
Supplier Code of Conduct

boxxe regards corporate integrity, responsible product sourcing, and the safety and wellbeing of workers across its global supply chain as issues of great importance. This Code of Conduct explains the core standards and policies under which we operate. It describes how we should conduct ourselves in the workplace and marketplace and recognises our commitment to the environment and communities in which we operate. It also describes how each of us should handle various legal and ethical matters.

These principles are reflected in this Code of Conduct, which establishes the minimum standards that must be met by any supplier that sells goods or services to or does any business with boxxe.

boxxe expects all of its manufacturers, distributors, vendors, and other suppliers to place as much importance on these principles as boxxe does and to take proactive measures to avoid environmental and social harm.

Suppliers are also responsible for ensuring compliance with the Code of Conduct by all of their suppliers, vendors, agents, and subcontractors.

Upon request, boxxe expects its suppliers to disclose the names and contact information of its own suppliers, vendors, agents and subcontractors as well as verify their compliance with the key principles of this Code of Conduct.

1. Employment, Modern Slavery and Human Trafficking

a. Modern Slavery

Suppliers must both comply with all applicable human rights and employment laws in the jurisdictions in which they work. This includes complying with the provisions of the Modern Slavery Act 2015 as well as the principles set out in this Code of Conduct and boxxe's [Modern Slavery Statement](#). Further, any boxxe suppliers are required to sign a form certifying modern slavery compliance as part of the boxxe onboarding process to confirm their adherence to the Modern Slavery Act 2015 and boxxe's Modern Slavery Statement.

boxxe remains fully committed to the eradication of modern slavery in all of its forms and expects that its suppliers have robust means of ensuring that the subcontractors in its own supply chain also comply.

Suppliers must align with boxxe by agreeing that they will:

- i. not support or engage in slavery or human trafficking in any part of its supply chain;

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- ii. not, and will ensure that their partners, subcontractors, agents or own suppliers do not, support or engage in, or require any compelled, involuntary, or forced labour, labour to be performed by children, bonded labour, indentured labour and prison labour;
- iii. notify us within a reasonable time frame in the event that any instance of modern slavery is identified in its supply chain, and in any event no later than ten (10) working days;
- iv. ensure it has its own appropriate service level agreements in place within its supply chain in respect of identifying and acting on any suspected instances of modern slavery; and
- v. provide suitable and appropriate access to remedy, compensation and justice for victims or slavery.

boxxe holds itself and its suppliers accountable to:

- vi. maintain clear policies and procedures preventing exploitation and human trafficking, and protecting its workforce and reputation, which are to be reviewed on an annual basis;
- vii. have robust measures in place to check its supply chains, for example, by making appropriate checks on all employees, recruitment agencies, suppliers, etc with a robust supplier onboarding process;
- viii. ensure there is an open and transparent grievance process in place for all staff;
- ix. seek to raise awareness so that colleagues know what boxxe/the supplier is doing to promote their welfare;
- x. ensure that staff are aware of the risk of modern slavery and ensure there is a whistleblowing policy or other reporting process in place to raise concerns internally;
- xi. provide suitable and appropriate access to remedy, compensation and justice for victims or slavery, which boxxe does through its support of non-governmental organisations (NGOs) to help support victims of modern slavery; and
- xii. where legally required, publish a clear annual statement setting out the steps taken to ensure slavery and human trafficking is not taking place in its supply chains and to demonstrate that it is taking the responsibilities to its employees and customers seriously (please see boxxe's [Modern Slavery Statement](#)).

boxxe requires all of its employees to undergo annual compliance training on modern slavery and expects that its suppliers commit to no less than the same standards to ensure, as a minimum, mandatory training to those staff members who are involved in managing its recruitment and supply chains.

boxxe also recommends that its suppliers consider the robustness of their understanding of modern slavery in their supply chains, by utilising such guidance and resources such as the [ETI Base Code](#); [Dhaka Principles for Migration with Dignity Implementation Guide](#) and [Verité's Fair Hiring Toolkit for Suppliers – Step 1](#), which offer practical tools for improving recruitment practices, developing robust codes of conduct, and mitigating the risk of forced labour.

b. Compliance and Documentation

Suppliers must implement and maintain a reliable system to verify, and keep records regarding, the eligibility of all workers, including age eligibility and legal status of foreign workers.

c. Identification Papers

Suppliers must not require any worker to surrender control over original:

- i. identification papers or documents giving a foreign worker the right to work in the country;
- ii. identification papers or documents, such as a passport, giving a foreign worker the right to enter or leave the country; or
- iii. documents, such as a birth certificate, evidencing the worker's age.

d. Financial Obligations

Suppliers must not, whether or not as a condition to the right to work, require any worker (or worker's spouse or family member) to, directly or indirectly:

- i. pay recruitment or other fees or other amounts (whether this is in cash or by another means, e.g. services or goods);
- ii. incur debt;
- iii. make financial guarantees; or
- iv. incur any other financial obligation.

e. Freedom of Movement

Suppliers must ensure that workers have the right to freedom of movement without delay or hindrance or the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation.

Worker freedom of movement rights include each worker's right to leave their workplace without retaliation:

- i. at the end of each workday;
- ii. based on reasonable health and safety-related justifications; and
- iii. based on any reasonable circumstances, such as personal or family emergencies.

f. Freedom to Terminate Employment

Suppliers must allow workers to terminate their employment or work arrangement without restriction and without the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation.

g. Compensation and Benefits

Suppliers must compensate all workers with wages, including overtime premiums, and benefits that at a minimum meet the higher of:

- i. the minimum wage and benefits established by applicable law;
- ii. collective agreements;

- iii. industry standards; and
- iv. an amount sufficient to cover basic living requirements.

Suppliers must make wage payments at least on a monthly basis and provide benefits on a timely basis.

These obligations on Suppliers to compensate and provide benefits apply to all workers at all times, including during periods of training, apprenticeship, and probation.

h. Documentation

Suppliers must:

- i. ensure that proof of payment is accurate, is clearly calculated, and enables workers to quickly verify the amount of payment and method of calculation; and
- ii. maintain proper documentation of wage payments for their internal records.

i. Deductions

Suppliers must not make any deductions from wages, except income tax withholding and those that are legally allowed.

j. Work Hours

Suppliers must not require or allow workers to work hours in excess of the maximum legally permitted number of hours set by relevant local and national laws and regulations. Additional overtime hours must be voluntary, and must not exceed the maximum legally permitted number of overtime hours worked per week. Suppliers must allow workers to take reasonable lunch breaks and reasonable rest breaks, including bathroom breaks. Suppliers must permit workers to take at least one regularly scheduled day off per seven-day schedule and permit workers to take paid or unpaid leave as allowed by law.

k. No Discrimination, Abuse, or Harassment

Our employees, those of our suppliers, and service users have the right to respectful treatment. boxxe will not tolerate discrimination, harassment or victimisation in the workplace or in connection with any service. We expect our suppliers to provide the same commitment to their own employees. The Equality Act 2010 protects against discrimination, harassment and victimisation and suppliers must not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, colour, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job.

Suppliers shall treat workers with respect and dignity.

Suppliers must not subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment. Suppliers must not condone or tolerate such behavior by their partners, agents and/or own subcontractors.

I. Zero Tolerance Policy on Sexual Harassment

As part of our commitment to fostering a safe, inclusive and respectful workplace, we uphold the principles of the Worker Protection (Amendment of the Equality Act 2010) Act 2023, particularly in relation to the prevention and strict prohibition of sexual harassment.

We operate a strict zero-tolerance policy against sexual harassment, and we expect our suppliers and their employees, subcontractors, and agents to uphold the highest standards of professional conduct, free from any form of harassment, including sexual harassment. This means that any form of unwanted behaviour of a sexual nature, including gestures, comments, advances, or any conduct that creates a hostile or offensive work environment, will not be tolerated.

All reported incidents will be treated with the upmost seriousness and handled in a professional, respectful and prompt manner in line with our Sexual Harassment Prevention policy.

We thank our suppliers for their commitment to these principles and for ensuring their workplaces reflect our shared values of respect, safety, and integrity.

m. Freedom of Association and Collective Bargaining

Suppliers must respect, and must not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

In addition to the above, Suppliers must not:

- i. take any action to prevent or suppress the workers' exercise of freedom of association or collective bargaining rights;
- ii. discriminate or retaliate against, or discipline or punish, any worker who supports or exercises freedom of association or collective bargaining rights;
- iii. discriminate or retaliate against, or discipline or punish, any worker who raises collective bargaining compliance issues; or
- iv. discriminate or retaliate against, or discipline or punish, any worker based on union membership or the worker's decision to join or not join a union.

2. Business Practices

a. Risk Management

Suppliers should be prepared to share information of its supply chain risks, so that material commercial and operational risks can be mitigated. We expect risks to be notified to boxxe in a transparent and timely manner. We require suppliers of critical services to develop resolution plans, deployable in the event of a corporate insolvency to ensure that critical services continue.

boxxe's has a robust supplier selection and onboarding process, which is designed to ensure that it only works with Tier 1 suppliers or reputable distributors who share our commitment to quality, authenticity, and ethical business practices. As such, we expect our suppliers to share our dedication to upholding quality and ethical principles to have firm principles against counterfeit goods and the use of conflict materials. boxxe's supplier onboarding process is designed to mitigate the risk of counterfeit goods or items with components of conflict materials, safeguard the interests of our customers, adhere to applicable legislation as well as raising

awareness amongst our workforce and encouraging customers to report suspicions. boxxe expects its suppliers to share its values in prohibiting any form of engagement with counterfeit or conflict commodities. Please see our Supply Chain & Procurement Policy for further details.

b. Continuous Improvement

We expect suppliers to use recognised industry practices in the delivery of goods and services and to continuously improve these goods and services during the life of a contract and where appropriate we will inform suppliers of our innovation requirements during any procurement processes.

c. Confidentiality

Suppliers are expected to comply with the provisions in our contracts and any legal requirements to protect commercial and sensitive information. Suppliers may be party to confidential information that is necessary to be effective partners. This information, even if it is not covered by contractual provisions, should be handled with the same care as information of similar sensitivity.

d. Conflicts of Interest

We expect suppliers to mitigate appropriately against any real, potential or perceived conflict of interest through their work.

3. Health and Safety

Suppliers are required provide a safe, healthy, and sanitary working environment. Suppliers must implement procedures and safeguards to prevent workplace hazards, and work-related accidents and injuries, including procedures and safeguards to prevent industry-specific workplace hazards and work-related accidents and injuries. General and industry-specific procedures and safeguards include those relating to health and safety inspections, equipment maintenance, maintenance of all business premises, worker training covering the hazards typically encountered in their scope of work, fire prevention and documentation and recordkeeping.

Suppliers must provide workers adequate and appropriate personal protective equipment to protect workers against hazards typically encountered in the scope of work.

Suppliers are expected to have a legally compliant health and safety policy in place and will provide a copy to boxxe on request at any time during the supplier's engagement with boxxe.

4. Environmental Protection

Suppliers should ensure that they are environmentally conscious, including by taking proactive measures to avoid environmental harm such as by minimising or eliminating waste, encouraging recycling and re-using materials.

Suppliers must operate all of their business premises in compliance with all environmental laws, including laws and international treaties relating to waste disposal, emissions, discharges and hazardous and toxic material handling.

Suppliers must ensure that any goods that they manufacture (including the inputs and components that it incorporates into its goods) comply with all environmental laws and treaties. Suppliers must ensure that they only use packaging materials that comply with all environmental laws and treaties.

Copies of any applicable environmental policies should be shared with boxxe upon request.

5. Gifts and Entertainment

Boxxe takes its compliance with anti-bribery and anti-corruption laws very seriously and requires all employees to abide by its Gifts & Entertainment Policy. Suppliers must maintain the highest ethical standards and not engage in any corrupt practices. Suppliers must comply with all applicable anti-bribery and anti-corruption laws and regulations, including the Bribery Act 2010.

Suppliers must not offer cash, favours, gifts, or entertainment to boxxe's team members. Vendor funded events/entertaining should be disclosed.

6. Report Violations

Suppliers must self-report any violations of this Code of Conduct to boxxe by e-mailing suppliermanagement@boxxe.com or legal@boxxe.com. Suppliers can also submit questions and comments regarding this Code of Conduct to suppliermanagement@boxxe.com.

If you would like to report any concerns confidentially and anonymously you can do so via our secure whistleblowing platform, [Your Voice](#).

Suppliers must not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behavior, or who has sought advice regarding this Code of Conduct.

7. Compliance with Laws

Suppliers must comply with all applicable national and local laws and regulations, including (but not limited to) the Bribery Act 2010 and the Modern Slavery Act 2015. Where this Code of Conduct requires Suppliers to meet a higher standard than set out by law or regulation, suppliers must meet such higher standards.

Suppliers agree that boxxe may in its discretion conduct inspections of their business premises to confirm a supplier's compliance with this Code of Conduct.

8. Termination

boxxe may immediately terminate its business relationship (including any purchase order(s) and purchase contracts) with any supplier if that supplier fail to comply with this Code of Conduct.