

Human Capital & Culture

Supplier Code of Conduct

Purpose

The purpose of this policy is to set clear ethical, social, environmental, and operational expectations for all suppliers, contractors, and business partners working with B&S Investments. As a Saudi-rooted, globally ambitious holding group, B&S Investments engages with a wide range of third parties across sectors including exhibitions, manufacturing, hospitality, tourism, creative content, and digital ventures. This Supplier Code of Conduct defines the minimum standards suppliers must meet to build ethical, responsible, and mutually beneficial relationships.

Scope

This Code applies to all suppliers, vendors, service providers, agents, consultants, and contractors—whether local or international—that conduct business with B&S Investments or any of its subsidiaries. It covers entities involved in:

- Supplying goods, materials, or services
- Operating under outsourcing, subcontracting, or distribution arrangements
- Representing the Group in legal, commercial, or branding matters
- Participating in joint ventures or public-private partnerships
- Suppliers are expected to extend these principles to their own supply chains.

Policy Statement

B&S Investments is committed to conducting business with integrity, transparency, and accountability. The Group expects its suppliers to uphold high standards in labor practices, environmental stewardship, legal compliance, and ethical business conduct. All suppliers must comply with this Code as a condition for doing business with the Group.

Roles & Responsibilities

Role	Responsibility
Chief Procurement Officer	Ensure supplier policies and contracts incorporate this Code
Procurement Team	Assess suppliers for compliance, manage onboarding and renewal processes
Compliance & Risk Management	Oversee due diligence, conduct audits, and handle breaches or escalations
Sustainability & ESG Team	Monitor environmental and social practices of key suppliers
Suppliers	Adhere to all standards in the Code, provide documentation, and report violations

Procedures & Implementation

1. Legal & Regulatory Compliance

- Suppliers must comply with all applicable local, national, and international laws, including those related to:
- Trade regulations and anti-bribery laws
- Import/export controls and customs requirements
- Tax compliance and financial reporting
- Fair competition and anti-trust laws

2. Labor & Human Rights

- Suppliers must uphold the rights and dignity of workers, including:

- No forced, bonded, or child labor (minimum age: 18 or as permitted by law)
- Fair wages, benefits, and working hours aligned with local standards
- Freedom of association and collective bargaining
- Safe, clean, and harassment-free workplaces
- Non-discrimination based on gender, religion, nationality, disability, or ethnicity

3. Environmental Responsibility

- Suppliers are expected to minimize environmental impact and support sustainability, including:
- Efficient use of resources (energy, water, raw materials)
- Proper handling and disposal of hazardous waste
- Emissions reduction and air/water pollution control
- Compliance with environmental laws and certifications (e.g., ISO 14001)
- Support for circular economy initiatives (recycling, reuse, renewable materials)

4. Ethical Business Conduct

- Suppliers must operate with integrity and honesty by:
- Prohibiting corruption, bribery, and facilitation payments
- Avoiding conflicts of interest in any dealings with B&S employees
- Protecting confidential information and intellectual property
- Disclosing any potential violations or unethical behavior
- Ensuring transparency in financial and operational reporting

5. Health & Safety

- Suppliers must:
- Provide a safe and hygienic work environment
- Implement safety protocols, training, and protective equipment
- Comply with all occupational health and safety regulations
- Maintain emergency response plans and incident reporting mechanisms

6. Diversity, Inclusion & Local Development

- Actively support workforce diversity and inclusion
- Promote local hiring and community development

- Engage with SMEs and women-owned businesses where feasible

7. Monitoring, Audit & Transparency

- B&S Investments reserves the right to audit suppliers (announced or unannounced)
- Suppliers must maintain documentation demonstrating compliance with this Code
- Any misrepresentation, refusal to cooperate, or significant non-compliance may lead to contract suspension or termination

8. Reporting Misconduct

- Suppliers must report violations or unethical practices through the Group's confidential whistleblower channel. Retaliation against whistleblowers is strictly prohibited.

Monitoring & Review

The Procurement and Compliance teams will monitor adherence through:

- Pre-qualification screening and risk scoring
- Regular compliance reviews and site inspections
- Third-party ESG assessments for high-impact suppliers
- Corrective Action Plans (CAPs) for non-compliance

The Code will be reviewed annually and updated to reflect evolving legal requirements, ESG benchmarks, and global best practices.

Associated Documents

- Supplier Due Diligence Checklist
- Supplier Pre-Qualification Form
- Anti-Fraud & Anti-Bribery Policy
- ESG Integration & Reporting Policy
- Procurement & Vendor Management Policy
- Whistleblower Protection Policy
- Local Content & Economic Inclusion Guidelines
- Supplier Self-Audit Toolkit
- Corrective Action Plan Template
- Third-Party Risk Assessment Matrix