurement is integrated into our strategy, daily operations, and supplier relationships.

All BIC entities and suppliers are expected to identify, prevent, and manage health and safety, social, and environmental risks within their supply chains.





### 3. BIC'S COMMITMENT TO SUPPLIERS

BIC seeks to work with Suppliers who act responsibly, operate with integrity, and support sustainable development. BIC's goal is to partner with Suppliers who deliver value for cost while applying these same principles throughout their own supply chains.

BIC uses defined methodologies to support strategic procurement and to guide Supplier relationships, ensuring negotiations that are fair, competitive, and transparent, in line with its policies and values.

BIC conducts business with integrity and expects the same high standards from all its partners. For full details on how BIC operates, please refer to the [\*\*BIC Code of Conduct\*\*](#) and [\*\*BIC Group Responsible Sourcing Policy\*\*](#).

## 4. BIC'S EXPECTATIONS FROM SUPPLIERS



BIC expects our suppliers to meet high Business Integrity, Social, Environmental and Health and Safety standards:

### ❖ BUSINESS INTEGRITY AND STANDARDS

#### Laws and Regulations

Suppliers must operate their production, extraction, manufacturing, and trading processes ethically and in accordance with applicable laws and regulations.

#### Trade Control Compliance

Suppliers must comply with all applicable international, regional and national laws and regulations, decrees or rules governing the transfer of goods, services, and information, including import/export controls, customs requirements, foreign trade controls and trade sanctions issued by the UN, the EU, the United States, and other relevant authorities having jurisdictions over the Supplier or the transactions. Suppliers must maintain vigilance in preventing any breach of these obligations, obtain and keep all required import/export licenses and authorizations, and provide accurate information to BIC, customs and other authorities whenever applicable.

#### Competition and Anti-trust Laws

Suppliers must conduct all business activity with integrity, in full compliance with all applicable antitrust and competition laws. They must compete fairly and refrain from any practices that unlawfully restrict, distort, or undermine competition.

Suppliers must not engage in, attempt to enter into, or discuss with competitors any

agreement or concerted practice that could restrict competition, including price fixing, coordinating business terms, limiting production, allocating markets or customers, or agreeing to refuse certain partners. Sharing commercially sensitive information is strictly prohibited except where permitted by law and subject to appropriate safeguards.

#### Bribery and Corruption

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 business partners. BIC requires its Suppliers to comply with all applicable anti-bribery and anti-corruption laws, including the US Foreign Corrupt Practices Act, the UK Bribery Act, the French Sapin II law.

Suppliers must never offer, promise, authorize, request, or accept anything of value to influence a business decision in an improper way. This includes bribes, kickbacks, extortion, influence peddling, facilitation payments, and excessive gifts, hospitality, donations, or other benefits and improper payments.

All business activities must be conducted transparently and recorded accurately in the Suppliers' books and records.

Suppliers are strongly encouraged to report any concerns about bribery or corruption to their BIC contact or through the BIC Speak Up portal (section 6. RAISING A CONCERN).

## **Conflicts of Interest**

Suppliers must avoid creating any conflict of interest and should not engage in situations where their own personal or financial interests could influence (or appear to influence) their business decisions related to BIC. Any conflict of interest, whether actual or potential, must be disclosed immediately to BIC as soon as it is identified so it can be assessed and managed appropriately (refer to section 6. RAISING A CONCERN).

## **Gifts and Entertainment**

Suppliers are expected to ensure that any gifts, hospitality, entertainment, or similar benefits offered to BIC employees (or received from them) are reasonable, modest, occasional, and never intended to influence a business decision. These interactions must comply with applicable laws and policies of all parties involved. Gifts and entertainment must not create a sense of obligation or give the impression of improper influence, as they may be viewed as bribery, kickback, conflict of interest or influence peddling.

Suppliers are expected to maintain appropriate rules and controls to prevent gifts or entertainment from being used as, or perceived as, bribes, especially when government officials are involved.

## **Cybersecurity, Confidentiality and Data Protection**

BIC confidential information may include nonpublic financial data, business plans or strategies, pricing, customer lists, trade secrets, personal data, or any other BIC

information not publicly available. Suppliers are expected to use this information only for its intended purpose, store it securely, and prevent unauthorized access, loss, or misuse.

Suppliers must demonstrate compliance with a generally accepted cybersecurity framework and protect BIC's confidential information and personal data with reasonable technical, organizational and physical safeguards and security measures.

BIC confidential information must not be disclosed or shared with any third-party, external tools or technologies, including artificial intelligence, without BIC's prior authorization in the form of a contractual agreement.

Suppliers must comply with all applicable data protection laws, including the EU General Data Protection Regulation 2016/679 ("GDPR"), and local privacy requirements. Personal data must be used only for specific and legitimate purposes, limited to what is necessary, kept accurate, secure, shared only with appropriate safeguards, and retained only as long as needed for its intended purpose. Suppliers must ensure that access to personal data is restricted to authorized personnel bound by appropriate confidentiality obligations.

Suppliers must respect and facilitate the rights of data subjects in accordance with applicable law, including the rights of access, rectification, erasure, restriction, objection, and data portability. Suppliers must also cooperate with BIC in responding to data subject requests and regulatory inquiries.

Suppliers are expected to provide prompt, but no later than 72 hours after discovery, written notice to BIC of:

- Actual or potential unauthorized access, use, disclosure, modification storage, destruction, or loss of BIC confidential information in supplier's or supplier's personnel's possession, custody, or control
- Interference with system operation in an information system or in any medium or format, including paper (hard) copy documents, that subjects BIC confidential information to risk of unauthorized access, use, disclosure, modification, storage, destruction, or loss
- Any other similar incident as may be so defined by any data protection laws and by any laws and regulations (national, federal, state, and provincial) relating to the protection of BIC confidential information
- Notifications must be sent to [privacy@bicworld.com](mailto:privacy@bicworld.com) and [cyber.security@bicworld.com](mailto:cyber.security@bicworld.com)

Suppliers are expected to fully cooperate in any related investigation or remediation measures.

Suppliers are not allowed to record meetings, conversations, or communications related to BIC without prior authorization.

Suppliers must keep accurate and up to date records related to their business with BIC.

Suppliers must at all times be able to demonstrate their compliance with applicable laws and regulations and shall, upon BIC's request, provide all relevant information and documentation necessary to evidence such compliance.

## External Communication and Social Media

Suppliers must not speak on behalf of BIC in any form of external communication, including interactions with media, investors, community representatives, government officials, customers, or on social media. Any inquiries directed to Suppliers about BIC or its activities must be referred to BIC's Communications or Investor Relations teams at [media@bicworld.com](mailto:media@bicworld.com).

Suppliers are expected not to make misleading, inappropriate, offensive, or harmful statements (online or offline) about BIC, its employees, customers, consumers, partners, competitors, or any other stakeholders.



## ❖ HUMAN RIGHTS AND LABOR STANDARDS

BIC is committed to making a positive impact on human rights and society and expects Suppliers to share this commitment. Suppliers must respect and promote human rights throughout their operations and supply chains and act in line with the principles and standards set by BIC.

Suppliers are required to 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 Labor Organization (ILO) Conventions, the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work, United Nations Global Compact and the OECD Guidelines for Multinational Enterprises.

Suppliers must meet the following minimum expectations:

### Child Labor

BIC will not accept the use of child labor in its operations under any circumstances and will not purchase product(s) from any Supplier that uses child labor.

Suppliers must not use child labor, which includes anyone under 15 years old or below the legal minimum working age or mandatory schooling age - whichever is higher. While the use of child labor is strictly prohibited, BIC supports legitimate apprenticeship programs that provide educational value for young people and comply with applicable laws.

### Forced Labor

BIC forbids all forms of forced labor, modern slavery and any exploitative labor practices within its own operations and supply chain, including human trafficking, prison labor, debt bondage, withholding of wages, restrictions on freedom of movement within the workplace, involuntary overtime, the confiscation of identity documents, etc.

BIC will not buy products or services from any Supplier that engages in these practices.

Suppliers must make sure that all workers are employed voluntarily. Workers must not be made to work because they fear punishment, dismissal, reporting to authorities, or because they did not meet production targets.

Forced prison labor or any work demanded against a worker's will - including work used for political pressure or punishment for political views - is strictly forbidden.

Workers must not face harsh or inhumane treatment, corporal punishment, threats of physical or sexual violence, or any kind of mental, psychological or physical abuse, intimidation, or coercion. Disciplinary actions must not include wage deductions, loss of benefits, or requirements to perform compulsory work.

Suppliers must not withhold any part of a worker's wages, benefits, personal property, or identity documents to force them to continue working.

Suppliers must ensure that workers are not required to pay recruitment fees or any related costs, directly or indirectly at any stage of the hiring process. The employer shall bear all recruitment-related costs.



## Freedom of Association and Collective Bargaining

Suppliers must respect employees' right to freedom of association and collective bargaining. This means workers must be free to join or not join organizations of their choice and to take part in collective bargaining, as allowed by local laws and regulations. Suppliers must not interfere with, restrict, or punish workers for exercising these rights.

## Non-discrimination

Suppliers shall provide equal access to employment opportunities and resources and shall not tolerate discrimination in any aspect of employment.

Suppliers shall ensure that all employment-related decisions (e.g., hiring, promotion, training, relocation, performance management, disciplinary actions, layoffs, working hours, compensation, benefits, and health and safety) are made fairly and based only on a worker's ability, qualifications, performance and objective criteria.

Suppliers must not discriminate against any workers on the basis of grounds such as age, race, religion, color, ethnicity, national origin, disability, sexual orientation, gender, gender identity, gender expression, marital status, or any other characteristic protected by applicable local law.

## Abuse and Harassment of Labor

Suppliers shall provide a workplace free from harassment, bullying, abuse, and any form of intimidation - whether physical, sexual, racial, psychological, or verbal. No worker should ever face threats, punishment, humiliation, or any behavior that creates fear or discomfort or offensive work environment.

Harassment includes any conduct intended to threaten, intimidate, or pressure a worker, or any behavior that, in the workers' view, interferes with their ability to perform their job. It may or may not involve a protected characteristic.

Sexual harassment is strictly forbidden. This includes unwelcome sexual advances, requests for sexual favors, or any verbal or physical behavior of a sexual nature that creates an intimidating, hostile, or offensive work environment.

Harassment is defined by the impact on the victim, not the intention of the person committing it.

Workers must be able to raise concerns or report incidents without fear of retaliation. Suppliers are expected to establish confidential and accessible grievance mechanisms and to investigate allegations promptly and impartially.

## Wages and Benefits

Suppliers should target paying their employees a fair living wage. Pay must meet at least the legal minimum wage or the standard wage for the industry in that location - whichever amount is higher.

## Working Hours

Suppliers must follow national laws, collective agreements, and any applicable local standards on working hours and rest periods.

## Land Rights

Suppliers shall respect the legitimate land

rights of individuals, indigenous people, and local communities. All negotiations about their property or land, including the use of and transfers of it that may affect such rights, shall adhere to the principles of free, prior and informed consent, contract transparency and disclosure.

## Compliance with Human Rights and Labor Standards

BIC expects its Suppliers to cooperate fully and transparently with any audits or information requests to verify and assess compliance with Human Rights and Labor standards.



## ❖ HEALTH AND SAFETY STANDARDS

### Product Safety and Regulatory Compliance

Suppliers are expected to:

- Ensure that all materials, components, and finished goods supplied to BIC are safe for their intended use and comply with applicable product safety, chemical, environmental, and consumer protection regulations in the country of manufacture and in the jurisdictions agreed with BIC.
- Comply with BIC product safety specifications and restricted substance requirements.
- Provide accurate information regarding the safety, regulatory status, and composition of supplied materials as necessary for BIC to assess product safety and regulatory compliance.
- Where required, provide detailed composition information under appropriate confidentiality arrangements, including, where applicable, a non-disclosure agreement or other legally binding confidentiality obligation. Such information shall be treated as confidential by BIC and accessed only by authorized personnel and qualified third parties acting on behalf of BIC and subject to equivalent confidentiality obligations.
- Promptly inform BIC of any known product safety issue, regulatory non-compliance, or significant changes to materials, formulation, manufacturing processes, production location, or sub-suppliers that could affect product safety or regulatory compliance.
- Maintain appropriate traceability of materials and, where reasonably requested, provide documentation or test data necessary to

demonstrate compliance with applicable regulations and BIC requirements.

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

Suppliers are expected to provide safe, healthy, and inclusive working conditions for all employees and any third parties on site. A safe workplace depends on following all applicable laws, standards, and recognized best practices in health and safety.

Everyone in the workplace is responsible for contributing to a safe environment. Suppliers should encourage employees to report any situation that could affect their own health or safety or that of others, ensuring their non-retaliation protection.

### Compliance with Laws and Regulations

Suppliers must meet all relevant local, regional, national and where applicable, international health and safety laws and regulations. This includes requirements for the design, construction, and proper maintenance of facilities used by employees and contract workers, as well as appropriate safety procedures, training, and protective equipment to prevent workplace injuries and illnesses.



## Health and Safety Policy and Management Systems

Suppliers are expected to have a publicly available health and safety policy and a clear management system that supports it. This includes:

- Clear assignment of management responsibility for health and safety
- Procedures for identifying, reporting, and correcting incidents and events (Lost Time Incidents, Restricted Working Cases, Medical Treatment Cases, near misses, unsafe acts or conditions), including the definition of Incident Rate targets and KPIs that are monitored and actioned for improvement (e.g. Lost Time Incident Rate, Total Incident Rate).
- Regular monitoring and follow up on corrective actions.

## Safe Working Environment

Suppliers are expected to maintain a work environment that is safe, healthy, clean, and well lit where relevant to the workplace. Workers must be protected from hazardous materials, unsafe equipment, and dangerous conditions, including psychosocial risks and fatigue.

Cruel, unsafe, or degrading disciplinary practices are strictly forbidden.

When Supplier employees work or visit BIC premises, they must:

- Know and follow BIC's safety and environmental rules
- Receive job specific and site-specific safety training

- Remain under the supervision of a designated BIC team member

## Risk Assessment

Suppliers are expected to conduct regular health and safety risk assessments. These should:

- Address both common and sector-specific risks
- Consider emerging issues and good industry practices
- Lead to concrete actions that reduce or eliminate identified risks

## Continuous Improvement

Suppliers are expected to continually improve their health and safety performance to prevent accidents and injuries. Adoption of externally verified or certified health and safety management systems is encouraged.

## Emergency Preparedness

Suppliers are expected to establish and maintain emergency preparedness and response procedures applicable to their operations and risks. This includes documented emergency plans with assigned roles and responsibilities, regular drills to verify their effectiveness, and emergency equipment that is properly maintained and accessible. Suppliers must promptly notify relevant authorities and BIC of any emergency that affects personnel safety, product integrity, or supply continuity. Emergency plans should be reviewed at regular intervals and updated following any significant incident or material change in operations.



## ❖ ENVIRONMENTAL IMPACT

BIC is committed to reducing the environmental impact of its brands, products, operations, and entire supply chain. Managing environmental impacts is essential to BIC's business, its communities, and long-term success.

Suppliers play a key role in helping BIC meet these commitments. Suppliers are expected to work with BIC to reduce environmental impacts in all activities, from sourcing to production to distribution.

Everyone involved in BIC's supply chain is responsible for acting in a way fully adhering to local regulations, protecting the environment and supporting sustainable practices.

BIC collaborates with its Suppliers, customers, and consumers to improve environmental performance throughout the full supply chain.

Suppliers are expected to support this effort by adopting responsible practices, sharing relevant information, and making improvements where needed.

### **Environmental Policy and Regulations**

Suppliers are encouraged to have an environmental policy and an assessment that

identifies the main environmental impacts of their operations and commit to continuous improvement.

Suppliers must comply with all applicable environmental laws and regulations, including those related to emissions, waste, water, chemicals, and resource management.

Where relevant, suppliers are expected to provide accurate and timely environmental data to support BIC's reporting obligations under the Corporate Sustainability Reporting Directive (CSRD) and its associated European Sustainability Reporting Standards (ESRS).

### **Reduce Environmental Impacts**

Suppliers are expected to work continuously to minimize their environmental footprint using reasonable and appropriate measures for their operations. This includes:

- Measuring and reporting their greenhouse gas emissions, and collaborating with BIC on the identification and reduction of emissions across the value chain in line with recognized frameworks such as the GHG Protocol
- Reducing energy use and improving efficiency

- Managing all substances and processes to prevent pollution by minimizing environmental releases
- Minimizing waste and increasing recycling or reuse
- Using natural resources efficiently
- Managing water responsibly
- Recording and reporting environmental incidents (for example, spills, illegal discharges, regulatory breaches), and actioning for improvement.

Suppliers are required to consider environmental impacts when making business decisions and adopting new processes or technologies.

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

BIC expects its suppliers to ensure that all forest-based materials are sourced responsibly to protect ecosystems and biodiversity. Suppliers are encouraged to:

- Prioritize recycled materials - use the highest feasible percentage of recycled cardboard that meets quality and performance requirements.
- Use certified virgin materials when needed - if virgin fiber is required, source only from internationally recognized, sustainably managed, and human rights compliant certification schemes.
- Deforestation Regulation (EUDR) and all applicable local laws.
- Source all timber and wood derived products (e.g., wooden pencils) from certified, responsibly managed forests.

### **Focus: Conflict Minerals**

BIC expects its suppliers to ensure that materials containing tin, tungsten, tantalum, and gold (3TG) do not contribute to conflict, human rights violations, or environmental harm. Suppliers are required to:

- Conduct due diligence - trace the origin and chain of custody of all 3TG minerals used in supplied materials.
- Complete the Conflict Minerals Reporting Template (CMRT) each year to ensure full transparency and regulatory compliance.
- Comply with all applicable conflict minerals related laws and regulations.

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

Suppliers are expected to support the responsible use of resources and reduction of waste throughout the supply chain by:

- Reducing virgin raw materials - prioritize recycled or reclaimed materials wherever technically and commercially feasible.
- Minimizing water use - implement practices that reduce water consumption and improve efficiency.
- Improving waste management - strengthen waste handling systems to reduce, reuse, and recycle materials whenever possible and comply to the EU Packaging and Packaging Waste Regulation (PPWR) where relevant or to local laws and regulations.
- Supporting circularity - promote circular processes across production, packaging, and end of life stages.

## 5. DEMONSTRATING COMPLIANCE

Compliance with this Supplier Code of Conduct may be verified through assessments such as third-party audits, requests for information or documentation from Suppliers, and reviews conducted in response to allegations of non-compliance.

Suppliers must promptly address any deviations from BIC's requirements.

- When issues are identified, suppliers are expected to work with BIC through corrective actions to resolve them within agreed timelines.
- If non-compliance persists or presents a significant risk, BIC may escalate the matter, including suspension or termination of the business relationship.

All deviations and actions taken are documented to support continuous improvement and accountability. Suppliers are expected to cooperate fully with these requests and provide accurate and timely information.



## 6. RAISING A CONCERN

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

Suppliers have several reporting channels available, including reaching out directly to their contact at BIC or using the confidential BIC Speak Up Line. The BIC Speak Up line is managed by an external service provider and available in local language via telephone, email or internet, 24 hours a day, 7 days a week. It also allows reporters to remain anonymous if they choose so. 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.

Contact details for BIC Speak Up are as follows: [www.BICspeakup.com](http://www.BICspeakup.com)

### **Further information and support**

For further information please visit BIC's website [www.BICWorld.com](http://www.BICWorld.com) to access copies of BIC Code of Conduct, policies ([Ethics | BIC Investors](#)) and BIC's annual Universal Registration Document ([URD | BIC Investors](#)).

