



# BMMI Code of Conduct

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## OUR CODE OF CONDUCT

Our code of conduct outlines our guiding principles to help us truly live our values, protect our reputation, take responsibility for always acting ethically and to help us recognise and resolve potential challenges we might face in the workplace.

The code of conduct is meant to be used along with some of our other literature, including Book 1 and 2 of your welcome kit. Together, they help give us a comprehensive overview of how we are expected to act as part of team BMMI.

Beyond our commitment to comply with the law at all times, every one of us should be equipped with the necessary information to feel empowered to operate with the highest standards of business and personal ethics. We're always expected to practice fair dealing, and to display honesty and integrity when dealing with our colleagues, customers, shareholders, suppliers, regulatory authorities and competitors.

Remember, you are not alone! As a valued member of team BMMI, you have a range of support to help you make the right decisions and to live our culture to its highest potential. If you feel these standards haven't been met, or if you need access to policies or have any questions, please ask for guidance or voice your concerns with your manager, the Human Resources and Talent team or the Legal Affairs team.



## **BEHAVIOUR IN THE WORKPLACE**

Let's face it; we spend more time at work than we probably do at home. Most of us appreciate good energy and thrive on positivity! We should all strive to create a healthier and more inclusive working environment that is motivating and respectful at all times.

### **Attendance**

At BMMI, respecting each other's' time is an important part of our working culture, and so is fairness. That's why we follow a biometric attendance system to provide more accurate information. This helps ensure that keeping track of time keeping and attendance is increasingly fair and transparent. In order to continue on creating a more flexible, as well as efficient, working environment, we frequently monitor the system to ensure that it is being consistently used correctly by the entire team.

Similar to other policies, the Attendance Policy is updated frequently and in order to make sure you have the most relevant and up to date information, we expect all team members to frequently read policies and to comply with policies relating to their areas of business. For further information, please refer to the latest version of the policy.

### **Let's talk about etiquette**

Good etiquette means acting in a respectful and courteous manner at all times. This ensures a pleasant work environment and helps in protecting people's dignities. We should all play an active role in being role models when it comes to best representing our organisational values.

Bad manners are bad for the business, and to create a happy and healthy work environment, it is the responsibility of every employee to display good manners at all times. Acting with disrespect towards anyone you interact with or towards company properties is simply unacceptable.

### **Gossip and rumours – zero tolerance**

There are steps you can take to ensure that you don't play any role in creating a negative working culture. Make sure to stay away from gossip, inappropriate jokes, abusive speech or attempting to intimidate anyone. We all know that rumours can also create a truly toxic atmosphere. Whether about company operations, the management team, or other colleagues, they can spread very quickly and get out of hand. Before you know it, people are starting to believe rumours even if they were never true to begin with!

Also don't forget that information regarding someone's personal life is not for public disclosure and should not interfere with his or her professional dealings. The bottom line is rumours will not be tolerated.



***I heard rumours about a co-worker engaging in illegal activity at work but do not have any proof. What do I do?***

*If you suspect something suspicious going on, don't start rumours, but rather speak to your supervisor or manager. If you heard this rumour from a BMMI employee, advise them that rumour-spreading and gossip go against our Code of Conduct...or simply tell them you are not interested and to address their concerns with their manager.*

**Dealing with disagreements**

It's inevitable that a workplace disagreement might happen at one point or another. But always remember that good etiquette is integral to our culture. If you ever face a situation where a colleague is displaying bad etiquette, keep in mind that the right thing to do is not to reciprocate - as hard as that may sound! Breathe and try to remain calm and never raise your voice regardless of the situation. If the situation allows it, excuse yourself and get some space. Write down your thoughts and concerns and provide feedback at the right time. For example, "When you did or said this, I felt xxx". Listen to what the other person has to say and share the airtime together.

This all sounds wonderful but sometimes in the heat of the moment, staying calm and talking politely about our feelings is a lot more challenging. If a colleague insists on continuing to act in an unprofessional way that goes against our Winning Hearts culture, even after you have spoken to them, you should seek guidance from your manager or an HR and Talent representative. The worst move would be sharing with other employees what has happened and fuelling rumours.

Common courtesy, respect for everyone and rules of daily etiquette must be followed in the workplace to make sure we work cohesively and productively. This is not negotiable. It is your right as an employee of the BMMI Group to feel that you are respected and that your human dignity is acknowledged and protected at all times.

***A customer is being unreasonably rude and arrogant. What should I do?***  
*Politely excuse yourself and immediately speak to your supervisor or manager.*

**Intoxicants at work**

The consumption of alcohol, the use of illegal drugs or substances, or the misuse of prescription medication at work is strictly prohibited. Drugs of abuse, as described by the World Health Organisation, include but are not limited to cocaine, crack, heroin, marijuana, hashish, khat, LSD, opium, ecstasy, the misuse of prescription medication or any other related and/or unregulated substances.



## YOUR RIGHTS TO A SAFE ENVIRONMENT

We need to make this very clear: any form of harassment, abuse, discrimination and/or violence is not tolerated whatsoever and will result in immediate disciplinary action.

If you feel you are being harassed, abused, discriminated against, or treated with violence in any way at work, please speak up immediately. If you witness anyone else being harassed, please also report the issue to your manager or the HR Manager.

It is our collective responsibility to protect ourselves and our colleagues from any form of these vile actions that directly contradict our values, code and the laws in the countries in which we operate.

You have support, never forget that. This behaviour is not tolerated across the BMMI Group. Approach your manager, the HR and Talent team or the Legal Affairs team and report the issue immediately. You will get the help you need.

### Harassment

Harassment is not one-dimensional. It can be psychological (bullying or humiliation), racial, religious, or sexual, and includes making discriminatory, derogatory or sexist remarks. Use of inappropriate language against a colleague is also a form of harassment.

Please also be clear about this: we do not tolerate sexual advances of any kind in the workplace. A person is sexually harassed if he or she feels threatened, frightened, offended, angry or humiliated by another person's behaviour that is sexual in nature. For an event to be classed as sexual harassment, conduct must be uncalled for and unwelcome.

Examples of harassment can be leering or inappropriately staring at a person, extending compromising invitations and persisting when someone has refused you asking them out, sharing dirty jokes or displaying offensive material in someone's presence, making unwelcome comments about a person's private life, inappropriately touching or brushing up against a person on purpose or demanding sexual favours or trying to force a person to perform acts of a sexual nature.

### ***How do I handle uncalled-for attention from a BMMI Group employee?***

*Decline any inappropriate advances. Should these actions continue speak to your supervisor or manager immediately. Alternatively, you can also contact the HR and Talent team.*

### Violence

BMMI has a zero tolerance workplace violence policy and prohibits all kinds of violent behaviour including, but not limited to, physical assaults, fighting,



threatening, intimidation and the intentional or reckless destruction of company, employee or customer property. Any comments or behaviour that could reasonably be interpreted as intent to do harm will be considered a threat.

Any violent or threatening conduct must be reported immediately.

### **Non-discrimination & equal opportunity**

At BMMI, we believe that our strength lies in our diversity and that an inclusive work environment is the only way for us to keep progressively moving forward. We embrace and welcome all people whose talent and potential shine through.

Our **Equal Opportunity Policy** supports equal opportunities through fair and consistent methods of recruitment, retention, training, compensation and so forth. We hire people based on merit and on how much we believe they will attempt to live our Winning Hearts values. Promotions and transfers will be awarded based on performance and how much a team member has truly embraced our corporate culture.

We do not discriminate against any applicant for employment or any employee because of age, race, religion, caste, sex, disability, sexual orientation, social or economic status, pregnancy, or national origin. At BMMI, it's all about how you live and breathe our culture, your performance and your willingness to learn.

***My department is recruiting a new team member. I am concerned that they may be discriminating against specific candidates. Should I report this?***

*Yes, you should always raise any concerns that you have, especially of such nature, as we do not tolerate any form of discriminatory behaviour. We only make decisions based on merit, job-related skills and previous achievement. We do not make subjective decisions based on other unrelated characteristics. This applies to all the work we do, not just recruitment. All team members should constantly be treated without any form of discrimination. If you have any concerns, please report them to the HR and Talent department.*

***My line manager has been personally insulting and discriminating against people in my team, I know he/she wants us to perform well but this is affecting our morale. I'm hesitant to report it as it might make things worse. What should I do?***

*Any discrimination or intimidation is just downright unacceptable. Should you be in such a situation or witness violations first hand, be empowered to raise your concerns to the HR and Talent team.*

### **Compensation & benefits**

We strive to ensure that a fair and unbiased reward system is in place across the BMMI Group. Our HR and Talent team supports departments with planning, developing and implementing new and revised compensation strategies, as well



as policies and procedures, in order to effectively operate each business unit within BMMI.



## **YOUR WORKSPACE & RESPONSIBILITIES**

As a team, it's our collective responsibility to address any challenges that may arise in relation to unsafe behaviour and workspaces. This is why we expect everyone to take a proactive approach when it comes to the health, safety and security of all our stakeholders at any of our premises.

We strongly believe in the development of systems that support our contracts and subsidiary operations, as well as protect our people, customers and the environment. Our dedicated Integrated Management System (IMS) ensures that our internationally accredited standards are prioritised and successfully implemented in BMMI, as well as all other subsidiaries across the Group.

### **Health & safety**

Health and safety are a huge deal at BMMI. This is reflected by us achieving and maintaining our international standard OHSAS 18001 certification.

We're fully committed to protecting the health and safety of every single member of our team, our clients, our customers, the general public and the environment through our programmes and policies. This also includes protecting our property from damage or loss due to accidents or other causes.

Every member of the BMMI team should conduct their responsibilities in a manner that reflects these commitments. The protection of health and safety will always remain a primary goal. We encourage team members to constantly take a proactive approach. We can all be accountable for developing rigorous safety habits and helping prevent incidents by identifying common factors that may cause them. For further information, please refer to the Occupational Health & Safety Policy.

### **Alcohol & safety**

The sale and distribution of alcoholic beverages is one of our main business streams. This makes our commitment to raising awareness and ensuring that our team understand the nature of alcohol consumption and its effects, even more important.

### **Remember, no matter what, drinking and driving is a big no!**

If you are concerned about your levels of alcohol consumption or are worried you suffer from alcoholism or alcohol dependence, the team can assist you and look into options to get you the help you need. For more details, get in touch with the HR and Talent department or drop them an email at [hrcom@bmmi.com.bh](mailto:hrcom@bmmi.com.bh).

### **Investigation, reporting & disciplinary actions**

BMMI takes all suspected and actual violations of our code of conduct very seriously. We're committed to total confidentiality and a comprehensive



investigation of all accusations. We also commit to being as thorough and impartial as possible when dealing with investigations and decisions relevant to administrating the code or violations of our Winning Hearts culture. Investigations will be conducted using any methods appropriate, including using external agencies selected by the company, local authorities or cooperating companies or other causes.

At BMMI, fairness is a big deal, and team members will always have the opportunity to be heard prior to any final decisions being made. The results of investigations, final decisions and disciplinary actions taken will also be communicated with our Senior Leadership Group (SLG). All team members must understand that **proven** violations of the Code **will** result in disciplinary action. Violations of a more serious nature will result in suspension without pay, loss or reduction of increases, bonuses or indemnity, or termination of employment. Certain situations will be dealt with by referring to the local law. If you'd like more information on disciplinary actions, please refer to the **HR Disciplinary Policy**.

#### **You're in safe hands**

Rest assured that the confidentiality of your complaint, concern or inquiry is a priority, and BMMI will maintain the confidentiality of all complaints to the maximum extent possible.

It's important for all of us to understand that those who raise a complaint or concern or report a violation are protected from reprisal. Any threat, termination, compensation decreases or poor work conditions inflicted on an employee in retaliation will not be tolerated and will result in disciplinary action for the offending party. The above does not apply to allegations or information that are found to have been intentionally false and misleading. For more information, please refer to our **Grievance Policy**.

#### ***I am aware of illegal activity within my department but have not reported it for fear of losing my job. How do I proceed?***

*Do not fear retaliation. You are assured the upmost confidentiality and protection from reprisal. If you suspect something suspicious, report it to your manager or the HR and Talent team.*

*As always, if you have any questions regarding any of our policies, or to discuss concerns, report violations or potential violations of this Code, you are encouraged to either report it to your manager or a representative from the HR and Talent or Legal Affairs department.*



## **BUSINESS PRACTICES**

### **Confidential & propriety information**

There's always going to be some information that is not meant or designed for public disclosure and that belongs solely to BMMI. Some examples of this type of information includes items such as financial or technical data, plans for acquisitions or expansion, new principals, marketing campaigns, major management changes, personal information about employees or customers, major contracts, financing transactions, joint ventures, and other corporate developments.

As members of the BMMI team, we are expected to take the appropriate measures to protect this information at all times. This not only helps ensure that we maintain the integrity of our work, but in some circumstances it could also be illegal to share some information before it's appropriate. For example, information regarding new business ventures or financial standing should only be disclosed after it is made available to the general public.

To help protect the team and the business, keep this rule in mind: any information to be disclosed to outside parties and the media will be managed exclusively by the SLG, the Legal Affairs department and the Corporate Communications & CSR department.

In order to ensure the protection of our personal integrities and to avoid any legal ramifications, we have an obligation to protect any confidential and proprietary information of BMMI even after we are no longer an employee in the company.

### **Use of classified information**

A big part of information sharing across the Group includes our business and financial records, and as a transparent and ethical company, we need to ensure that these records are created, maintained and disposed of in accordance with our policies.

This applies to all our other information and records as well, including, timesheets, expense accounts, plans, reports or others.

Honesty is one of our core values. Integrity is a core component of our DNA. As a team, we are all responsible for ensuring we maintain accurate and complete records of our business activities.

By making sure that our information is accessible and organised in a manner that complies with our policies and legal requirements, we make our jobs easier, as well as protect ourselves.

We must also never engage in and always report any attempts by others to record inaccurate transactions or keep transactions off the company's books or



in any other documents provided to our external auditors, government agencies, or approved third parties.

We take our team's trust in us very seriously. Individuals' private and personal documents and data must always be kept with appropriate confidentiality. Personal identity documents such as passports and ID cards must always be kept safe when these are needed for administration purposes. They must not be tampered with, damaged or destroyed, and they must be returned to the individual as required. Failure to do this could result in disciplinary action.

### **Avoiding digital PR disasters**

We live in a digital age where information is shared at a crazy speed. We've all witnessed various PR disasters or have seen examples of how things written on the internet or on social media could be misunderstood, interpreted negatively or could spiral out of control, leading to a crisis!

As a modern and expanding global organisation, the majority of BMMI's brands have a prominent online presence. Please keep in mind that only authorised employees are allowed to publish content on digital channels affiliated with BMMI.

We also need to make sure that whatever we post complies with our policies, as well as the principles, ethics and values we discuss here. We also know that many of us love to share information about BMMI, or are sometimes approached by the media to talk about the Group, or one of our diverse businesses. This is why we have a dedicated team to help you out.

The Corporate Communications & CSR team has been trained to unify BMMI's message and to strengthen the perception of our brands.

We kindly ask all team members to not engage with the media on behalf of the BMMI Group or any of its subsidiaries unless you have been authorised or advised to do so by the Chairman, SLG, Head of Legal Affairs, or the Corporate Communications & CSR department head.

This will help ensure that the right message comes across and a coherent and unified image is portrayed in the media. Kindly also note that all media announcements or press releases must be approved in advance by the Corporate Communications & CSR team and the Legal Affairs department prior to publication.

When acting or speaking on behalf of the Group or one of our businesses, team members must under no circumstances take unfair advantage through the concealment, manipulation, misrepresentation of material facts, abuse of privileged information, or acting upon any other unfair-dealing practices.



This kind of practice is an affront to our values and there will be major consequences if it takes place.

***A colleague is making inappropriate statements on social media, what should I do?***

*Before you raise concerns, make sure what you've seen actually violates our social media guidelines. Statements made on our behalf should always align with our values. We encourage employees to take extra care when representing or discussing our brands online. When in doubt, seek the help of our Corporate Communications & CSR team.*

**A trusted partner**

Just as BMMI values and protects its own confidential and proprietary information, it's our policy to respect the confidential and proprietary information of others, including information we may have about our customers, suppliers, partners and employees.

**Our diverse stakeholders are the foundation of our success and we consider them a part of the larger BMMI family.**

As a provider of goods and services to our many customers, including national governments and international agencies, we must also respect and comply with their ethical standards and guidelines for our business practices.

Our commitment to our values, our DNA and our code of conduct is what has made us a trusted partner for **over 135 years**, and is what will help us to continue to thrive.

**Company assets**

A part of our responsibility as a team is to make sure we use BMMI Group's assets with integrity and in line with our collective interests and values at all times. Assets include our time and output at work, trademarks, reputation and name, as well as more tangible things such as equipment, vehicles, computers, software, copy machines, printers, information, stock and money.

All team members should protect company assets at all times and ensure their responsible use. Any negligence, theft, misuse or waste of company assets is strictly prohibited and will result in immediate disciplinary action.

As members of the team, we should take pride in our products and understand that if we want them, we have to buy them first. We also need to safeguard the products in our shops, warehouses, offices or any of our facilities. Pilfering, embezzlement or any type of misappropriation of funds or goods will be dealt with by referring to the local law.

If you feel the need to use any of the Group's assets outside of your official responsibilities at BMMI, please keep in mind that you must obtain permission



from the respective and relevant divisional manager first, whether the assets include information, work products, trademarks, or other.

We understand that sometimes, you might want or need to use some office equipment for personal reasons. We just kindly request that you be responsible if you use it for personal purposes, as you need to ensure it will only involve minimal additional expense to BMMI and that it won't interfere with your or that colleagues' work!

***What should I do if I see a colleague intentionally writing off good products as damaged or expired, just to take them home?***

*You must let them know that this is unethical and against our Code of Business Conduct. If they don't stop, bring it to the attention of their supervisor or manager.*

**BMMI Group brands & guidelines**

As a diverse group of companies, our brands' reputation is very important which is why we each need to take responsibility for driving our mission and acting with integrity in all situations.

Our brands are at the core of our business and it is crucial that we take pride in all of them, as well as the brands we represent. We must properly use our brands' names, logos and trademarks, including those of our principals, at all times.

These images need to be reproduced accurately and our intellectual property rights (trade secrets, designs, copyrights, logos, patents, domain names, etc.) must always be protected. We are all responsible for ensuring that they are not copied without our agreement.

If your job responsibilities include being directly involved in the creation of new brands or product designs for BMMI, kindly ensure that you get in touch with the Corporate Communications & CSR team ([communications@bmmi.com.bh](mailto:communications@bmmi.com.bh)). The team can help guide you to our latest brand guidelines and help you develop creative solutions.

Additionally, the Legal Affairs department can help you protect new ideas, gain permission from third parties to use their intellectual property and report raise concerns when suspecting other businesses to have breached our intellectual property rights.

**Watch out for copyrights!**

To avoid violations of any copyright laws and to respect and protect the brands of others as much as our own brands, we all need to make sure that we have obtained documented authorisation and permission prior to using or reproducing any materials that we do not own the rights to.



Copyrighted works include, but are not limited to, printed articles from publications, TV and radio programs, videotapes, music performances, printed photographs, digital photographs, training materials, manuals, documentation, software programmes, databases, CDs, and Web pages.

### **Conflicts of Interest**

When it appears that a person's private interests interfere with the interests of the company, a conflict of interest arises. This can happen when a team member takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest may also arise when an employee or a member of his or her family receive improper personal benefits as a result of his or her position in the company.

If you have any ownership in shares of an organisation, supplier or competitor that deals directly with BMMI, you need to remove yourself from the decision making process. Avoid doing business on behalf of BMMI with a company that you or a family member have financial interest in.

It's important to remember that conflicts of interest are not only bad for our reputation, but they are also a very serious matter professionally and sometimes even legally. Conflicts of interest are **strictly prohibited** under our company policy.

If any employee has or faces a potential conflict of interest, the situation should be immediately and fully disclosed by the employee to his or her manager and the Head of Legal Affairs, who are then required to seek the approval of the CEO. These conflicts of interest can really affect our image and even your professional reputation. Decisions should be made and people should be chosen because they deserve to be, not because of who they know or the relationships involved. Simply put, this is not the way we do business at BMMI.

### ***My department is recruiting for a position that I think a relative or someone I know will be perfect for, is it acceptable if I recommend someone for the role?***

*Yes, if your relative or acquaintance has the necessary qualifications, you can recommend them, as long as you don't have the direct authority to determine employment. Declare any relationships to avoid suspicions of conflict of interest.*

### **Insider trading**

If you don't already know this, you need to: insider trading is a serious matter legally, ethically and professionally.

Insider information is information that a reasonable investor would consider important in making investment decisions and that is non-public, or has been public only for a very short time.



This includes, for example, contracts or proposed contracts with customers or suppliers, proposed acquisitions, joint ventures or divestitures, new products or services and regulatory approvals or disapprovals or the financial performance of the Group and its subsidiaries.

BMMI, like many public companies, has adopted specific trading restrictions to guard against insider trading. These restrictions apply to all BMMI team members and other related parties as defined by the law. If you have any concerns or suspect an employee of insider trading please consult our Legal Affairs team immediately.

**I heard that BMMI will sign a big new contract of a publically traded company. Can I purchase shares before the contract is signed?**

No, buying shares in BMMI or an affiliated company based on information obtained from insider trading is illegal. You are not allowed to reveal inside information to anyone else or encourage them to deal on that basis even if you will not profit from it.



## FROM THE OUTSIDE IN

Just as we expect the best from every single one of our team members, and trust that we will live by the culture we have fostered here at BMMI, we also expect that we all maintain the highest standards of ethics, transparency and fairness when dealing with our customers, suppliers and competitors.

We take a strong stance against unfair advantage of any of these parties through acts of manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other form of unfair practices.

### **Anti-trafficking**

We will not tolerate any employees engaging in illegal or unethical business activities under any circumstances. This includes knowingly engaging in business activities with individuals or organisations involved in illegal or unethical activities, including human trafficking, commercial sex, trade in drugs or weapons, or other goods that may be illegal in our countries of operations.

Forms of trafficking include sex trafficking in which commercial sex acts are induced by fraud or coercion. The transportation, recruitment, provision, or obtainment of a person for labour or other services, enforced through force, fraud or coercion for the purpose of subjection to involuntary servitude are also forms of trafficking.

BMMI maintains zero tolerance for any violations of the above and employees must immediately report any actual or suspected violations to the Legal Affairs Department. Any employee who fails to report violations or engages in such activity will be subject to immediate disciplinary action. These actions not only violate the dignity of others, but they directly contradict our values and our code, as well as the law.

### **Anti-corruption & anti-bribery**

BMMI has always been ahead of the curve, establishing itself as an industry leader in the region. We hope to constantly challenge the status quo and to set the example for other players in the field. This is why we always strive to uphold our reputation and commitments to take a stance against corruption of all forms including fraud, extortion and bribery.

Just to clarify, a bribe is anything of value that is intended to imply obligation in the recipient, including gifts, money, shares, services, entertainment or even offers of employment. All team members must understand that BMMI does not condone, under any condition, the offering or receiving of bribes in any form, including improper or facilitating payments. BMMI will not tolerate any violations of any laws governing the countries in which we operate. All of us must strictly comply with national and local laws.



We must also only conduct business with those who have similar ethical standards as ours. BMMI will not engage or work with any individuals or organisations that engage in bribery or corrupt practices. We have set proper standards of accounting for all financial transactions including the payment of gratuities, fees, commissions and maintaining proper record keeping. Our internal controls ensure that all the above transactions are handled properly and are fully recorded in a transparent manner.

BMMI prohibits all actions of fraud including, but not limited to, the appropriation of funds or other indiscretions including misuse of funds, embezzlement, fabrication of company records or financial statements, forgery of company checks and drafts, unauthorised handling of company transactions and the misappropriation of any company, employee, supplier or customer assets. It is crucial to understand that any improper activity in any country in which we operate can have serious implications on the whole BMMI Group globally. If you find yourself in a situation where you are unsure if certain actions are considered to be a violation, you must contact our Legal Affairs department immediately. This helps protect you, the rest of the team and the BMMI Group as a whole.

***One of our suppliers has been found to pay their workers below the legal wage. What should be done?***

*Contact the supplier to discuss the situation. Workers' employment conditions should be updated and an agreement should be reached with the suppliers.*

**Supplying ethically**

We can't stress enough that fairness and integrity are crucial elements of what makes us who we are. When choosing suppliers, we should always keep the collective interest of BMMI in mind, and we can do this by ensuring we constantly have honest and transparent business interactions with all our suppliers, contractors and consultants.

We choose our suppliers based on relevant criteria, such as qualifications, service quality, competitive prices, ethics, and reputation. Where possible, BMMI will support marginalised suppliers including minorities, women and so forth, in order to truly embed socially responsible procurement practices.

Keep in mind that anyone responsible for buying, leasing or contracting products or services on behalf of BMMI must ensure objectivity and safeguard the interests of BMMI and its customers.

We expect and need to ensure that our suppliers conduct business on our behalf in compliance with applicable laws and regulations, including health and safety principles, and in accordance with the highest human rights standards.



***Are there any specific things I should consider when choosing or working with external consultants, suppliers or vendors?***

*Yes, always make sure that the way they do business does not violate our Code of Business Conduct. We only associate with external entities who share similar values and who believe in an ethical approach to doing business. If you have any concerns or questions, please contact the Corporate Communications & CSR department head.*

**It's time for gifts!**

We can only accept or offer appropriate gifts or payments. The nominal value for each of our locations is outlined in the Finance Manual, under the Receiving Gifts section. The key factor here is to make sure we keep an arm's length in relationships. Any kind of excessive or lavish gifts that could even cause an appearance of influencing any business decisions must be avoided at all cost.

You must make sure to understand the legal and ethical issues associated with gifts and entertainment and how they affect our relationships and reputation with customers, suppliers and the public. Never accept or give out cash or cash equivalent gifts without seeking the approval of your manager or Legal Affairs department.

Never accept gifts or entertainment that may be confused as a bribe or that might insinuate business expectations in return. Disregarding this prohibition will result in immediate disciplinary actions.

Be aware that the decision to approve payments or to accept gifts or entertainment should only be made in compliance with legal requirements and ethical considerations, and with the involvement of Senior Management. Be cautious and consult the Legal Affairs department before giving gifts to public figures/authorities.

Please note that the above does not apply to occasional business meals, which can be reciprocated, and which are necessary due to the nature of some of our businesses. Business gifts and entertainment that fall under the nominal value for each country we operate in, are courtesies designed to build goodwill and sound working relationships among business partners.

**Political Contributions**

Some of the countries in which we operate enact stringent laws regulating political contributions, activities and gifts. This is meant to prevent improper influence over public officials. Political contributions to governmental entities or individuals could be seen as improper payments.

This can result in serious legal implications for you and for BMMI. As such, all employees should strive to become familiar with laws governing certain activities and directly consult the Legal Affairs Department before engaging in them.



The BMMI Group will always comply with applicable laws regulating political influence and contributions. No employee or any third party representing BMMI in governmental matters shall apply any implied or direct pressure on any employee to decide whom personal political contribution is made towards.

Employees and other third persons who represent the company in political and governmental matters must comply with all laws that regulate corporate participation in public affairs. Under various statutes, certain conduct, which is permitted and encouraged for individuals, is prohibited on the part of corporations. It is the company's policy to comply fully with these prohibitions.

No contribution of any company property, funds or services can be made in support of any political party or official in the countries in which we operate or in any other country, without approval of our Head of Legal Affairs. The Legal Affairs department will verify whether the proposed contribution is proper and legal.

***What do I do if I am offered a gift by a supplier?***

*You may accept gifts of a nominal value such as a company branded t-shirt, pen or calendar. Politely decline any gifts of a significant value and no clear business justification such as a digital camera, for example. The nominal gift value for each of our locations is outlined in the Finance Manual, under the Receiving Gifts section.*

***What exactly is considered a "valuable" gift?***

*Any item that may be of a significant monetary value, for instance a mobile phone or a laptop, is a "valuable" gift. When in doubt, consult with your manager.*

***Is it acceptable to allow a supplier to pay for my meal, or take me out to an entertainment event?***

*Yes, occasional business meals or entertainment are acceptable.*

**Getting official**

Doing business with the government is not always the same as doing business with private parties.

Activities that might be appropriate when working with private sector customers may be improper, or even illegal, when a national or local government is our customer. There are special rules governing appropriate conduct in dealing with local or foreign governments that differ from rules for dealings with non-governmental companies.

Keep in mind that the issue of gifts and gratuities may have legal implications when a government entity is involved, and serious consequences can result from mishandling these relationships.



We must never promise or offer to give anything of value particularly when dealing with government, military or other public officials. Political donations or charitable contributions to this group could be perceived as bribes. If our business contacts ask for donations on the company's behalf, we should always be particularly cautious, especially if the request comes from them directly.

As a strict rule, you may not offer or provide government employees with any gift, gratuity or anything of value, including meals or travel, unless previously authorised by the CEO and the Head of Legal Affairs.

***I was advised to pay a gratuity to government officials to get some paperwork processed, what should I do?***

***BMMI employees must not provide gratuities to officials to ensure the execution of any duties. Bribery is illegal and strictly prohibited. Please immediately seek advice from the Legal Affairs team regarding such concerns.***



## SOCIAL IMPACT

Our business activities affect the lives of thousands of people across the globe. Deeply rooted within our culture is the conviction that the countries and communities in which we operate in should benefit from our presence, just as much as we continue to benefit from them.

### Corporate social responsibility

Over the years, our team members have proven again and again that CSR is crucial and that working for an ethical and sustainable company is a priority. At BMMI, we also recognise that in order to truly succeed in building long-term shareholder value and to safeguard continued growth, we must ensure our business strategy is aligned with sustainable values. This includes balancing economic performance with environmental and social stewardship.

BMMI values and implements sustainable strategies to guide in our business and social relationships, the management of our team, structures, communities where we operate, and economic performance. Some of these strategies include sustainable procurement, employee and supplier diversity, training and development, human rights, anti-corruption, health and safety, and charitable donations.

### Nourishing Life:

#### BMMI's core sustainability policy

For BMMI, social responsibility and sustainability extend beyond compliance. It is not about mitigating harm, but rather adding real value to all who interact with our company.

With a heavy involvement in the food industry, we see ourselves as a company that nourishes the lives of our customers, our employees, our customers, the communities in which we operate and our planet. This is why we named our core sustainability and CSR policy: Nourishing Life.

Nourishing Life is driven by three over-lapping themes:

**Truth, Zero Waste, and Wellbeing.**

### TRUTH

- First and foremost, being true to **OUR VALUES** in all of our interactions with each other and our stakeholders.
- Being truthful and **TRANSPARENT** with our employees, customers, communities and other stakeholders about our products, activities, their impacts, and how we are working to improve.
- Being truthful in the way we **OPERATE**: lawfully, ethically, with integrity, and without misrepresentation or corruption.
- Being true to **OURSELVES**: the personal vision and potential we each hold.



- Being **AUTHENTIC LEADERS**, who are genuine and self-aware, who cultivate honest relationships, and make decisions on an ethical foundation, to lead with our hearts and minds.

## ZERO WASTE

- Not wasting precious **NATURAL RESOURCES** like water, raw materials, food, energy, and entire habitats and eco-systems.
- Not wasting **TALENT** or **DREAMS**. The talents and dreams of our employees, the talents and dreams of youth, or the talents and dreams of the communities and stakeholders with whom we interact.
- Not wasting **BUSINESS RESOURCES**—our money, time and energy, by making our processes more efficient.
- Not wasting **OPPORTUNITIES**. Equal opportunities for our employees to excel. Business opportunities that serve some of the most pressing societal needs— like food security and affordable and nutritious food. Opportunities for local communities. And for diverse suppliers.

## WELLBEING

- The physical, emotional and mental wellbeing of our **EMPLOYEES**, as well as their health and safety.
- The wellbeing of **HUMANS**, including migrant workers, children, and the rights of all humans to a life of dignity.
- The wellbeing of **LOCAL COMMUNITIES**. Their economic health, social and environmental health, and the physical health of individuals in those communities.
- The wellbeing of our **CUSTOMERS**: food safety, providing healthy products, and educating our customers on the importance of proper diet and nutrition.
- The wellbeing of our **PLANET EARTH**: enriching its biodiversity, replenishing natural resources, and working to raise the environmental standards of our products and services.

## Equal opportunity

Identifying high performing and high potential talent, attracting more of it, and retaining it, can be a challenge for an organisation of our size.

Nonetheless, BMMI makes an effort to hire from local communities and disregards tribal, ethnic, sect, origin or cast discrimination in employment.

We employ around 40 nationalities overall and the average nationalisation rate for local staff is 74%, reaching up to a 100% in some countries of operation.

## Developing the future

One of our core focuses is centred on education. Our Young Leaders Program, (YLP), helps unlock the potential of young minds and empowers local youths to



make a positive personal contribution, in order to progress their careers and leverage their potential. BMMI also tries, wherever possible, to employ, train and develop young students and local talent in the countries in which we operate. Our team is committed to have a role in constantly fostering talented, equipped and innovative generations to come.

### **The environment**

BMMI is fully committed to conducting our business in a manner that protects the environment. The entire BMMI team is expected to support every effort to maintain a leadership role in protecting the environment from negative consequences or impact.

Under the IMS department, an environmental aspects register assesses more than 60 activities impacting the environment, as well as their significance, any legal requirements and preventative measure to control these aspects by location. We are committed to constantly monitor, measure, and reduce our environmental impact.

Our environmental responsibilities include properly storing, handling and disposing of hazardous and other waste.

We are also solidly committed to complying with laws regarding clean air and water and energy saving. When it comes to sustainability, we see ourselves as industry leaders and we aim to constantly seek new, innovative and alternative ways to minimise waste and prevent pollution.

We consider it our responsibility to be proactive in reporting any hazards or possible environmental risks. As members of the BMMI team, we're expected to immediately and carefully report any situation that might not seem right or potentially breaching regulation.