



# 2024 Sustainability Statement

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# Corporate Sustainability Statement

For 40 years, we have worked with customers in every corner of the globe, helping build meaningful connections between consumers and brands. These connections help bring brands to life across both physical merchandise and digital experiences. We are actively involved at every step of the omnichannel merchandise brand journey, from ideation and design to global sourcing, manufacturing, logistics and fulfilment. We help client brands create connections that stand the test of time, and believe in the power of merchandise and its role as an advertising medium for impact. We are passionate about using this timeless connection to expand a customer's reach and presence, delivering a lifetime of branded impressions.

Throughout our history, we have committed to making an impression and a positive impact in every community we serve. This commitment means acknowledging that creating an environmentally friendly and socially responsible workplace is as important as partnering with clients and suppliers who share our goal to give back and operate responsibly. While we have been environmentally aware and implemented numerous measures to be a responsible company throughout our nearly four decades in business, we realise there is much more to do to protect the planet and the communities in which we live, work, and serve.

In addition to establishing measurable and actionable steps across all our global business offices to reduce our impact on the planet, we are also exercising influence with our manufacturing and supplier partners to hold us all accountable for becoming better environmental stewards. We are motivated to source eco-friendly merchandise options for our clients and proactively reduce our carbon footprint. Whether it is a need for biodegradable packaging, antibacterial products, reclaimed or reusable products, or apparel made from renewable and recycled fabrics or certified as Fairtrade, we want to enable brands to exercise their commitment to the environment and comprehensive sustainability. It is not enough to hope that what we enjoy today will be here tomorrow. We must proceed with the intention to understand and acknowledge how our work impacts the environments in which we operate. Together we can create solutions in the areas we impact. That is why we are committed to pushing our corporate social responsibility through benchmarking, measuring our greenhouse gas (GHG) emissions, developing internal and external sustainable business solutions and manifesting a positive impact on our communities through respect and responsible action.

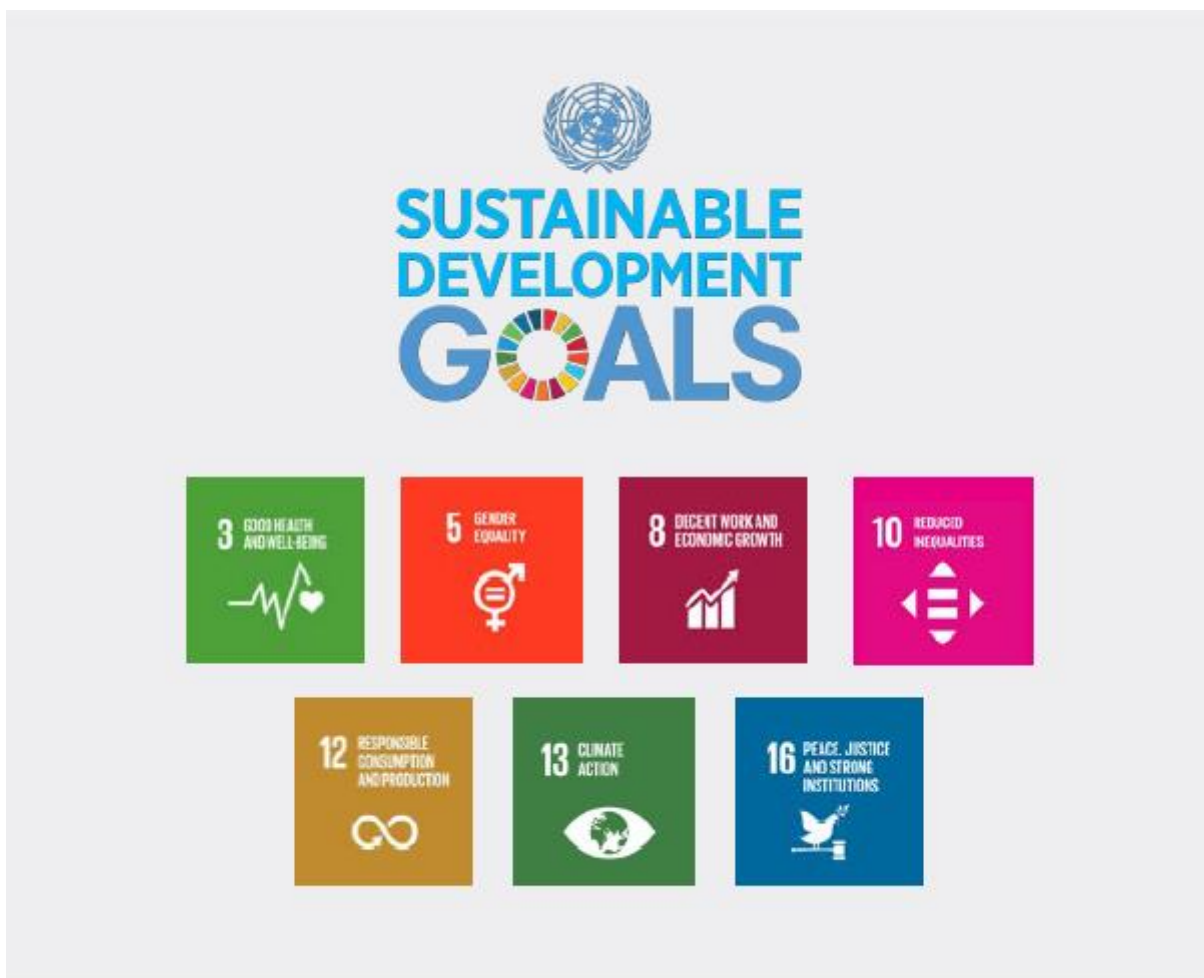
We are members of the British Promotional Merchandise Association. As part of our sustainability efforts we have committed to the BPMA StepForward Pledge. Our pledge is publicly available on the BPMA website <https://www.bpma.co.uk/Organization?ID=1057>.

This report is the culmination of the work we have done to develop our sustainability strategy. It is a result of our materiality assessment on sustainability issues relating to economic, environmental and social issues. We conducted the materiality assessment to establish the key areas to focus our strategy on. We consulted internal and external stakeholders as well as third party experts to determine the topics to be addressed. Employees at all levels of the business were invited to input into our assessment, as well as key suppliers.

# United Nations Sustainable Development Goals

The 17 Sustainable Development Goals created by the United Nations are the pathway which leads to a better future for all. They address the global challenges we face and are all interconnected. They recognise that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality and promote economic growth – at the same time as addressing climate change and taking actions to preserve our planet.

Following a materiality assessment, BDA has created its sustainability strategy around the Sustainable Development Goals. We have selected the 7 goals that we can focus on to take positive steps towards.

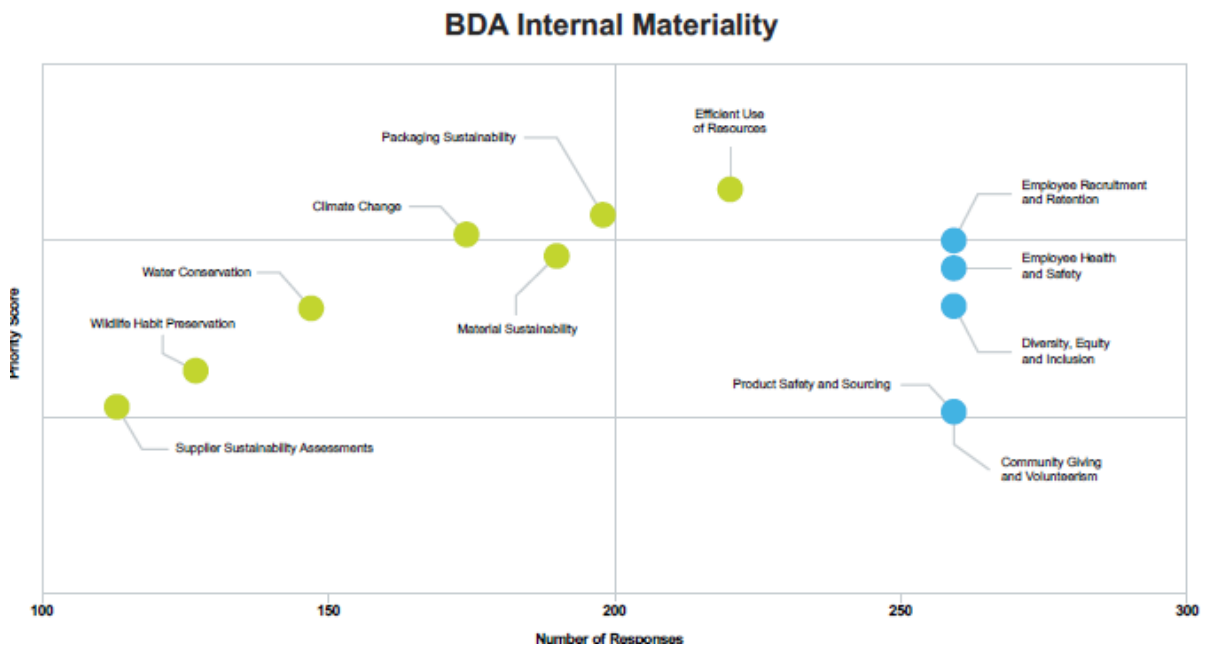


# Materiality Assessment

In 2022, we conducted a materiality assessment to understand what ESG topics were important to our internal stakeholders. These results informed our sustainability goals and commitments laid out in our ESG Roadmap.

## ESG Roadmap

Our ESG roadmap includes objectives across each ESG area and is designed to help BDA integrate sustainability into everyday business decisions as we make progress against our ESG goals. This roadmap will help ensure that we remain focused on our sustainability goals, continually work towards reducing our environmental impact, and support all stakeholders through our business practices.





A successful, sustainable business is built on a healthy workforce. A business that prioritises the well-being of its staff will benefit from increased productivity, reduced absenteeism and a motivated team. It is important for companies to ensure that both the physical and mental health of staff is considered.

If a business develops the skills of all employees, regardless of gender or background, it will have a more capable workforce and will increase its chances of being able to promote internal, experienced staff. If it seeks job applications across the entire market, it will have more suitable candidates to choose from and more success at hiring externally.

A business that offers a positive working experience with job satisfaction will attract good workers who are motivated to help the organisation succeed. Economic success is more likely to follow with further benefits that can be passed on to staff including opportunities to progress within the company. Promoting decent work opportunities within a supply chain, through auditing and capacity building, can help partner businesses succeed and grow together.

An ethical business not only wants to make correct moral decisions for the benefit of its own employees and suppliers, but it should also seek to do the right thing for its wider community in all circumstances. Having the right policies, procedures and internal controls in place will help an organisation maintain healthy relationships with all of its stakeholders. Sustainable businesses need a corruption-free environment to achieve ongoing, stable economic success.



**Current Overview**

We recognize that employee well-being and engagement are critical to the success of BDA. Helping to guide our experience, in December 2022 we published and rolled-out our four Employee Tenants. These Employee Tenants were personally developed by our CEO, which guide BDA’s approach to employee engagement, satisfaction and well-being.

Our Leadership Team has been tasked to roll these tenants out to their teams, and all people managers are trained against helping to drive these tenants to ensure a positive and engaging employee experience.

To further support well-being for our associates, BDA has provided all employees unlimited access to two mental well-being apps: Headspace, which offers content designed to improve sleep, mindfulness, and overall well-being, and Ginger, which provides access to self-care, mental health coaches, and private video sessions with a therapist or psychiatrist. We also held an employee day to offer free health screenings and wellness education. In addition, employees at all levels of the business receive Certificates of Investment, which tie company performance to financial rewards for staff.



Emphasising employee well-being and engagement has helped create a positive work environment and motivated workforce, which drives our company's success. Throughout 2023, we are continuing to focus on our associates and prioritise their experience, growth, and well-being.

In 2023 We implemented a health and safety management system and gained ISO 45001 certification to cover all of our operations.

We have recently updated a new Internal Human Rights Policy to strengthen our commitment to the wellbeing of our employees. We have also continued our partnership with Qualtrics, one of the world’s leading survey companies, to run an employee experience survey that covers all areas related to a positive workplace including management, communication and opportunity for growth.

**2023 Data**

Number of accidents or injuries at work	0
Number of working days lost to injuries at work	0
Days lost to injuries, fatalities or ill health at work	0
Percentage of employees offered health care benefits	100%
Percentage of employees receiving support with eye care	100%
Percentage of employees receiving other benefits	100%
Number of employees trained on health and safety	33
Total working hours	51405
Number of days lost to absenteeism and sickness	19



### **Current Overview**

We are committed to reflecting the diversity of the communities where we work and live, and feel a sense of responsibility to give back to them through inclusion and support. We want to be a force for good, in the important fight for equality, inclusivity and justice. We strive to create a culture and work environment that provides all employees equal access to information, career development and opportunity.

To do this, we are building a culture that embraces equal representation. We believe that everyone should be heard, and the best ideas come when everyone is encouraged to give them. We also feel responsible and believe in our ability and position; to influence and help champion equal representation, and to select partners who share our commitment to diversity and inclusion.

A culture built on equality and empowerment brings us closer to our employees, vendors and customers, fuelling innovative ideas, and unique experiences, and reinforces the spirit of continuous improvement.

Last year we conducted a pay review of all employees globally. The ultimate result of the market analysis of compensation, prior to pay adjustments, determined that no woman is paid less than a man for a comparable position – a result we are proud to report.

### **Recruiting**

We also have a focus on equality of workers from all backgrounds and communities. BDA targets its recruitment outreach efforts to organisations that support underrepresented job seekers. Our goal is to broaden our candidate reach by forming authentic, meaningful relationships with diverse communities. To do this, we use a variety of tools including job fairs, professional networking events, diversity job boarding postings as well as participating in mentorship and internship programs.



### **DEI Technology and Data**

BDA has invested in technology to accelerate, manage, and measure our DEI impact. Mathison software allows us to craft inclusive job descriptions as well as create a deliberate interview process to reduce the organisation's susceptibility to bias. It also includes regular training for hiring managers as well as contains a library of interview questions. This tool allows the talent acquisition team to directly source from underrepresented communities.

We also use the Mathison software to support the training of our staff on subjects such as unconscious bias and harassment.

On our approved supplier list we track whether a business is owned by a female or someone from a minority group. This data helps us understand what steps we need to take to grow our supplier base with minority/female-owned businesses.



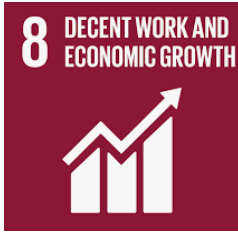
## Belonging Groups

One of our proudest accomplishments in 2023 in moving forward our DEI efforts was the establishment of our Associate Belonging Groups, which exist to support communities of employees with shared lived experiences and identities. These groups arose from Associate surveying and soliciting feedback about what groups our people wanted to form, lead, and drive representation for. The groups focus on creating a space where everyone feels comfortable and welcomed for their authentic selves, promoting an environment of acceptance and inclusivity through education, mentorship, organizational policy influence, and community engagement. They are employee-led with support from leadership sponsors and backing from our CEO.



## 2023 Data

Number of employees	31
Number of new employees	2
Percentage of permanent employees	100%
Number of full-time employees	30
Number of part-time employees	1
Percentage of females employed	52%
Percentage of women in senior management	50%
Percentage of minority workers	22%
Percentage of minority workers in senior management	33%
Percentage of workers with a disability	3%
Number of new starters trained on discrimination and harassment	2
Number of harassment complaints	0
Number of discrimination complaints	0
Number of whistleblowing incidents	0



**Current Overview**

BDA aims to maintain a motivated workforce by providing a positive working experience for all of our colleagues. We have modern office spaces and the latest technology to ensure a comfortable working environment that helps maximise the potential of individuals. We provide competitive salaries and incentivise workers to strive for success.

We manage business risk to ensure staff can have confidence in the stability of their employment. We champion employee well-being and engagement, as demonstrated through several initiatives. One such initiative is the market analysis of compensation for our entire global team, which ensures that employees are fairly compensated, and BDA remains competitive in the job market. This pay equity analysis was done systematically throughout the company, with HR focusing on each individual department at a time, utilising best practices and resources. When identified, pay at either the individual or overall position level was adjusted/increased to reflect fair market value, experience and pay competitiveness.

We provide Leadership Development courses for our employees to support career progressions through the business. We cover topics such as Performance Management, Fair Employment Practices and What it Means to be a Leader at BDA.

We conduct ethical audits of our suppliers' factories to ensure they are compliant with the law and our code of conduct. We support factories with capacity building on social issues to help them complete their corrective action plans for their SMETA and BSCI audit reports. Audits are updated regularly to ensure decent work for employees in our supply chain.

Our Code of Conduct requires suppliers to ensure workers are treated fairly and in line with the ETI Base Code. It forms part of our suppliers contracts. Suppliers must sign our code and any contravention of it can result in termination of contract.

**2023 Data**

Employees with a performance review and career discussions	100%
Average training hours per employee	20
Number of training courses attended	19
Number of employees belonging to trade unions	0
Percentage of employees with free association	100%
Suppliers committed to BDA Code of Conduct	100%
Supplier contracts with social and environmental clauses	100%
New suppliers completing our vetting questionnaire	100%
Suppliers with completed social and environmental audits	42
Capacity building with suppliers through corrective action follow up	32
Buyers receiving training on sustainable procurement	100%
Number of supply chain child labour incidents reported	0
Number of supply chain forced labour incidents reported	0



**Current Overview**

We believe that a business has the best chance of long-term success if it maintains healthy relationships with suppliers built on trust. We always want to do the right thing and take the morally correct decision, even if that is not the best option for short-term economic gain. Our policies provide a framework for decision-making and action-taking that keep us on the right path.

BDA’s senior leadership directly oversees our ESG program. The program has three Executive Sponsors with support from the ESG Business Partners Group, which is comprised of five Associates from the Leadership Team. Three members of the Executive Team also serve on our Diversity Council to provide support, resources, and oversight where needed.

BDA values ethical leadership and ensures strategic plans or initiatives are assessed with transparency to create a secure work environment for Associates. Our open-door policy reinforces this culture of transparency by allowing Associates access to the CEO, executives, leadership team, and all levels of management.

We reinforce ethical leadership through policies that manage business risk and prevent corruption, money laundering, and anticompetitive practices. Our Business Ethics policy covers various topics and reflects a zero-tolerance approach to unethical behaviour, including corruption, harassment, and bullying. We provide employees the necessary training and support to comply with the policies and take prompt action when necessary, including immediate investigation into allegations of harassment. We also provide anti-corruption and bribery training to maintain the integrity of our operations. Through our focus on ethical leadership, transparency, and creating a safe and supportive work environment, we carry out our commitment to being a responsible and trustworthy company.

**2023 Data**

Percentage of employees trained on ethics	100%
Number of corruption incidents reported	0
Number of whistleblowing incidents reported	0
Number of information security incidents reported	0



Responsible consumption means considering how to minimise negative environmental impact whilst sourcing products for consumers. This includes considering materials, production methods and business partners, using sustainable materials and selecting factories that have a record of good environmental practice.

It also means consideration for the welfare of everyone in the supply chain. Positive work experiences must be promoted for all individuals involved in producing and delivering goods. Workplaces need to be clean and safe, and the mental and physical well-being of staff should be prioritised.

Everyone around the world needs to take action now to tackle climate change. We need to alter our behaviours to stop climate change and rising temperatures. If businesses don't take steps now, the world and the global economy will suffer, which will make running successful sustainable businesses more difficult.



### Current Overview

BDA’S vision is to be a force for good, by leveraging our entrepreneurial spirit and the power of merchandise to protect our people, communities, and natural resources for future generations. Throughout our history, in every community we serve, we have committed to making an impression without leaving a footprint.

This means partnering with suppliers who share in our commitment to give back more than we take. So, while BDA has been environmentally aware and implemented numerous measures throughout the company’s nearly four decades in business, we realise there is much more to do to protect the globe and the communities we serve.

Our Code of Conduct requires suppliers to ensure they do not do unnecessary harm to the environment and comply with legal environmental protections. It forms part of our suppliers contracts. Suppliers must sign our code and any contravention of it can result in termination of contract.

### EcoVadis Engagement

In 2023, we began rolling out awareness to our preferred suppliers regarding our new partnership and adoption of the EcoVadis platform. This included requesting all of our Platinum, Gold and Silver level preferred suppliers to complete the assessment, and request that they share their scorecards with BDA. By our suppliers completing the assessment and sharing their scorecards with us, it helps us better understand the sustainability performance of our supply chain.

EcoVadis is a tool used globally to manage and measure the ESG practices of both upstream and downstream suppliers. We started with our key suppliers and plan to expand this scope in future years, with the intention to use this information to better inform our supplier relationships and decision-making.

As a company, we have also undergone the EcoVadis assessment ourselves for both our UK and North American counterparts. EcoVadis has been an important transparency tool for a number of our clients, and we are happy to provide transparency to our partners by sharing our EcoVadis scorecard with them.

### 2023 Data

Suppliers committed to BDA Code of Conduct	100%
Supplier contracts with social and environmental clauses	100%
New suppliers completing our vetting questionnaire	100%
Suppliers with completed social and environmental audits	42
Capacity building with suppliers through corrective action follow up	32
Buyers receiving training on sustainable procurement	100%
Number of supply chain child labour incidents reported	0
Number of supply chain forced labour incidents reported	0



### Current Overview

BDA has been involved in direct steps to tackle climate change for a number of years. We support the work of Ecologi to help reduce carbon emissions and plant trees. We have supported wind and hydropower projects around the world and funded a waste biomass electricity project in Chile. We have given profits to plant trees in Madagascar, Uganda and Kenya, and helped prevent deforestation in the Democratic Republic of Congo.

The global pandemic helped us to reorganise our ways of working. We now promote home working which helps cut transportation emissions, and we moved into modern shared office space with smart, carbon-efficient gas and electricity systems to reduce the size of our own footprint.

Our Manchester office car park has electric charging points to encourage our employees to replace their vehicles with electric ones.

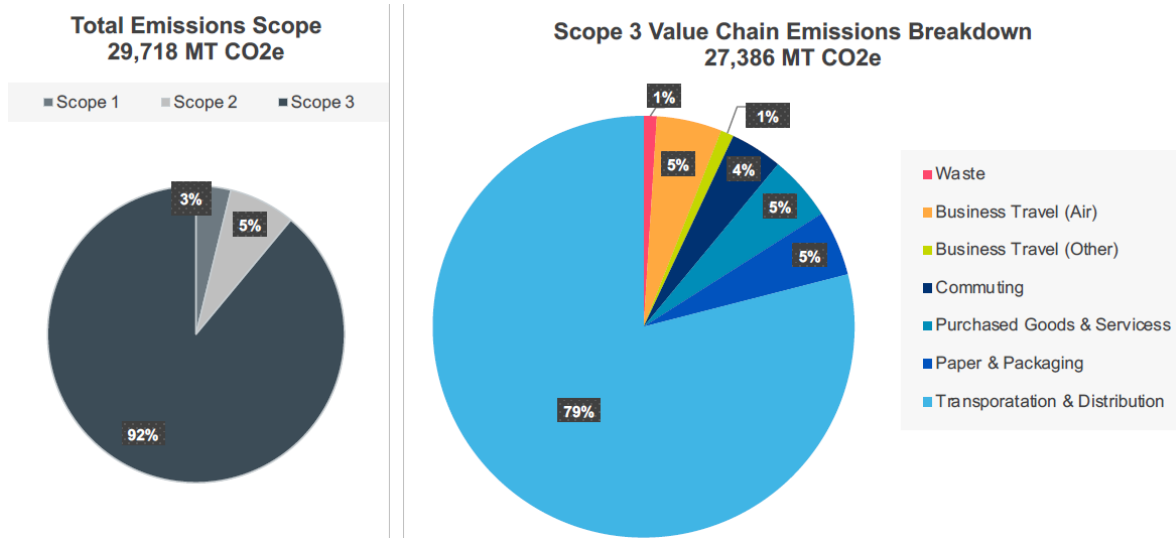
In line with the EU initiatives to reduce logistics emissions, we have implemented several measures to optimise logistics operations. These include consolidating logistics, switching from aviation to rail transportation, optimising routes, and changing logistics timing. We are also exploring other methods to reduce logistics emissions.

We track orders transported via sea and air to monitor the carbon emissions in our logistics operations. Air freight is much more carbon intensive than sea freight so the more products we can ship by sea the better.

Additionally, we are committed to reducing the packaging weight of goods and services and increasing online and virtual services to align with the EU's changing provision of goods and services initiative. Our team is open to exploring other ways to support these EU initiatives as part of our commitment to ESG. Through these programs, we aim to ensure that our suppliers share our commitment to sustainability and work with us to reduce our collective impact on the planet.



In 2022 we established our global baseline GHG Emissions data. In 2023 we worked with consultants point b to compile data on our corporate Greenhouse Gas emissions for the global business.



### 2023 UK Emissions Data

Scope 1	2.85 MTCO <sub>2</sub> e
Scope 2	4.67 MTCO <sub>2</sub> e
Scope 3	51.92* MTCO <sub>2</sub> e
Scope 3 Downstream	5.9*
Scope 3 Upstream	46.02*
Total Energy Use	25 mWh
Renewable Energy Use	0 mWh

\*based on corporate data: 18% increase on 2022

### 2023 Environmental Data

New employees receiving energy conservation training	100%
New employees receiving waste and recycling training	100%
Number of pieces of IT equipment recycled	21
Total weight of hazardous waste	0 kg
Total weight of waste recovered	0 kg
Number of customer injuries	0
Number of product recalls	0
Percentage of eco products sold	4%

# Annex I

## GRI Reporting Requirements

### 2 General Disclosures

#### 2-1 Organisational details

Bensussen Deutsch & Associates, LLC.

Worldwide Headquarters: 15525 Woodinville-Redmond Rd NE, Woodinville, WA, USA

Other countries of operation:

Canada, United Kingdom, France, China, Philippines

#### 2-2 Entities included in this sustainability reporting

This report is prepared by and covers the UK operations of BDA Ltd only.

#### 2-3 Reporting period, frequency and contact point

Our annual sustainability reporting is in line with our financial reporting year April to March. This report was published on 1st October 2024. For any queries about the reporting please contact [kronan@bdainc.com](mailto:kronan@bdainc.com).

#### 2-4 Restatements

There are no restatements of information in this report.

#### 2-5 External assurance

Due to the size of the business we have not formally assured this sustainability report. We have worked with an independent sustainability consultant to support our work on this report.

#### 2-6 Activities, value chain and other business relationships

We're an agency for branded merchandise solutions, online company stores, and on-site brand experiences. We help brands connect with people where work and life happen.

We bring more than 75 years of cumulative industry experience to help clients carry out innovative in-store features and displays, gifting programs and custom bespoke opportunities. We've established a "glocal" structure, in that we leverage our global marketing and procurement expertise through the lens of the local markets we're targeting.

We offer on-site agency support to assist with local activations, including the added convenience of our UK-based distribution centre. For example, we partner with the NFL for its annual International Series, delivering custom merchandise to drive ticket sales and enhance the fan experience.

From our UK office we serve clients across EMEA. We have suppliers across Europe and use our sourcing office in Shenzhen, China to meet the growing demand of our customers.

#### 2-7 Employees - Page 9

#### 2-8 Workers who are not employees

We do not have workers who are not employees.

#### 2-9 Governance

BDA C-suite is the CEO, CFO, CXO, CDO, CSO and CHRO. The C-suite and the Management team are responsible for the daily operations of the company. The daily operations in the different locations are managed by local management teams reporting to the relevant members of the BDA Management team.

The composition of the highest governance body and its committees:

i. executive and non-executive members; All members are executive



- ii. independence; None
- iii. tenure of members on the governance body; The tenure of the C-suite between 1 to 20 years.
- iv. number of other significant positions and commitments held by each member, and the nature of the commitments; None
- v. gender; 1 woman, 5 men
- vi. under-represented social groups; none
- vii. competencies relevant to the impacts of the organisation; Sales, Finance, Legal & compliance, HR, IT, Product Management, Sustainability, Digital Sales & Marketing, SO&P, Operations
- viii. Stakeholder representation; none

## **2-10 Nomination and selection of the highest governance body**

This is something that we track but due to confidentiality issues we chose to omit this disclosure.

## **2-11 Chair of the highest governance body**

Our CEO is the Chair of the highest governance body.

## **2-12 Role of the highest governance body in overseeing the management of impacts**

The C-Suite and management team engages with stakeholders across the business to develop the company's sustainability goals. In 2022 we made several leadership commitments to further promote inclusivity and sustainable practices throughout the organisation, including:

- expanding the leadership team to be more inclusive across the company
- creating an internal ESG Business Partners group
- expanding the HR department
- expanding employee training
- approving the ESG Roadmap

## **2-13 Delegation of responsibility for managing impacts**

The C-Suite has delegated responsibility for managing impacts to the internal ESG Business Partners. This team of five senior managers from across the organisation are responsible for progressing the business' objectives in all ESG areas. They meet quarterly and create reporting for feedback to the board.

## **2-14 Role of the highest governance body in sustainability reporting**

The highest governance body is responsible for approving information in our global reporting, including material topics. The CEO validates and signs the global sustainability report. Information from the global report is used in the UK report. The reporting for the UK is the responsibility of the UK-based ESG Business Partner.

## **2-15 Conflicts of interest**

We have a Business Ethics policy including processes to ensure that conflicts of interest are mitigated.

## **2-16 Communication of critical concerns**

The senior leadership team meets regularly with the opportunity to discuss critical concerns. No critical concerns arose in this reporting period.

## **2-17 Collective knowledge of the highest governance body**

The professional development of members of our highest governance body on sustainability issues is achieved through training courses, engaging with external sustainability experts on factors affecting the business and by integrating our reporting into the Global Reporting Initiative framework.

## **2-18 Evaluation of the performance of the highest governance body**

This information has been omitted due to confidentiality constraints. The performance of the governance body in overseeing the organisation's impacts on the economy, environment and people

is evaluated on an ongoing basis.

### **2-19 Remuneration policies**

We have an overview of the remuneration policies for members or the governance body but we do not disclose this information due to confidentiality.

### **2-20 Process to determine remuneration**

Our process for designing our remuneration policies and determining remuneration are confidential and not disclosed.

### **2-21 Annual total compensation ratio**

This information is confidential and has therefore been omitted from the report.

### **2-22 Statement on sustainable development strategy - Pages 3-14**

### **2-23 Policy commitments - Pages 22-37**

Our policies are included in the annexes of this report and are publicly available on the BPMA website as part of our Step Forward Pledge <https://www.bpma.co.uk/Organization?ID=1057>

### **2-24 Embedding policy commitments - Pages 22-37**

Our policies are included in the annexes of this report and are publicly available on the BPMA website as part of our Step Forward Pledge <https://www.bpma.co.uk/Organization?ID=1057>

### **2-25 Processes to remediate negative impacts - Pages 22-37**

Our remediation commitments and processes are included in our policy documents.

### **2-26 Mechanisms for seeking advice and raising concerns - Page 22-30**

Our Business Ethics Policy describes the mechanism for raising concerns about business conduct.

### **2-27 Compliance with laws and regulations**

There have not been any significant instances of non-compliance with laws and regulations during the reporting period.

### **2-28 Membership associations - Page 3**

We are members of the BPMA and have committed to their StepForward Pledge. Our pledge is publicly available on the BPMA website.

### **2-29 Approach to stakeholder engagement - Page 5**

We conducted the materiality assessment to establish the key areas to focus our strategy on. We consulted internal and external stakeholders as well as third party experts to determine the topics to be addressed.

### **2-30 Collective bargaining agreements - page 10**

All employees have freedom of association. There are no collective agreements currently in place.

## **3 Material Topics**

### **3-1 Process to determine material topics - Page 5**

### **3-2 Material topics - Page 5-6**

### **3-3 Management of material topics - Pages 3-14**

Throughout this report we cover all of the material topics and explain in each section how we manage our impact.

## **308 Supplier Environmental Assessment**

**308-1 New suppliers that we screened using environmental criteria - Page 10**

**308-2 Negative environmental impacts in the supply chain and actions taken - Page 10**

## **410 Employment**

**401-1 New employees hires - Page 6**

**401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees**

All of our employees are employed on a full-time basis

**401-3 Parental leave - Page 7**

## **403 Occupational Health and Safety**

**403-1 Occupational health and safety management system - Page 7**

We voluntarily developed a new ISO 45001 management system. This is not a legal requirement.

**403-2 Hazard identification, risk assessment and incident investigation - Page 7**

Hazard identification, risk assessment and incident investigation are part of our ISO 45001 management system.

**403-3 Occupational health services - Page 7**

**403-4 Worker participation, consultation, and communication on occupational health and safety - Page 7**

We partnered with Qualtrics, one of the world's leading survey companies, to create an employee experience survey that covers all areas related to a positive workplace.

**403-5 Worker training on occupational health and safety - Page 7**

**403-6 Promotion of worker health - Page 7**

**403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationship - Page 7**

**403-8 Workers covered by an occupational health and safety management system - Page 7**

**403-9 Work related injuries - Page 7**

**403-9 Work related ill health - Page 7**

## **405 Diversity and Equal Opportunity**

## **405-1 Diversity of governance bodies and employees - Page 10**

### **405-2 Ratio of basic salary and remuneration of women to men - Page 8**

We conducted a pay review and determined that no woman is paid less than a man for a comparable position.

## **406 Non-discrimination**

### **406-1 Incidents of discrimination and corrective actions taken - page 9**

## **408 Child Labour**

### **408-1 Operations and suppliers at significant risk for incidents of child labour**

There were no incidents of child labour found in our business or in our supply chain during factory audits.

## **409 Forced or Compulsory Labour**

### **409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour**

There were no incidents of forced or compulsory labour found in our business or in our supply chain during factory audits.

## **414 Supplier Social Assessment**

### **414-1 New suppliers that were screened using social criteria - page 13**

### **414-2 Negative social impacts in the supply chain and actions taken - page 13**

## **417 Marketing and Labelling**

### **417-1 Requirements for product and service information and labelling**

We provide instructions with all of our products where necessary to inform end users of hazards and actions required to mitigate environmental impacts such as the handling and recycling of electrical waste.

### **417-2 Incidents of non-compliance concerning product and service information and labelling - page 15**

No legal or safety issues were identified in relation to our products or labelling.

### **417-3 Incidents of non-compliance concerning marketing communications - page 15**

No issues were reported relating to our marketing communications. We have a Business Ethics Policy including a section on Responsible Information Management. This requires all of our advertising and messaging to be accurate and truthful.

## **205 Anti-Corruption**

**205-1 Operations assessed for risks related to corruption - page 11**

**205-2 Communication and training about anti-corruption policies and procedures - page 11**

**205-3 Confirmed incidents of corruption and actions taken - page 11**

## **Annex II**

# **BDA UK Business Ethics Policy**

### **Introduction**

This policy outlines BDA's commitment to ethical and responsible conduct in all our business practices. We strive to uphold the highest standards of integrity and ethical behaviour in all aspects of our operations, including interactions with our employees, customers, shareholders, suppliers, and the wider community.

Our Business Ethics Policy is a guiding document that outlines our principles and values, and provides a framework for ethical decision-making across our organisation. The policy reflects our commitment to compliance with all applicable laws and regulations, as well as our dedication to ethical conduct that goes beyond mere legal compliance.

We recognise that ethical considerations are integral to sustainable and long-term success in business. This policy is designed to help us create a positive and ethical work environment, promote integrity and trust, and safeguard our reputation as a responsible corporate citizen.

This policy is a living document that we will continually review and update to reflect changes in our industry, business environment, and the evolving ethical landscape. We encourage all employees, partners, and stakeholders to read and familiarise themselves with this policy and to share their feedback and ideas for improvement. Together, we can uphold our commitment to ethical behaviour and build a sustainable and responsible business for the future.

### **Scope**

This policy applies to all individuals working for the company, including anyone providing services to the company such as third-party consultants or contractors. All business functions are covered by every aspect of this policy.

### **Governance and Responsibilities**

All employees and workers have a responsibility for compliance with this policy and for ensuring that their duties and responsibilities are carried out with a view to the protection of BDA assets and resources and those of BDA clients, customers, partners, contractors and suppliers. This includes complying with their responsibilities to report suspected issues or any evidence received concerning irregular or improper behaviour in accordance with reporting procedures set out in this policy. In addition to their responsibilities as BDA employees, managers at all levels are responsible for exercising due diligence to prevent, detect and report improper acts. This will include the reporting of any such acts by employees or workers under their supervision. In accordance with the reporting procedure set out in this policy, managers have a responsibility to ensure that any reports of suspected fraud or irregular/improper behaviour are reported immediately to a director. Managers are expected to assist directors in the prevention and detection of improper behaviour and may be required to undergo training to assist them in this role.

Our CEO has overall responsibility for the deterrence, detection, management and investigation of improper behaviour. This includes the following actions which are carried out by the CEO's management team:

- Developing and maintaining effective controls. This includes identifying the risks within

BDA systems and procedures and, where appropriate, those of any third parties with whom BDA is dealing.

- The development and maintenance of a training programme to ensure that managers who have day-to-day responsibility for implementing this policy are properly equipped to check that there are effective controls in place.
- The investigation of any report of improper behaviour.
- The reporting of any suspected illegal activities to the relevant authorities.
- The taking of appropriate legal action to ensure that any BDA assets, which have been improperly or fraudulently obtained, are recovered.
- The taking of appropriate disciplinary action against the perpetrators of improper behaviour.
- The distribution of reports (where appropriate) to BDA Board and/or managers/employees/workers to limit any re-occurrence of issues.
- Reporting to any third parties who may be or are affected by these issues.
- Liaison with third parties and in particular with partners, contractors and subcontractors, and suppliers to ensure that they conduct their business with the precepts of this policy.

## **Anti-Bribery**

BDA is committed to implementing and enforcing effective systems to counter bribery. We conduct all aspects of our business in an honest and ethical manner at all times. We aim to maintain the highest possible standard of business practice and advise individuals of the company's zero tolerance to bribery.

The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make or accept 'kickbacks' of any kind.

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Employees must not:

- Request, offer or accept any financial or other reward from any person in return for providing some favour.

## **Gifts and Hospitality**

BDA does not prohibit giving and receiving promotional gifts of low value or normal and appropriate hospitality.

### **Receiving Business Gifts**

Receiving promotional gifts of low value is normal and appropriate; however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to the company.

### Offering Business Gifts

Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

### Receiving Hospitality

The acceptance of corporate hospitality must be transparent; all invitations must be reported to the company before an employee accepts any invitation. The following areas are exempt while attending conferences, and seminars sponsored by third parties:

- Business and travel expenses incurred
- Normal business lunches and meals

### Offering gifts and hospitality

Company hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.

### Donations to Organisations

No donations should be made to charities, political parties or other organisations without approval.

## **Non-Compliance**

Employees failing to observe company policy may lead to disciplinary action in accordance with the company's Disciplinary Policy. In the event of a breach of the policy by other organisations, or individuals, the company will take appropriate action.

## **2025 Anti-Bribery Targets**

- Zero acts of bribery within the business
- Cease partnerships with 100% of third-party partners found to be involved in bribery
- Training for 100% of employees on bribery and corruption

## **Code of Business Conduct**

This Code of Business Conduct covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees and officers of the company. All of our employees and officers must conduct themselves accordingly and seek to avoid even the appearance of improper behaviour. The code should also be provided to and followed by the company's agents and representatives. In addition, company policies apply to various company operations and employees need to know and follow those policies that apply to their company work.

If a law conflicts with a policy in this code, an employee must comply with the law. Also, if a local custom or policy conflicts with this code, they must comply with the code. If they have any questions about these conflicts, they should ask their supervisor how to handle the situation. Employees and officers are responsible for understanding the legal and policy requirements that apply to their jobs and reporting any suspected violations of law, this code or company policy.

Those who violate the standards in this code will be subject to disciplinary action, including possible dismissal. Furthermore, violations of this code may also be violations of the law and may result in civil or criminal penalties for the employee, their supervisors and/or the company.

The basic principles discussed in this code are subject to any company policies covering the same issues.



### **Compliance with laws, rules and regulations**

Obeying the law, both in letter and in spirit, is the foundation on which this company's ethical standards are built. All employees and officers must respect and obey the laws, rules and regulations of the countries in which we operate. Although employees and officers are not expected to know the details of each of these laws, rules and regulations, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

### **Conflicts of Interest**

A "conflict of interest" exists when a person's private interest interferes in any way - or even appears to interfere - with the interests of the company. A conflict situation can arise when an employee or officer takes action or has interests that may make it difficult to perform his or her company work objectively and effectively. Conflicts of interest may also arise when an employee or officer, or a member of his or her family, receives improper personal benefits as a result of his or her position in the company. Loans to, or guarantees of obligations of, employees and officers and their family members by the company may create conflicts of interest and in certain instances are prohibited by law.

BDA will not become involved in any conflicts of interest. We will ensure our Management team are aware of potential conflicts of interest in their roles. We will provide training to all employees on conflicts of interest.

It is a conflict of interest for a company employee or officer to work for a competitor, customer or supplier. An employee should avoid any direct or indirect business connection with our customers, suppliers or competitors, except as required on our behalf.

Conflicts of interest are prohibited as a matter of company policy, except as approved by the Board of Directors. Conflicts of interest may not always be clear-cut, so if an employee has a question, they should consult with their supervisor. Any employee or officer who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate personnel.

### **Insider Trading**

All non-public information about the company should be considered confidential information. Employees and officers who have access to confidential information about the company or any other entity are not permitted to use or share that information for trading purposes or for any other purpose except the conduct of the company's business. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal.

### **Corporate Opportunities**

Employees and officers are prohibited from taking for themselves opportunities that are discovered through the use of corporate property, information or position without the consent of the Board of Directors. No employee or officer may use corporate property, information, or position for personal gain, and no employee or officer may compete with the company directly or indirectly. Employees and officers owe a duty to the company to advance the company's interests when the opportunity to do so arises.

### **Anti-Competition and Fair Dealing**

We will seek to outperform our competition fairly and honestly. We will seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the

owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. BDA will endeavour to respect the rights of and deal fairly with the company's customers, suppliers, competitors and employees. BDA will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.

BDA will not engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal anti-competitive activities.

To maintain the company's valuable reputation, compliance with our quality processes and safety requirements is essential. All inspection and testing documents must be handled in accordance with all applicable specifications and requirements.

### **Money Laundering**

Money laundering is concealing the criminal origin of money or other assets so they appear to come from a legitimate source. BDA are aware of the risk of third parties exploiting us to engage in money laundering. We will not assist, support, participate in or permit money laundering. We will not accept money or other assets if we know or suspect that they derive from any kind of criminal activity. We will not deal with criminals, suspected criminals or the proceeds of crime.

We will not facilitate the acquisition, ownership or control of criminal proceeds or other assets deriving from criminal activity, nor will we assist others in concealing criminal proceeds or assets. We require employees to be alert to any unusual or suspicious arrangements which could expose us to the risk of money laundering and to report such arrangements to their line manager or senior management.

### **Political Contributions**

Except as approved in advance by the Chief Executive Officer or Financial Controller, BDA prohibits political contributions (directly or through trade associations) by the company or its business units. This includes:

- any contributions of company funds or other assets for political purposes,
- encouraging individual employees to make any such contribution
- reimbursing an employee for any contribution.

Individual employees are free to make personal political contributions as they see fit.

### **Discrimination and Harassment**

The diversity of the company's employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment based on race, colour, religion, sex, national origin or any other protected class.

### **2025 Business Conduct Targets**

- Zero acts of money laundering within the business
- Zero conflicts of interest within the business
- 100% of all violations dealt with in accordance with this policy
- Cease partnerships with 100% of third-party partners found to be involved in illegal activity

## **Fraud**

BDA's attitude to fraud is that of zero tolerance. BDA will not tolerate fraud, dishonest or illegal activity amongst its employees, workers or its partners, contractors or suppliers under any circumstances. BDA is committed to investigating cases of suspected fraud and illegality and, where appropriate, taking disciplinary action or referring matters to the authorities for further investigation which may lead to prosecution.

The purpose of this statement is to clearly set out BDA's policy concerning the detection and deterrence of fraud and the procedures to be followed by BDA employees and workers and, where appropriate, BDA contractors, partners and suppliers if fraud is suspected or detected.

### **Fraud and Illegality**

There is no precise legal definition of fraud. Fraud can be used to describe a deliberate act to acquire the assets or property of others by deception, trickery or dishonesty. It can often involve more than one person and in these cases, there can be a conspiracy to defraud. Fraud can affect assets that are both small and large in value. It can take place in small amounts over a long period of time or can represent just one incident where considerable value is involved. In its simplest form, fraud could be the misappropriation of goods or equipment.

For the purposes of this policy, fraud will include but will not be limited to the following:

- Theft or misappropriation of BDA assets or the assets of any third parties that BDA deals with.
- The submission of false claims or invoices for payment or reimbursement.
- Accepting or offering a bribe, accepting gifts or other favours under circumstances that might lead to the inference that the gift or favour was intended to influence a decision.
- Blackmail or extortion.
- Accepting or offering an inducement to or from a third party, which could be considered to be a kickback.
- The deliberate supply or certification of sub-standard quality goods.
- False accounting or making false or fictitious entries concerning accounts, equipment or supplies.
- The deliberate rigging of tenders or specifications to favour a particular party.
- The payment of excessive prices or fees where they are not justified.
- Facilitation payments defined as "any payment made as a bribe to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement".

BDA will not become involved in any fraudulent activity. We will not conduct business with any third parties that are known to be involved in fraudulent activity. We will provide training to all employees to enable them to identify and avoid fraud.

### **Reporting of a Suspicion of Fraud or Irregular/Improper Behaviour**

In the event that there is any suspicion of fraud or irregular/ improper behaviour, this suspicion must be reported immediately to a manager. If this is not appropriate because an employee or worker may suspect that their manager is involved in the behaviour, it should be reported to the Managing Director. If a report to the Managing Director is not appropriate because they have reason to believe that they are also involved in the behaviour, an employee or worker should make this report to the Company Secretary.

### **Investigation**

On receipt of a report or a notification of suspected fraud or irregular/improper behaviour the Managing Director (or if this is not appropriate, the Company Secretary) will implement the BDA Fraud Response Plan.

### **Action Following Investigation**

In accordance with this policy BDA will, after proper and appropriate investigation, consider the necessary course of action to be taken. In the case of employees, this may include suspension, disciplinary action, including dismissal, the pressing of charges against employees, workers or third parties and the issue of legal proceedings to recover any loss which BDA or a third party may have suffered. In particular, if the circumstances are such that it is considered appropriate, BDA will report any fraud or improper/irregular behaviour to the police or other authorities without delay.

### **2025 Anti-Fraud Targets**

- Zero acts of fraud within the business
- 100% of all violations dealt with in accordance with this policy
- Cease partnerships with 100% of third-party partners found to be involved in fraud

## **Responsible Information Management**

### **Misleading Advertising**

At BDA, we are committed to upholding the highest standards of ethical conduct and providing accurate and truthful information to our customers. We recognize that misleading advertising can harm consumers and damage our reputation. Therefore, we have established the following rules to ensure that all our advertising is transparent, truthful, and complies with all applicable laws and regulations.

### **Truthful and Accurate Information**

All advertising and marketing communications must be truthful, accurate, and not misleading. We will ensure that all statements made in our advertising are supported by evidence that is reasonable and reliable.

### **Clear and Transparent Messaging**

Our advertising must be clear and transparent. We will avoid any advertising that could be interpreted as deceptive or that misleads consumers about the nature, characteristics, suitability, or benefits of our products or services.

### **Compliance with Legal and Regulatory Requirements**

All advertising must comply with all applicable laws and regulations. We will ensure that our advertising is consistent with the guidelines set forth by relevant regulatory bodies.

### **Endorsements and Testimonials**

If we use endorsements or testimonials in our advertising, they must be genuine and reflect the honest opinions of the endorser or testimonial giver. We will not use endorsements or testimonials that are misleading or not representative of the experiences of our customers.

### **Training and Awareness**

We will provide training and awareness programs to all employees and contractors involved in advertising and marketing communications. We will ensure that all staff members are aware of their obligations under this policy and the importance of providing accurate and truthful information to our customers.

## **2025 Responsible Information Management Targets**

- Zero complaints relating to our advertisements
- Cease partnerships with 100% of third-party partners found to be involved in serious violations of this policy

## **Personal Information**

We recognise that the protection of personal data is an essential part of our responsibilities to our customers, employees, and stakeholders. This policy outlines our approach to responsible information management, including the collection, use, and disclosure of personal information.

### **Collection of Personal Information**

We will only collect personal information that is necessary for the purposes identified by us and that is consented by the individual. We will use fair and lawful means to collect personal information.

### **Use of Personal Information**

We will use personal information only for the purpose for which it was collected unless we have obtained the consent of the individual or as required by law. We will take reasonable steps to ensure that personal information is accurate, complete, and up-to-date.

### **Disclosure of Personal Information**

We will not disclose personal information to third parties unless we have obtained the consent of the individual or as required by law. We will take reasonable steps to ensure that personal information is protected against unauthorised access, disclosure, or misuse.

### **Storage and Retention of Personal Information**

We will store personal information in a secure manner, including physical and electronic security measures. We will retain personal information only for as long as necessary for the purposes for which it was collected, or as required by law.

### **Access and Correction of Personal Information**

Individuals have the right to access their personal information held by us, subject to any applicable exceptions under the law. We will provide individuals with access to their personal information upon request. Individuals may also request that their personal information be corrected if it is inaccurate, incomplete, or out-of-date.

### **Complaints**

Individuals may lodge a complaint with us if they believe that we have breached this policy or any applicable privacy laws. We will investigate all complaints and take appropriate action to address any breaches.

### **Training and Awareness**

We will ensure that all employees, contractors, and third parties who handle personal information are aware of their obligations under this policy and any applicable privacy laws. We will provide regular training and awareness programs to ensure that all staff members are up to date with privacy practices and regulations.

### **Privacy by Design**

We embed privacy considerations into our business processes and projects. We will undertake privacy impact assessments for any new initiatives, ensuring that privacy risks are identified and managed appropriately.

### **2025 Personal Information Targets**

- Zero acts of misuse of information within the business
- 100% of all violations dealt with in accordance with this policy
- Cease partnerships with 100% of third-party partners found to be in serious violation of this policy

### **Monitoring and Review Mechanism**

Monitoring of the policy is essential to assess how effective the company has been to establish control of its obligations. The policy will be monitored by management on an ongoing basis to ensure that it addresses issues effectively. The following will be monitored:

- That all individuals working for the company are advised of the policy.
- That the policy is still relevant
- Whether additions are required to the policy following changes in circumstances or legislation
- Assessment of any reported incident or related occurrence.

All employees are encouraged to provide feedback on the policy and propose improvements. Should any amendments, revisions or updates be made to this policy it is the responsibility of senior management to ensure that all relevant employees receive notice. Written notice and/or training should be considered.

This policy is regularly reviewed, at least annually, and is updated as and when required. The next review is due August 2024.

Initial Date	19 <sup>th</sup> September 2023
Latest Revision	12 <sup>th</sup> August 2024
Issue Number	V2

## **Annex III**

### **BDA UK Environmental Policy**

#### **Introduction**

BDA's vision is to be a force for good by leveraging our entrepreneurial spirit and the power of merchandise to protect our people, communities, and natural resources for future generations. Throughout our history, in every community we serve, we have committed to making an impression without leaving a footprint. This means acknowledging our role in creating an environmentally friendly and socially responsible workplace is as important as partnering with clients and suppliers who share in our commitment to give back more than we take. So, while BDA has been environmentally aware and implemented numerous measures throughout the company's nearly four decades in business, we realize there is much more to do to protect the globe and the communities we serve.

In addition to establishing measurable and actionable steps to reduce our impact on the planet, we are also exercising influence with our manufacturing and supplier partners to hold us all accountable in becoming better environmental stewards.

BDA is motivated to source eco-friendly merchandise options for our clients and be proactive to offset our carbon footprint. Whether it's a need for biodegradable packaging, antibacterial products, reclaimed or reusable products, or apparel made from Fairtrade, renewable and recycled fabrics, we want to enable brands to exercise their commitment to environmental sustainability.

#### **Scope**

This policy covers all actions associated with the UK BDA business, including all of the UK-based staff, clients, suppliers, and third parties engaged to carry out work on our behalf.

#### **Responsibilities**

Our CEO, Jay Deutsch, is ultimately responsible for setting the environmental goals for the business and ensuring they are achieved. The UK-based Directors are responsible for ensuring the actions to achieve the goals are carried out. Our UK Head of Procurement has day-to-day responsibility to oversee our environmental programme related to the supply of goods.

#### **Use of Materials, Waste Management, Recycling, Pollution and Biodiversity**

BDA sites in the UK are not involved in the production of goods or any activities that could be expected to generate significant pollution or waste. All waste from our offices is collected and recycled where possible. This is managed by our serviced office providers. Our business operations do not have any direct impact on the local environment or biodiversity in the area. Employees are encouraged to regularly work from home to minimise the pollution associated with transportation.

#### **Commitments**

- We are committed to sorting all of our office waste to maximise the amount of recycled materials
- We will minimise the amount of waste sent to landfill
- We will encourage employees to minimise waste and use reuseable utensils in the office
- We will dispose of all hazardous materials, such as IT equipment, responsibly

#### **Energy Consumption, Greenhouse Gasses and Water Use**

BDA's UK operations are office-based. We use serviced facilities for which we have little control over issues related to water and energy use, and greenhouse gas emissions. Staff are encouraged to save electricity and minimise the use of water and energy where possible, including switching off lights and equipment when not in use, and keeping external doors and windows closed to reduce heat loss.

### **Commitments**

- We will strive to minimise the amount of energy we consume
- We will aim to source renewable energy solutions for our workspaces
- We will encourage employees to take everyday steps to save energy wherever possible in the office
- We will not generate any unnecessary greenhouse gasses
- We will not use water unnecessarily

### **Environmental Services and Advocacy**

BDA's desire is to partner with the other businesses and external stakeholders we interact with to promote environmental responsibility. From promoting sustainable alternative products to clients to conducting social audits of our suppliers, including environmental elements, we are working along the full length of our supply chain to positively affect a wider footprint than our own.

### **Commitments**

- We will promote more sustainable alternative products to clients wherever possible
- We will provide online catalogues and webstores with information on the materials used in products and the associated carbon footprints
- We will offer transportation solutions that minimise carbon emissions wherever possible

### **Customer Health and Safety**

Products are developed by BDA to be safe and fit for purpose. We use third-party experts in product safety and compliance to help us mitigate product risks. Products are tested by third parties to British, European and global standards where applicable, to ensure they cannot cause injury with any foreseeable use.

### **Commitments**

- We will ensure all products we sell are safe for use
- We will mitigate health and safety risks associated products during their development
- We will ensure all products are tested to ensure they are safe and legally compliant
- We will provide instructions for use with products to make sure customers are aware of how to use them properly and minimise the risk of injury
- We will inspect goods prior to shipment to ensure they have been made in line with our expected standards
- We will monitor feedback on product quality and safety issue and take appropriate recall actions if any safety concerns are highlighted

### **2025 Goals**

- Achieve 90% renewable energy at 90% of BDA facilities by the end of 2025
- Commit \$50,000 to tree planting
- 100% of employees to be trained on energy conservation
- Zero product safety complaints
- Zero product recalls
- 100% of all paper and card to be sorted for recycling in the office
- 100% of employees to be trained on sorting waste
- 25% orders placed to be fulfilled with more sustainable options
- 10% increase in the number of more sustainable products promoted to customers



**Review and Reporting**

This policy is reviewed at least annually and updated as necessary.

These goals are incorporated into our annual Sustainability Report. Progress against the goals is measured annually and the results are published in the Sustainability Report each year.

## **Annex IV**

# **Sustainable Procurement Policy**

## **Environment and Ethics**

BDA is committed to sustainable procurement practices, minimising its environmental impact and ensuring fair treatment of workers throughout its supply chain. This policy is applicable to all of BDA's procurement activities in relation to the goods and services that it buys. It outlines our own standards for working with suppliers and our requirements for suppliers doing business with us. The purpose of the policy is to ensure our entire supply chain acts responsibly, complies with the law and meets BDA sustainability standards.

We are focussed on growing our business within a model of sustainable procurement and must work with our supply chain to build up joint values that will ensure the welfare of people and that our sourcing practices do not have a negative impact on the environment.

### **Scope**

The policy applies to all individuals working for the company involved in procurement. This includes goods for sale and goods not for resale. It covers all geographical regions in which the business operates.

### **Governance and Responsibilities**

The Director of EMEA Procurement has overall responsibility for this policy and ensuring that it is implemented across the business and that all employees involved in procurement are trained to effectively carry out their duties in relation to this policy. All individuals involved in procurement are responsible for the day-to-day actions which affect compliance with this policy. is responsible for ensuring

### **Sustainable Procurement - BDA Commitments**

- Auditing the social and environmental practices of potential suppliers before placing orders.
- Assessing suppliers' environmental and ethical practices and selecting business partners that are committed to treating workers fairly and minimising their negative impact on the planet.
- Selecting products made with materials and manufacturing practices that have the lowest environmental impact where possible.
- Encouraging customers to select products made from sustainable materials.
- Promoting positive environmental and ethical principles and practices to all of our business partners.
- Considering the environmental impact of all of our activities relating to procurement including the transportation of goods and aiming to choose the most sustainable options.
- Reporting our progress against these objectives in our annual Sustainability Report.
  
- Encourage suppliers to calculate their emissions to reduce freight emissions
- Review all domestic supply chain practices to elevate and enhance high ethical, health and safety standards of our suppliers

### **Sustainable Procurement - Supplier Expectations**

We expect our suppliers to:

- Comply with all applicable regional environmental regulations.

- Continually look for ways to reduce their environmental impact through the resources they use and manufacturing methods.
- Promote sustainable and ethical practices within their own supply chain.
- Sign our code of conduct.
- Engage in our audit process and be proactive in resolving corrective actions in partnership with us.

### **Enforcement of Policy**

This policy is enforced through the application of our Supplier Code of Conduct. All suppliers must sign our Code of Conduct before we will do business with them. It forms part of our legal contract with suppliers.

### **2025 Targets**

- 100% of suppliers to sign our Code of Conduct which covers social and environmental aspects
- 100% of suppliers to be audited on social and ethical issues and corrective action plans progressed as necessary
- 100% of new suppliers are approved via our onboarding process, including social and ethical checks
- 100% of procurement employees to be trained on sustainable procurement issues

### **Monitoring and Review Mechanism**

Monitoring of this policy is essential to assess how effective the company has been in its implementation. The policy will be monitored by the Director of EMEA Procurement on an ongoing basis to ensure that it addresses issues effectively. The following will be monitored:

- That all affected employees are advised of the policy
- That the policy is still relevant
- Whether additions are required to the policy following changes in circumstances
- Assessment of any reports of the business acting out of compliance with the policy

All employees involved in procurement are encouraged to provide feedback on the policy and propose improvements. Should any amendments, revisions or updates be made to this policy it is the responsibility of the Director of EMEA Procurement to ensure that all affected employees receive notice. Written notice and/or training should be considered.

The policy is regularly reviewed, at least annually, and is updated as and when required. The next review is due August 2025.

Initial Date	19 <sup>th</sup> September 2023
Latest Revision	12 <sup>th</sup> August 2024
Issue Number	V2

## **Annex V**

### **BDA Human Rights Policy**

#### **Scope**

This policy applies to all employees and Directors, at BDA UK. It is essential that it is read by all and understood. It covers all matters relating to the health and wellbeing of all employees and personnel that interact with BDA.

#### **Overview**

BDA has the highest standards for the treatment of its own employees. Colleagues must be treated with respect and given the resources and opportunities they need to flourish in their roles.

#### **Unlawful Labour Commitments**

- BDA will not be involved in any labour practices that are against the law, including slave labour, child labour or forced labour of any kind.
- We will only work with registered, professional agencies to support our recruitment process.
- We will use professional HR partners, Black Mountain, who follow standard HR procedures to ensure our employment practices are in compliance with the law.

#### **Health and Safety Commitments**

- BDA will provide a working environment that is clean, safe, and promotes good health and well-being for all employees.
- We will maintain office spaces to safe working standards.
- We will carry out ergonomic assessments to ensure the risks of repetitive strain injury are mitigated.
- We will maintain our ISO 45001 certification.

#### **Working Conditions Commitments**

- We will ensure that all BDA employees have a healthy work-life balance
- We will outline hours of work in each employee's contract of employment.
- Working hours will be within legal limits and set with the agreement of each employee.
- We will offer flexible working opportunities.
- We will pay all employees fairly for their work and level of responsibility.
- We will ensure all pay is above minimum legal requirements.

#### **Career Progression Commitments**

- We will conduct performance reviews regularly, at least annually.
- We will follow a formal process to ensure a consistent approach to the measurement of individual performance.
- We will identify opportunities for training and offer courses to develop the skills of workers.
- We will ensure that career opportunities are discussed between employees and their managers to increase the chance of an employee's progression within the business.

#### **Freedom of Association Commitments**

- We will ensure employees are regularly engaged for their feedback on working conditions and business practices as part of day-to-day business operations.

- We will conduct company-wide employee experience surveys regularly using partner software by Qualtrics.
- We will provide colleagues with a formal opportunity to discuss work-related issues during performance reviews.
- We will ensure that staff are free to join trade unions and to organise themselves to take collective action.

### **Diversity and Inclusion Commitments**

- We will not tolerate any form of harassment or bullying from our employees, suppliers or contractors against their employees or from our staff to other 3rd parties.
- We will provide a neutral working environment in which no one feels threatened or intimidated.
- We will treat any discrimination or harassment as serious matters in line with our disciplinary procedures.
- We are committed to reflecting the diversity of the communities where we work and live, and feel a sense of responsibility to give back to them through inclusion and support.
- We will be a force for good, in the important fight for equality, inclusivity and justice.
- We will strive to create a culture and work environment that provides all employees equal access to information, career development and opportunity.
- We will build a culture that embraces equal representation.
- We are responsible and believe in our ability and position; to influence and help champion equal representation, and to select partners who share our commitment to diversity and inclusion.
- We will ensure that pay between men and women remains equitable; equal pay for equivalent work.
- We will address and provide remediation for any harassment issues raised

### **2025 Targets**

- 100% of staff to attend at least one diversity and equality training course per year
- Zero reports of discrimination
- Zero reports of harassment
- Zero staff injuries in the workplace
- Zero staff illness related to work matters
- 100% of new employees to receive health and safety training
- 100% of employees to receive a performance appraisal
- 100% of employees to receive skills training
- 100% of employees to be paid above minimum wage levels
- 100% of employees to be free to join trade unions

### **Responsibility and Review**

BDA's CEO and UK-based Directors are responsible for ensuring this policy is followed and is reviewed annually. Our HR partners, Black Mountain, are responsible for some of the day-to-day practices required to ensure this policy is followed.

Initial Date	22 <sup>nd</sup> September 2023
Latest Revision	12 <sup>th</sup> August 2024
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