

SUPPLIER CODE OF CONDUCT

Introduction

1. Purpose

BakerHicks is committed to acting with openness, honesty and integrity in all areas of its business, while complying with the highest ethical standards.

For the purposes of this Supplier Code of Conduct ("Code"), "Supply Partners" refers to suppliers, contractors, subconsultants, distributors, and any other organisations that provide goods or services to BakerHicks, whether directly or indirectly.

Our suppliers make a significant contribution to our sustainable growth and overall success. This Code of Conduct sets out the responsibilities that Supply Partners must follow to ensure business is conducted in an open, ethical, and responsible manner. It explains your obligations as a Supply Partner to BakerHicks, helping to ensure compliance with the law and alignment with our values.

BakerHicks promotes innovation and social sustainability to ensure the long-term success of the company and its stakeholders. For this reason, we require strict adherence to legal and ethical principles relating to working conditions, environmental protection, safety, health and management systems.

2. Mission and fundamental values

Our Purpose is to deliver creative design, engineering and project delivery solutions together with our clients. Shaping a healthier, more sustainable and safer world. Our Vision is to be the leading sustainable design, engineering, and project delivery business in our chosen markets.

Our Purpose is supported by a core value that we act responsibly to do the right thing. For us, sustainability means creating added value simultaneously on two fronts: social responsibility and economic performance. We believe that sustainability involves a commitment to meet the needs of the three most important pillars - people, the planet and business success. This underpins all our activities and forms the foundation of this Code of Conduct. It sets clear expectations for how we conduct our business and how we collaborate with our Supply Partners.

3. Mutual commitment

We believe that true sustainability depends on the active participation of all our Supply Partners. Our approach is underpinned by Environmental, Social and Governance (ESG) principles to manage risks and opportunities linked to sustainability, and we expect all to uphold the same standards.

We therefore expect our Supply Partners to demonstrate their willingness and commitment – also on behalf of their subsidiaries and group companies – to comply with this Code, and to apply its principles consistently, both locally and throughout their wider supply chain.

Supply Partners need to be aware of, understand, and comply with relevant policies of BakerHicks, which are aligned to the UK Corporate Governance Code. Supply Partners are expected to have policies no less onerous than those of BakerHicks in place.

Effective implementation of this Supplier Code of Conduct is only achieved through dialogue with our Supply Partners, allowing us to continuously improve our business activities.

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4. Compliance

We expect our Supply Partners to take a proactive approach to implementing and complying with the standards set out in this code.

This includes the collection and evaluation of adequate and up-to-date information, the setting of measurable goals and targets, and the regular monitoring and review of progress. This also includes the use of all resources and skills appropriate to the task.

BakerHicks expects everyone associated with our Supply Partners to report any actual or suspected violation of this code. Concerns should be raised directly with their usual BakerHicks contact in the first instance. If a party feels unable to do this, they may raise the matter using the BakerHicks Raising Concerns helpline. All calls are handled by Safecall, an independent organisation with impartial staff trained to manage these types of concerns. The service is available 24 hours a day, 7 days a week, and can be contacted on 0800 915 1571 or online at www.safecall.co.uk/report.

5. Emissions reporting and reduction

Supply Partners are expected to support BakerHicks' commitment towards sustainability and net zero targets, aligned with recognised industry standards. The following requirements set out our expectations for the proportionate management of greenhouse gas (GHG) emissions associated with operations and the goods and services provided to BakerHicks.

Recognising that Supply Partners operate at different levels of impact and carbon management maturity, BakerHicks expects Supply Partners to demonstrate ongoing progress and continuous improvement, including the development and use of appropriate emissions data focused on areas of greatest impact.

BakerHicks will engage with Supply Partners from time to time on sustainability initiatives and data requests to support these objectives.

5.1. Emissions measurement and reporting

Where reasonably practicable, Supply Partners are expected to measure and disclose their GHG emissions on an annual basis to BakerHicks, or via agreed reporting mechanisms, using the GHG Protocol or an equivalent recognised standard.

This should include Scope 1 (direct emissions) and Scope 2 (indirect emissions, tracked using location-based and/or market-based methodologies). Supply Partners should ensure that reporting methodologies, organisational boundaries, assumptions, and data sources are clearly defined and applied consistently over time and presented in a transparent manner.

5.2. Scope 3 emissions

Supply Partners are encouraged to identify and understand Scope 3 emissions in their supply chain associated with the goods or services they provide to BakerHicks, and to seek to quantify these where feasible. Supply Partners with greater emissions impact or influence over carbon outcomes, reflecting the nature, scale, and carbon intensity of their activities, are expected to develop this capability over time. Where Scope 3 emissions data is not yet available, Supply Partners should define and maintain a plan, including indicative timelines, to develop this capability.

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5.3. Data quality and assurance

Supply Partners must ensure that emissions data is reliable, traceable, and supported by appropriate evidence where reasonably requested. Supply Partners are encouraged to obtain independent third-party verification of emissions data, for example in accordance with ISO 14064 or an equivalent standard.

5.4. Emissions reduction and targets

Supply Partners are expected to demonstrate ongoing efforts to reduce greenhouse gas emissions, and improve environmental performance where appropriate, based on the scale and impact of their activities and as reasonably determined by BakerHicks. This should include setting measurable carbon reduction targets, developing carbon reduction or net zero strategies, and monitoring and reporting progress on a regular basis. Supply Partners are encouraged to align targets with recognised frameworks such as the Science Based Targets initiative (SBTi).

5.5. Alignment with recognised frameworks

Supply Partners are encouraged, where appropriate to the scale and impact of their activities, to align their approach to the management and reduction of greenhouse gas emissions with recognised sustainability and carbon management frameworks such as PAS 2080, ISO 14001, SBTi, EcoVadis, CDP, or similar ESG assessment platforms. Supply Partners should be able to provide details of relevant certifications, ratings, or participation where reasonably requested.

5.6. Data provision and engagement

Supply Partners are expected to support BakerHicks in meeting its sustainability reporting obligations and client requirements. This may include, where reasonably requested and appropriate to the nature and impact of the goods or services provided, the provision of relevant emissions and sustainability data, completion of questionnaires or assessments, and participation in supplier engagement or carbon reduction initiatives.

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Core values and total commitments

1. Employees and service users

1.1. No discrimination

Supply Partners shall refrain from any form of harassment or discrimination based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and any other basis protected under local laws, including the Equality Act 2010 and the Worker Protection Act 2023.

1.2. Fair treatment

Supply Partners must ensure that no form of harsh or inhumane treatment occurs in the workplace. This includes sexual harassment, sexual abuse, corporal punishment, psychological or physical coercion, verbal abuse or any other threatening behaviour. All conduct must comply with the Equality Act 2010 and the Worker Protection Act 2023, plus any other applicable laws and regulations that may apply.

1.3. No forced labour or child labour

Supply Partners must protect the human rights of all workers and ensure they are treated with dignity and respect. Supply Partners shall prohibit all forms of forced labour and child labour and act in accordance with International Labour Organization (ILO) Conventions 138 and 182, the ILO Protocol on Forced Labour, the UN Convention on the Rights of the Child (Article 32), and all applicable national laws and regulations, including the Modern Slavery Act 2015 and the Employment Rights Act 2025.

1.4. No recruitment fees or document retention

Supply Partners must not charge workers any recruitment-related fees, including fees for travel, medical checks, or documentation, and must not retain workers' passports or personal documents. Labour agencies and third-party recruiters must be thoroughly vetted and regularly monitored.

1.5. Working hours, wages and benefits

Supply Partners must comply with applicable laws on maximum working hours, rest breaks and rest days, overtime, wage transparency, and minimum wage compliance.

1.6. Freedom of association

Supply Partners shall respect the rights of workers to freedom of association and to engage in collective bargaining, in accordance with applicable laws and regulations.

1.7. Fair compensation

Supply Partners must provide fair and lawful compensation in line with applicable wage regulations and collective bargaining agreements, ensuring that workers are properly and appropriately rewarded.

1.8. Reporting concerns

Supply Partners must maintain effective and confidential grievance and whistleblowing mechanisms that enable workers to raise concerns without fear of retaliation. Workers should normally use the Supply Partner's internal reporting channels in the first instance. However, where a concern relates to BakerHicks, its personnel, its projects, or where a worker feels unable or unsafe to use internal

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channels, it may be raised directly with the BakerHicks Raising Concerns helpline, operated independently by Safecall (available 24/7 at 0800 915 1571 or www.safecall.co.uk/report).

Supply Partners must ensure that all workers – including temporary, agency, and subcontracted workers – are informed of the BakerHicks Raising Concerns helpline as an escalation route. Supply Partners must maintain evidence of this communication and provide it to BakerHicks upon request.

1.9. Training and competencies

Supply Partners must maintain training programmes that ensure its workers have the necessary knowledge, skills and competencies to meet the requirements of this Code and provide evidence of training upon request.

2. Business practices

2.1. Waste

Supply Partners shall establish and maintain procedures, in accordance with applicable legislation, for the safe handling, storage, transportation, use, and disposal of waste. Supply Partners are required to conserve natural resources, avoid the use of hazardous substances wherever possible and promote measures for waste reduction, reuse and recycling.

2.2. Health and safety

Supply Partners must apply strict guidelines regarding health and safety. The aim is to create an accident and injury-free work environment and to prevent absences resulting from business activities. Supply Partners shall ensure that no work is undertaken whilst workers are impaired due to drugs (whether illegal or not), other substances, or alcohol.

At all levels, Supply Partners must actively identify and eliminate unsafe situations and work continuously to improve the health protection of their employees in line with the Health and Safety at Work Act 1974. Supply Partners must implement documented health and safety management systems that include, as a minimum, fire and emergency evacuation plans, first-aid training and equipment, machine guarding and PPE, incident and near-miss reporting and include regular risk assessments.

2.3. Confidentiality and data protection

Supply Partners need to ensure the confidentiality of all information received and comply with the terms of any confidentiality agreement with BakerHicks. They shall protect the data protection rights of BakerHicks, its employees, and any other data subjects in accordance with the Data Protection Act 2018 and all applicable data-protection laws.

Supply Partners must notify BakerHicks immediately, and in any event within 24 hours of becoming aware of any actual or suspected data breach affecting BakerHicks data. They must maintain cybersecurity measures appropriate to the type, sensitivity, and volume of data processed.

2.4. Transparent accounting

Supply Partners must ensure that all accounts, records, and supporting documents are accurate, complete, and truthful, and that they clearly reflect the nature and substance of the underlying transactions.

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2.5. Business continuity

Supply Partners must regularly review, test, and update their business continuity and disaster recovery plans to ensure resilience and minimise disruption to BakerHicks projects, and provide copies upon request.

2.6. Hazard information

Supply Partners must provide accurate and up-to-date safety information for any hazardous substances used or handled during the delivery of goods or services, including pharmaceutical compounds and intermediates. This information shall be made available to all affected workers to support appropriate training, safe handling, and protection from potential hazards.

2.7. Documentation

Supply Partners shall maintain complete and accurate documentation to demonstrate compliance with all requirements of this Code and with all applicable laws, regulations and standards. Copies shall be provided to BakerHicks on request.

2.8. Continuous improvement

Supply Partners must demonstrate continuous improvement by setting performance targets, implementing improvement plans, and taking necessary corrective actions. This includes addressing findings from internal and external audits, inspections, and management reviews.

2.9. Economic sustainability

Supply Partners should conduct all sales and contract negotiations with BakerHicks through the relevant BakerHicks commercial contact. Where appropriate, Supply Partners are encouraged to propose measures that create added value for BakerHicks and support competitive advantage, such as cost reductions or efficiency improvements.

2.10. Environmental impact

Supply Partners must ensure and demonstrate continuous improvement in environmental protection, including minimising the use of raw materials, energy, emissions, product releases, noise and waste, and reduction of dependence on natural resources and hazardous substances through the issuance of clear targets and optimisation strategies, aligned to the UN Paris Agreement 2016.

2.11. Product stewardship

In accordance with the principles of product stewardship, Supply Partners shall identify risks and environmental impacts associated with their products and services during the production, distribution and transport processes and throughout the product life cycle. They shall look for ways to minimise these risks and impacts. In this context, suppliers share the necessary knowledge, skills and experience with their own suppliers, customers and other parties.

2.12. Information

Supply Partners shall provide clear, accurate, and appropriate information on the environmental, social, and safety impacts of the goods, services, and activities they provide, in accordance with applicable laws and regulations. Where relevant, this includes transparency about materials, production processes, service delivery methods, and any associated risks.

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2.13. Law and regulation

Supply Partners must operate in full compliance with all applicable international, national, and local laws and regulations relevant to their activities. Where higher or more stringent standards apply than those required locally, Supply Partners must comply with the stricter requirement.

2.14. Free and fair competition

Supply Partners must uphold the principles of free and fair competition and comply with all applicable competition and antitrust laws in every region in which they operate. Supply Partners shall implement appropriate internal guidelines and controls to prevent anti-competitive behaviour.

2.15. Embargoes and commercial law

Supply Partners shall comply with all applicable commercial laws, regulations, codes and sanctions, embargoes, and export controls imposed by the United Nations, relevant national governments, or relevant supranational bodies. Supply Partners must maintain internal processes and controls to ensure effective compliance with these requirements.

2.16. Health and safety for local residents

Supply Partners shall systematically and periodically assess the impact of their emissions and waste in connection with their regular activities, either independently or through an external party. These results shall be documented as required by law.

3. Standards of behaviour**3.1. Legal and customer requirements**

Supply Partners must comply and adhere to all applicable laws, regulations, standards and relevant customer requirements.

3.2. Corruption

BakerHicks does not tolerate fraud, bribery, or other forms of corrupt business conduct, and supply Partners shall act in line with the Bribery Act 2010, the Fraud Act 2006, the Economic Crime and Corporate Transparency Act 2023, and any other relevant laws or regulations.

Supply Partners shall refrain from any form of corruption, including extortion and active or passive bribery. They must also ensure that their own supply partners meet these requirements.

3.3. Conflicts of interest

Supply Partners shall avoid any actual, potential, or perceived conflict between their own interests and those of BakerHicks, its customers, or other Supply Partners. Supply Partners must promptly disclose to BakerHicks any conflict of interest, including situations where Supply Partner employees or their close associates have a financial or other personal interest in the activities of the Supply Partner, BakerHicks, or relevant clients.

3.4. Gifts

Supply Partners will not offer or accept any financial or other advantage with the intention of inducing improper conduct. Any gifts offered, whether accepted or not, shall be recorded. Any concerns of bribery or corruption should be raised directly with their usual BakerHicks contacts in the first instance. If a party feels unable to do this, they can raise the matter using the BakerHicks Raising

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Concerns helpline. All calls are taken by Safecall, an independent organisation with impartial staff trained to handle these types of calls. The service is available 24 hours a day, 7 days a week and can be contacted on 0800 915 1571 or online at www.safecall.co.uk/report.

3.5. Innovation

BakerHicks is committed to continuous improvement and encourages innovative approaches, technologies, and practices within its supply chain to enhance efficiency, reduce costs, mitigate risks, and improve overall performance.

Supply Partners should support these efforts by informing BakerHicks of relevant innovations, improvements, or new solutions that could benefit shared projects. Any such information must be handled in accordance with BakerHicks' confidentiality and intellectual property requirements

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