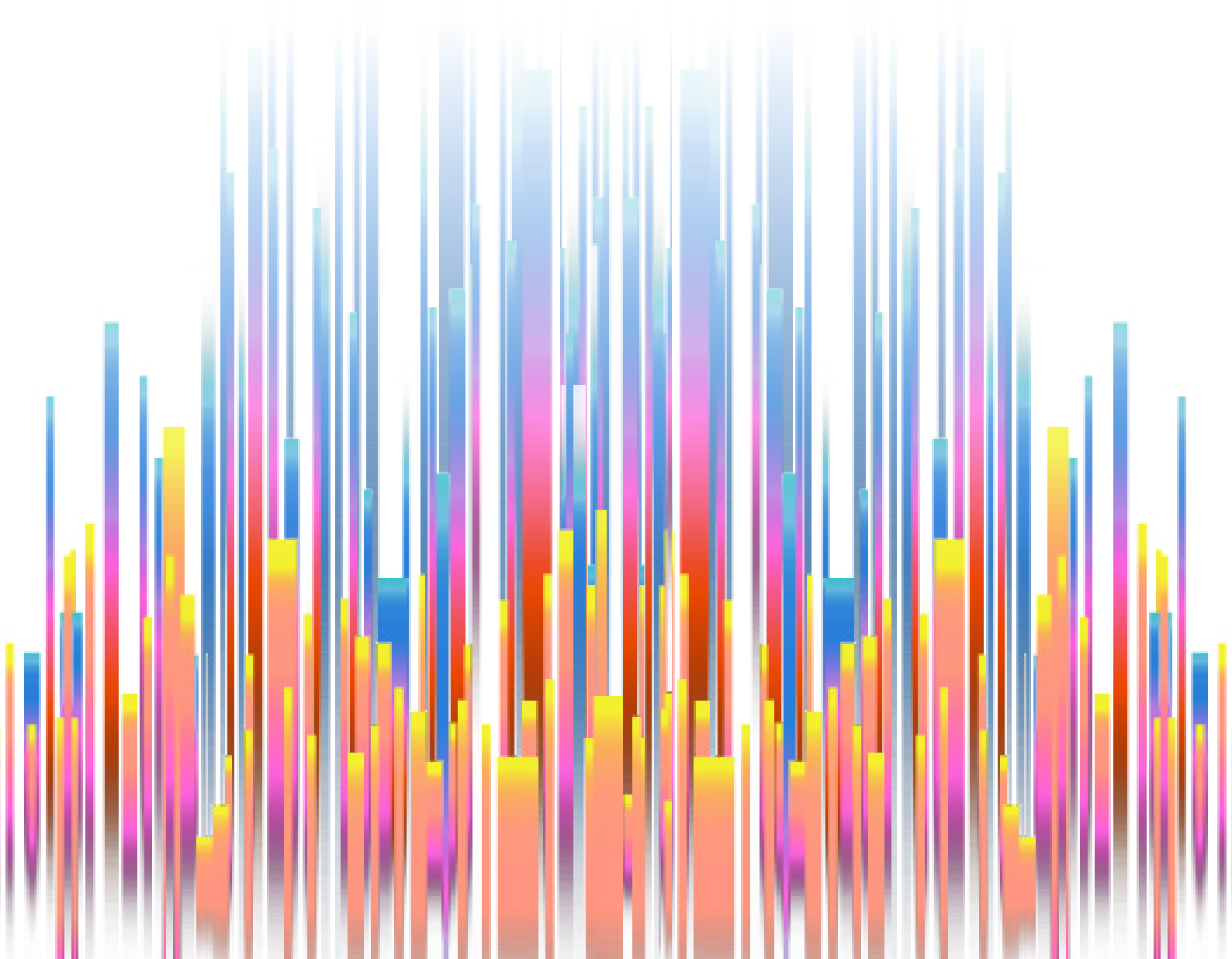




Supplier Code of Conduct

The Barcode Warehouse Limited is committed to ensuring that its supply chain acts in accordance with the law, ethical standards and in a fair and transparent manner at all times. Therefore, we have created this Supplier Code of Conduct which sets out our minimum expectations of how our Suppliers and other entities within our supply chain should act and operate when doing business with us and in their general day-to-day activities.



BARCODE WAREHOUSE



WHAT IS THE SUPPLIER CODE OF CONDUCT AND WHO DOES IT APPLY TO?

The Supplier Code of Conduct sets out The Barcode Warehouse Limited's expectations and minimum requirements in relation to the conduct, behaviour and standards of all Suppliers who work with us directly and/or indirectly.

It explains our requirements regarding ethical and legal standards, and we consider them to be universally applicable to our supply chain and as such, must apply to all our business activities with suppliers and all entities within our supply chain.

This Supplier Code of Conduct applies to all Suppliers, Subcontractors, Consultants and any other entity who form part of our supply chain. The Supplier shall ensure that it implements standards equivalent to those set out in this Supplier Code of Conduct to all entities within its supply chain by way of contractual obligations. These entities and any such entities forming part of their supply chain shall be collectively referred to as the "Supplier" throughout this Supplier Code of Conduct.

Suppliers are wholly responsible for compliance with, and application of the principals of this Supplier Code of Conduct whilst undertaking its day-to-day activities, in particular during any business dealings with The Barcode Warehouse Limited and must also be able to demonstrate that they are doing so when required by The Barcode Warehouse Limited.

Where there is a non-compliance with this Supplier Code of Conduct by the Supplier, we will work with them to support any necessary improvements, but we will also take action, which may involve cancelling contracts and ceasing to trade, if suppliers are not prepared to make appropriate changes.

SUPPLIER OBLIGATIONS UNDER THE SUPPLIER CODE OF CONDUCT

Compliance with Applicable Laws

The Supplier shall comply, and shall ensure compliance throughout their supply chain, with all laws applicable to its business and shall provide all Goods, Software, Services and anything else it may supply to The Barcode Warehouse Limited, in accordance with the same.

The Supplier shall ensure that all Goods, Software, Services and anything else it may supply to The Barcode Warehouse Limited is produced and provided in conformity with the United Nations Charter, Chapter IX: International Economic and Social Cooperation (Articles 55-60) | United Nations, with specific reference to workers' rights and working conditions and comply with the Core Conventions of the International Labour Organization (ILO).

Your People

Human Rights

The Barcode Warehouse aims to ensure that our approach to human rights is in line with international agreements and guidelines including the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights of Work.

The Supplier shall respect the human rights of its workers and any workers in its supply chain and shall ensure that it acts in accordance with such guidelines and regulations relating to Human Rights.

Child Labour

The Supplier shall not employ any children under the legal age of employment in any country or local jurisdiction and in any event, no younger than 15 years old, even where local legislation permits younger children to be employed. Workers under the age of 18 shall only perform work in accordance with relevant legal requirements of their country of employment (e.g. with regards to working time and working conditions) and subject to any requirement regarding education or training.



Modern Slavery

The Barcode Warehouse Limited has a zero tolerance to any form of Modern Slavery or exploitation of people in the workforce and as such, expect Suppliers to uphold such principles and act in accordance with relevant legislation including, but not limited to, the Modern Slavery Act 2015 and the ILO Declaration on Fundamental Principles and Right to Work and take action to identify, prevent and mitigate modern slavery in their operations and supply chains.

The Supplier shall not use any form of forced, bonded, compulsory labour or any modern form of slavery; all labour must be voluntary.

The Supplier shall publish an annual modern slavery statement on a yearly basis, if a Supplier is obliged to do so in accordance with relevant legislation.

Compensation & Working Hours

The Supplier shall comply with all applicable local legislation and mandatory industry standards regarding working hours, including overtime, rest breaks and paid holiday.

The Supplier shall compensate its workers in accordance with local minimum wage legislation and terms of applicable collective bargaining agreements as well as with industry standards.

The Supplier shall set out the terms of employment with all workers in clear, unequivocal language which the relevant workers understand, which shall include obligations upon the Supplier to pay their workers in a timely manner as set out therein without deductions, such as deductions as a disciplinary measure, if not legally permitted.

Freedom of Association & Collective Bargaining

The Supplier accepts and acknowledges their employees right to collective bargaining in accordance with any legislation in the jurisdiction which the Supplier resides and shall ensure that its employees will be free to join or not to join any such union/employee representation of their choice, free from threat or intimidation.

Diversity & Inclusion in the Workplace

The Barcode Warehouse Limited is an equal opportunities employer and does not tolerate any form of discrimination of our employees. We ensure that our employees are treated with dignity and respect and seek to ensure that no person is victimised or subjected to any form of bullying or harassment and do not tolerate any form of physical or verbal abuse, harassment, threat or intimidation. This applies to all areas of employment including recruitment, selection, training, deployment, career development, and promotion.

The Supplier shall ensure that it applies these principles and shall treat all employees and any person it deals with in an inclusive and fair manner and shall promote an inclusive work environment that values the diversity of its employees.

The Supplier shall be committed to equal opportunities and not discriminate or tolerate discrimination or harassment with respect to gender, ethnic and national origin, race, color, religion, age, disability, sexual orientation and identity, or any other characteristic protected by law.

The Supplier shall implement a policy and a system of training for their employees, suppliers, and subcontractors and implement approaches to ensure hidden discrimination does not take place in hiring, compensation, access to training, promotion, and termination of employment or retirement to ensure compliance with relevant legislation and shall keep a record of all such training offered and completed by their employees, suppliers, and subcontractors.

BARCODE

WAREHOUSE



Health & Safety

The health, safety and wellbeing of our people has always been our main priority. We are committed to excellent management of our work environment and the continuous improvement of controls to provide for the health and safety of not only our employees, but also our visitors, contractors and our community as a whole.

The Supplier shall apply a health and safety management approach appropriate to its business and provide its employees and any visitors, with an appropriate, adequate, safe and hygienic working environment which meets their basic needs and is conducive to good health, in order to preserve and promote the health and safety of the Supplier's employees and any such visitors, in accordance with the Health & Safety at Work Act 1974 and any other applicable local legislation, bearing in mind the prevailing knowledge of the industry in which they undertake their day to day business activities and of any specific hazards in the same, so as to minimise accidents, injuries and work-related illnesses.

The Supplier shall undertake regular workplace risk assessments in its day-to-day operations, to ensure safe methods of work and shall ensure that the outcome of such risk assessments are implemented by their employees at all times, including but not limited to the implementation of adequate hazard control and precautionary measures, and the provision of appropriate and adequate personal protective equipment (PPE) and health monitoring.

The Supplier shall ensure that its employees and any visitors to their premises are adequately educated and trained in health and safety issues in a language and format they understand.

The Supplier, where able, shall give consideration to working conditions to promote work-life balance, training and personal development of colleagues.

Insurance

The Supplier shall maintain adequate insurance policies commensurate with the scope and type of industry in which they undertake their primary business activities and in accordance with local legislation.

The Supplier shall provide copies of any insurance certification upon request of The Barcode Warehouse Limited.

Ethical Business Behaviour

The Supplier warrants that itself as an entity, its beneficial owner(s), any of its agents, any of its subsidiaries, or any other subcontractors or suppliers are not based in, connected or affiliated with any entity based within any country under any sanctions of the United Nations, UK Government or European Union as amended from time to time.

Anti Bribery

We are committed to the highest standards of ethical conduct and integrity in our business activities in the UK and overseas and expect our suppliers to join us in this. We act in accordance with our Ethical Policy and all applicable anti-bribery legislation. We will not tolerate corruption, bribery, fraud, or anti-competitive practices.

The Supplier is expected to compete on the merits of their products and services and the exchange of business courtesies may not be used to gain an unfair competitive advantage. The Supplier shall comply with all applicable national and international anti-corruption laws and regulations, including but not limited to the Bribery Act 2010. The Supplier shall not (either directly or indirectly) offer, provide or accept anything of value to improperly influence an official act or to secure an improper advantage in order to obtain or retain business. This includes so-called facilitation payments or other benefits provided to public officials for routine non-discretionary actions.

The Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organisation and are consistent with reasonable marketplace customs and practices.

BARCODE

WAREHOUSE



Trade Regulation, Anti-Competition and Illegal Payments

The Supplier shall comply with all applicable export control, sanctions and customs laws and regulations, including Prohibitions & Restrictions ("Trade Laws"). The Supplier in particular ensures that the Supplier, its beneficial owner(s), all its agents and any other subcontractors used by the Supplier are not listed on any applicable Denied Party sanctions lists. Suppliers shall act in accordance with any and all anti-competition and anti-trust laws and regulations within its locality and good industry practice in its day-to-day activities. The Supplier shall not co-operate or collude with their competitors or other entities in order to fix prices or bids in an effort to circumvent any competitive process or exchange current, recent, or future pricing information with competitors. Suppliers shall not become or participate within a cartel.

The Suppliers shall not offer any illegal payments to, or receive any illegal payments from any customer, supplier, their agents, representatives or entities at any time, even in any location where such activity would not breach any local laws.

Fraud and Deception

The Supplier shall ensure it always acts in a truthful and transparent manner during its business with The Barcode Warehouse Limited and others and shall not seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so.

Conflict of Interest

A conflict of interest is any personal or financial interest, any business or personal activity or relationship, prior or current employment, or any obligation that may interfere with the ability to objectively perform job duties and responsibilities or impair independence and objectivity.

The Supplier is expected to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. The Supplier is expected and shall provide notification to all affected parties in the event that an actual or potential conflict of interest arises.

Whistleblowing

The Supplier shall ensure that it has policies enabling its employees, contractors, consultants, officers or otherwise to raise concerns relating to something at their workplace which they believe is dangerous, unethical, unprofessional or criminal in their nature, without the fear of reproach and a process in undertaking investigations following such concerns being raised whilst protecting such concerned persons.

Money Laundering & Financial Records

The Supplier shall comply with applicable laws and regulations designed to combat money laundering activities and shall keep such financial records and details of its efforts to do so, according to applicable laws and regulations.

Your Products & Day to Day Activities

UK REACH

The Supplier shall comply with any applicable obligations in relation to UK and EU REACH regulations and shall ensure that any goods sold to The Barcode Warehouse Limited do not contain any substances that appear on the relevant Candidate List in a concentration above 0.1% weight by weight (w/w). If the Supplier's goods contain a substance that appears on the Candidate List in a concentration above 0.1% weight by weight (w/w) the Supplier shall notify The Barcode Warehouse Limited immediately, before shipping the Goods in question, and must be able to provide sufficient information to allow safe use of the article including, as a minimum, the name of the substance.



Conflict Minerals

The Supplier shall comply with all applicable laws, including any applicable Conflict Minerals Regulations and resulting due diligence obligations with respect to the sourcing of minerals and materials from conflict affected regions and high-risk areas, which may contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects and shall ensure that it has in place adequate reporting and procedures to prevent the use of conflict minerals (as defined in the Conflict Minerals Regulations) in its products.

Your Environmental Impact

The Supplier shall take environmental and climate protection appropriately into account in their day-to-day activities and shall at all times, comply with all applicable environmental laws, regulations and standards. We expect our suppliers to implement systems to identify and eliminate potential hazards to the environment caused or made worse by their business.

The Supplier shall provide relevant data on the Supplier's efforts to reduce environmental hazards and climate protection as and when requested by The Barcode Warehouse Limited

The Barcode Warehouse Limited encourages its Suppliers to look for opportunities to go beyond regulatory compliance obligations and make progress towards integrating sustainable practices throughout their operations and look for ways to minimise the impact on the environment (including but not limited to the use of energy, greenhouse gas emissions, hazardous materials, logistics, manufacture and production methods, and recycling options) through their day-to-day activities.

Interaction with TBW and TBW customers

All Suppliers are required to act and interact with respect and in good faith with employees of The Barcode Warehouse Limited and their Customers at all times.

When attending any premises of The Barcode Warehouse Limited or its Customers, the Supplier shall ensure that it complies with any policies or reasonable instructions of The Barcode Warehouse Limited or its Customer, as applicable and shall, where necessary, undertake any site induction or completion of Risk Assessments and Method Statements relating to their work on the site.

Data Protection

Whenever the Supplier deals with any information or data of The Barcode Warehouse Limited or its Customers, including personal data of customers, consumers, employees and shareholders, the Supplier shall act in accordance with data protection legislation and regulations, including but not limited to UK GDPR, GDPR (where applicable) and the Data Protection Act 2018.

The Supplier shall comply with all said requirements and any contractual obligations entered into relevant contracts with The Barcode Warehouse Limited incorporating relevant obligations and/or information security requirements, when any such personal data is collected, recorded, hosted, stored, processed, transmitted, used or erased.

Any personal data handled by Suppliers will be processed only on behalf of and in accordance with instructions from The Barcode Warehouse Limited or their Customer, where applicable, and Suppliers are not permitted to use personal data on their own behalf or on behalf of a third party nor communicate them to a third party without the prior authorisation of The Barcode Warehouse Limited or their Customer, where applicable.

The Supplier shall ensure the adequate treatment of sensitive information, including confidential information and data covered by intellectual property rights.

The Barcode Warehouse Limited may require additional security measures to be undertaken or certification to reflect higher requirements for certain projects and the Supplier shall ensure it complies with any such additional security measures as and when required, in accordance with relevant contractual provisions.



Compliance & Audits

The Supplier shall ensure that its employees, subcontractors, consultants, suppliers and any other person or entity under its control or forming part of its supply chain who are performing services, or providing goods, in connection with its dealings with The Barcode Warehouse Limited, accept and understand their relevant obligations under this Supplier Code of Conduct and shall comply with the same and shall reduce such obligations down to writing to ensure such compliance, where necessary.

The Barcode Warehouse Limited requires regular certification of compliance of this Supplier Code of Conduct and reserves the right to check compliance with the requirements of this this Supplier Code of Conduct by way of an audit or similar by The Barcode Warehouse Limited or by a third party acting on their behalf, upon the giving of reasonable notice to the Supplier.

In the event that a breach of this Supplier Code of Conduct by the Supplier is identified during any such audit or otherwise, The Barcode Warehouse Limited may work with the Supplier to create an improvement plan to ensure compliance with the Supplier Code of Conduct.

However, notwithstanding the above, dependant on the nature and seriousness of such a breach, The Barcode Warehouse Limited reserves the right to determine that any such breach constitutes a material breach of our trading relationship and may result in the immediate termination of any trading with the Supplier, including the termination of any letter of intention, orders, or any form of contract between The Barcode Warehouse Limited and the Supplier. Where illegal activity is identified, this will result in the appropriate authorities being informed and full disclosure made without notice to the Supplier.