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Shelby Group International Modern Slavery Report For Fiscal Year 2025

I. Reporting Entity Information

Legal name of reporting entity: Shelby Group International, Inc. ("Shelby Group")

Financial reporting year: January 1, 2025, through December 31, 2025

Business number(s), if applicable: 62-1237127 (US-FEIN)

Sector/industry: Manufacturer and supplier of personal protection equipment.

Location: West Collierville, Tennessee

II. Requirement (a) – Structure, activities and supply chains

Structure & Activities

Shelby Group does business under the name MCR Safety. MCR Safety is a leading Personal Protective Equipment (PPE) provider of work gloves, safety glasses, safety goggles, face shields, safety clothing, welding gear, chemical protection, and FR clothing. Shelby Group also does business under the name Tingley. Tingley Inc. is a leading safety equipment provider for overshoes, boots, waterproofing, high-visibility and flame-resistant clothing. Shelby Group International acts as a non-resident importer and sells goods into Canada. Further information can be found on our websites: https://www.mcrsafety.com/en/about-mcr & https://www.tingleyrubber.com/

Supply chain

Please see pages 3-4, of the 2025 Bunzl plc Modern Slavery & Human Trafficking Statement ("Bunzl Statement") for further information on Shelby Group's supply chain. The Bunzl Statement is included as Exhibit A, and is incorporated into this report in full, as applicable by reference.

III. Requirement (b) – Policies and due diligence processes

Please see pages 8-9 of the 2025 Bunzl Statement for information on the policies and due diligence processes applicable to the Shelby Group.

IV. Requirement (c) – Forced labour and child labour risks

Please see pages 5-7 of the 2025 Bunzl Statement for information on Shelby Group's risk profile on forced labour or child labour and the efforts the Bunzl Group, including the Shelby Group, has taken to assess and manage that risk.

V. Requirement (d) – Remediation measures

For more information on the annual audits and the audit for the 2025 financial year, please see pages 12 of the 2025 Bunzl Statement. The 2025 Bunzl Statement includes measures taken by the Bunzl Group as a whole. Shelby Group is not aware of any instances of forced or child labour during the past fiscal year. As such, we did not take any specific measures.

VI. Requirement (e) – Remediation of loss of income

The Shelby Group was not aware of any instances of forced or child labour during the past fiscal year. As such, we did not take any specific measures.

VII. Requirement (f) – Training

Please see page 9 and 12 of the 2025 Bunzl Statement for information on the training provided to Shelby Group employees regarding forced labour and child labour.

VIII. Requirement (g) – Assessing effectiveness

Please see pages 8 of the 2025 Bunzl Statement for information on how the Bunzl Group, including Shelby Group, assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

Approval and Attestation of the Shelby Group International 2024 Report

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I, in the capacity of Corporate Secretary, attest that I have reviewed the information contained in the report of the governing body of Shelby Group International. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects, for the purposes of the Act, for the reporting year listed above.

_____

Daniel J. Lett, Corporate Secretary
May 29, 2026
I have the authority to bind the Shelby Group International

EXHIBIT A
2025 BUNZL PLC STATEMENT

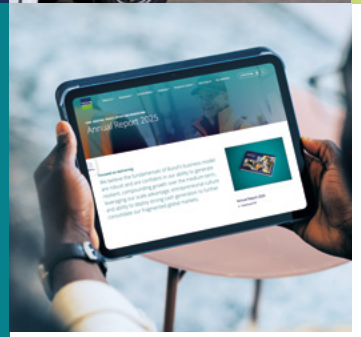
Focused on **fairness**

Bunzl plc
Modern Slavery and Human Trafficking Statement 2025

INSIDE THIS REPORT

Our report and commitment

Modern slavery is a global issue and requires global action. As an international business we are wholly committed to eliminating modern slavery practices and respecting human rights across both our own operations and our supply chain.



We take appropriate action to ensure that all our employees understand our policy of eliminating forced labour, child labour and human trafficking. We expect our suppliers to meet or exceed local legislative requirements and applicable international requirements for workers' welfare and conditions of employment, such as those set by the International Labour Organization ('ILO') and the Ethical Trading Initiative ('ETI').

We aim to ensure that our suppliers apply these standards within their operations and their own supply chains.

This Statement covers the period 1 January – 31 December 2025, was approved by the Board of Bunzl plc on 22 April 2026 and has been signed on its behalf by Frank van Zanten, Chief Executive Officer. This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015. This statement is published on the Bunzl plc website.

Helping you find the information you need from this document, and beyond.

Throughout the statement we will point you to further reading and we have included QR codes to make it easy for you to access online content from our printed report.

For further information on any of our policies, please see below and on our website.

Annual Report 2025
Link to go here

Sustainability Report 2025
Link to go here

Employee Code of Conduct
Bunzl Policy Hub

Supplier Code of Conduct
Bunzl Policy Hub

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03 About us, our operations and our supply chain
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10 Managing our supply chains
13 Progress made

INTRODUCTION FROM OUR CEO

Frank van Zanten, CEO

"We are committed to working to eliminate any occurrence of modern slavery from our operations and our supply chain."

I am pleased to share Bunzl's Modern Slavery Statement for 2025. It sets out the steps that we are taking to ensure, as far as possible, that slavery and human trafficking are not taking place in our supply chain or in any part of our business.

Global supply chains are complex networks that connect people, products and data. We recognise that policy makers and other stakeholders are increasingly calling for greater responsibility and transparency in how companies manage risks within their supply chains and we are proud to have a strong, risk-based approach to responsible sourcing at Bunzl.

With almost 50 million people worldwide estimated to be living in slavery, including nearly 28 million in forced labour situations, human rights violations in manufacturing supply chains pose a significant risk. Addressing these challenges requires robust due diligence and governance systems to identify, mitigate and remediate potential issues .

As a global company operating in over 30 countries, with an extensive international supply chain, our responsibilities extend far beyond our own people, premises and vehicles. We are committed to working to eliminate any occurrence of modern slavery from our operations and our supply chain.

We support this commitment by training our employees and raise awareness of this important issue across our businesses. This ensures that our employees, regardless of their roles, can recognise and understand potential modern slavery issues and take appropriate action.

For more than 15 years we have taken a risk-based approach to auditing in our supply chain, We are proud that our approach is a benchmark for ethical auditing in our sector and it allows us to provide a thorough level of oversight over our supply chain for our customers. In 2025, we continued to expand our audit programme and assessed 1,430 suppliers. We increased the proportion of high-risk spend covered by our assessment and auditing programme to 93%, up from 89% in 2024. This means we have achieved our long-term target to ensure that 90% of our spend on products from all high-risk regions across the world was to be sourced from assessed and compliant suppliers by the end of 2025.

Building on this progress, we will establish a new ethical sourcing target in 2026, designed to further strengthen supply chain transparency, deepen supplier engagement, and drive continuous improvement of labour standards across our global network.

Frank van Zanten
Chief Executive Officer
22 April 2026

ABOUT US, OUR OPERATIONS AND OUR SUPPLY CHAIN

Powering global supply chains for essential goods

Bunzl is a specialist international distribution and services group with operations across the Americas, Europe, Asia Pacific and the UK & Ireland. We support businesses all over the world by sourcing, consolidating and delivering a wide range of non-food products across a variety of market sectors including foodservice, grocery, safety, cleaning & hygiene, retail and healthcare.

Bunzl's global operations connect our distributed, flexible supply chain with customers across a range of sectors. We generally do not manufacture any of the products we supply and the vast majority of the products we distribute are sourced locally by our businesses.

Our procurement experts and category specialists work with both international and local direct suppliers to responsibly source a wide range of products globally. We take a proactive, direct and risk-based approach to ensure that our supply chain partners are complying with the high ethical standards demanded by our policies. We regularly review best practice to ensure that our controls are fit for purpose and this year we have completed a new supply chain risk assessment.

Ensuring our suppliers' adherence to our policies can be a challenging task due to the complexity of our supply chain, which involves numerous Bunzl operating companies and suppliers located at various tiers and levels in diverse locations.

Therefore, we take a risk-based approach to responsible sourcing and focus our sustainability and responsible sourcing efforts where we have most risk and influence; our Tier 1 suppliers.

With over 15,000 direct suppliers, focusing on Tier 1 allows us to make more impactful changes within the immediate reach of our businesses. We have limited influence over Tier 2 and other suppliers further down our supply chains, where non-compliance risks are higher. To mitigate these risks, we collaborate closely with our Tier 1 direct suppliers to monitor and manage compliance at this level. Over time, improving the sustainability-related activities in Tier 1 of our value chain will set a strong foundation and once robust practices are established at this level, we and our supply partners can gradually extend our focus to Tier 2 and beyond.

Our acquisition strategy is a key component of our growth model and we announced 8 new acquisitions during 2025. Our Global Supply Chain Solutions team tracks any additional spend in high-risk sourcing regions and arranges assessments and audits to ensure the products are sourced in line with our policies.

KEY STATISTICS

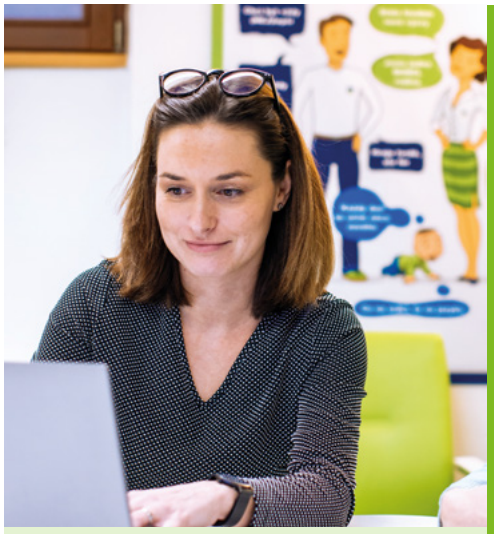
Revenue
£11.8bn

Employing
c.27,000
people

Operating in
33
countries globally

More than
15,000
suppliers globally, covering over 70 countries

c.150
operating companies



Building trust with insight

Many of Bunzl's customers operate in sectors exposed to high levels of public and regulatory scrutiny. There has been a noticeable increase in customer interest in this area.

One of our major mining customers in Australia wanted better visibility of sustainability risks across their supply chain

We supported this process by mapping their supply chain and offered a structured review, covering areas such as our sourcing practices, supplier engagement activity, risk management processes and governance. Similar work was done for a major US retailer's procurement team. We delivered a detailed presentation covering our sourcing standards, audit programme, risk assessment processes and approach to corrective actions.

For both customers, this engagement deepened their confidence in how we manage ethical and supply chain risks.

ABOUT US, OUR OPERATIONS AND OUR SUPPLY CHAIN continued

MAPPING OUR IMPACT – THE MATERIAL ESG THEMES MAPPED TO OUR VALUE CHAIN

Tier 2 suppliers and beyond	Tier 1 suppliers	Our operations and distribution	Customers	End consumers
e.g. raw material producer	e.g. large multinational paper manufacturer	e.g. Bunzl operating company	e.g. large facilities management company	e.g. Individual using washroom facility
LOW INFLUENCE	HIGH INFLUENCE	OPERATIONAL CONTROL		

Our material ESG themes

- RESPONSIBLE SOURCING
- INVESTING IN A DIVERSE WORKFORCE
- PROVIDING TAILORED SOLUTIONS
- TAKING ACTION ON CLIMATE CHANGE
- BUSINESS CONDUCT

BUNZL'S MODERN SLAVERY AND HUMAN RIGHTS RISKS

Risk in focus across Bunzl's global footprint

Direct operations

The majority of our businesses are based in North America, Europe, the UK & Ireland and Australasia and are involved solely in the procurement, consolidation and supply of manufactured goods. In our view, the profile of our operations in terms of locations and roles therefore means that the risks of modern slavery are low. However, because of our global footprint and diversity of sectors, we know that human rights abuses may exist in any market in which we operate. Such issues may involve our own workers as well as agency workers and other types of sub-contracted labour.

All Bunzl companies have developed and implemented policies and procedures in line with the UN Universal Declaration of Human Rights, local legislative requirements and Group HR policies with a view to ensuring that our own people, agency workers and other sub-contracted labour are treated fairly and equally.

In the UK & Ireland our businesses have policies and procedures in place regarding right to work document checks and measures in place for monitoring whether employees have duplicate bank accounts.

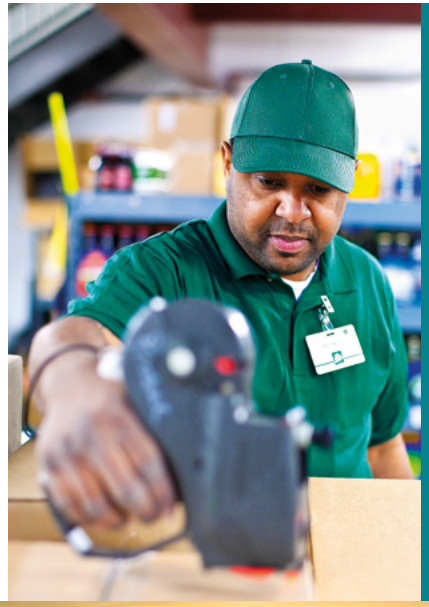
We never levy any charges on any employee in respect of their recruitment costs. The costs associated with the right to remain and work in the UK & Ireland are borne by individuals before they join Bunzl but in the very small number of cases where we sponsor workers, all of the costs associated with the sponsorship are borne by Bunzl.

Supply chain

In every country and sector where we buy goods and services, there are people working to extract and grow raw materials, to manufacture goods and to pack and ship them to our businesses around the world. Any global supply chain carries social risk. The majority of our suppliers are based close to our operating companies. A relatively small proportion of our operating companies are based in countries that have a higher risk of modern slavery issues. We do also import products from other areas, primarily Southeast Asia, where we consider the potential risks of forced or child labour and other modern slavery issues to be higher.

To ensure we take account of the most material issues in our supply chain, we conducted a new comprehensive risk assessment in 2024. In addition to modern slavery risks, our new methodology has assessed a broader range of ESG issues (bribery, environmental, health & safety etc.) to ensure alignment with the latest legislation and public coverage. We partnered with supply chain assurance expert, LRQA, to complete the project and have based our assessment on inherent risk data at country and product level to predict risk likelihood as

Our country ESG risk ratings have assessed high-risk regions using 38 ESG metrics across five areas: labour; health & safety; environment; business ethics; and management systems. Each country receives an overall supply chain risk rating, along with scores for each pillar and its subcategories, reflecting the worst-case scenario without risk mitigation.



All Bunzl companies have developed and implemented policies and procedures in line with the UN Universal Declaration of Human Rights, local legislative requirements and Group HR policies

BUNZL'S MODERN SLAVERY AND HUMAN RIGHTS RISKS continued

Product risk, like country risk, evaluates sectors based on five key pillars: labour practices; health & safety; environmental impact; business ethics; and management systems. It combines country risk with an added focus on the Bureau of International Labor Affairs' ('ILAB') List of Goods Produced by Child Labor or Forced Labor, highlighting products and industries linked to exploitative practices.

Supplier inherent risk assessments are informed by audit data (data from over 20,000 social and environmental assessments), public domain data (complementing audit data particularly in areas where audits might not fully capture specific violations or in regions with limited audit samples) and EiQ sentinel data (web-based data points, including news reports, public records and sanction lists).

Despite expanding the scope of our assessment to consider a wider range of ESG topics, the key risks associated with our supply chain all relate to modern slavery, with forced labour, child labour, hours of work and occupational safety amongst the most pertinent issues. Looking at these risks in isolation, our total number of high-risk suppliers will remain largely unchanged from our previous assessments.

This work and its results reinforce the importance of our ethical auditing programme led by our Global Supply Chain Solutions team based in Shanghai.

We are pleased that we have achieved the responsible sourcing target we set in 2021. This milestone reflects our commitment to ethical practices, strengthens stakeholder trust, and enhances the resilience and transparency of our supply chain.

We have used the results of our updated risk assessment to review and, where necessary, update our responsible sourcing programme from 2026 onwards. This ensures a more proactive approach to identifying and mitigating risks, improving supplier performance, and aligning with evolving regulatory and sustainability expectations. We have developed a set of guidelines that detail the country and supplier risk classification methodology, the processes and frequency for communicating, conducting, and managing Supplier Assessments, and the requirements relating to the Supplier Code of Conduct, enabling greater consistency, accountability, and efficiency across our sourcing activities.

With more individuals migrating now than at any point in the last 50 years due to conflict, natural disasters or simply to seek employment, the risk of exploitation is increasing and the most vulnerable (women, children and migrants) will be disproportionately affected. In recognition of this situation, we will continue to work with an expert, independent body to reassess our supply chain risks on a regular basis.

More details around our risk mitigation strategy can be found in the Managing our supply chains section of this Statement.

Read more on page 10

Centralised supplier data for risk mitigation

To strengthen our approach to identifying and mitigating modern slavery risks, we developed a centralized database designed to consolidate and analyse all supplier-related compliance data in one system.

The system serves as a single repository for all supplier audit information, including audit findings, risk ratings, remediation progress, and supporting documentation and improves visibility across our supply chain, enabling more proactive risk management.

A core feature of the database is its ability to automate key processes. The system generates reminders for upcoming audits, overdue corrective actions, and expiring documentation, such as signed Supplier Codes of Conduct. Automated notifications support timely follow-up, reducing the risk of prolonged exposure to unresolved labour issues.

In addition to improving data management, the platform enhances our analytical capabilities. By aggregating data across regions, sectors, and suppliers, we can identify patterns and trends related to social risks, such as recurring non-compliances in working hours, recruitment practices, or worker representation. These insights inform targeted interventions, including focused training, deeper due diligence, or increased audit frequency for higher-risk suppliers.

Overall, the development of this centralized database represents a significant step forward in our efforts to prevent and address modern slavery risks. By combining robust data management with automation and analytics, we are better equipped to identify issues early, prioritise action, and drive sustainable improvements across our supply chain.

BUNZL'S MODERN SLAVERY AND HUMAN RIGHTS RISKS continued

The key risk areas and how they are covered by our audits:

RISK AREA						
Child labour and young workers	**Forced labour and disciplinary practices**	**Migrant workers (including domestic)**	**Freedom of Association**	**Wages and working hours**	**Fire safety**	**Safety and environment**
AUDIT REVIEW POINTS						
• Checking completeness of employee rosters and registration of young workers. • Reviewing policies and observed practices against child labour and on young workers, including a review of young workers' work requirements.	• Reviewing policies and observed practices against forced labour, physical punishment, discrimination, harassment & abuse. • Ensuring no payments are made to the supplier or a recruitment agency. • Ensuring there is no non-voluntary overtime work, • ID card or passport confiscation or any physical containment of workers.	• Reviewing recruitment practices, employment and living conditions. • Ensuring ID cards, passports or legal certificates to work are not confiscated.	• Checking the right of employees to join or form trade unions and to bargain collectively. • Checking for an established method for independent and free association and bargaining, when right to freedom of association and collective bargaining is restricted under law.	• Checking for timely payment of normal and overtime wages and meeting minimum wage standards, with no illegal or unreasonable wage deductions. • Ensuring sufficient rest hours and days and that daily and monthly overtime is controlled within legal requirements.	• Reviewing the adequacy, availability and maintenance of fire extinguishers, fire alarm, emergency lights, emergency exits, training and evacuation plans in workers' language. • Ensuring the dormitory is located in a building separated from the workshops and warehouses.	• Checking machine guarding, warning labels and procedures to operate equipment. • Ensuring there is sufficient protection from exposure to hazardous materials and personal protective equipment is provided.
Example countries with increased risks						
India, Malaysia, Thailand, Taiwan, China, Pakistan, Vietnam						
Example products with increased risks						
Wearing apparel, janitorial equipment, personal safety and protection equipment, paper and packaging materials						

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Bunzl embeds human rights standards across all corporate responsibility policies

Bunzl adheres to a comprehensive suite of corporate responsibility ('CR') policies and standards.

Those policies and standards reflect the UN Universal Declaration of Human Rights and require compliance with internationally recognised requirements for workers' welfare and conditions of employment as defined by the ILO or the ETI which specifically prohibit forced labour, e.g. slavery and human trafficking, unfair wages and working hours, discrimination and denying freedom of association. The key CR policies are summarised below. The policies are reviewed by the Board at least every three years (more often if new legislation, requirements or guidance emerges) to ensure that they remain appropriate.

Our policies

The **Bunzl Code of Conduct** defines the principles and standards that we expect our employees to understand and adhere to. It is never acceptable for our employees to deviate from the Code to achieve a business objective. The Code is communicated in local language to our employees worldwide and forms part of the onboarding process for new employees.

Our **Ethical Sourcing Policy** ensures that Bunzl sources products in an ethical and consistent manner. The policy sets out the principles of

our supplier evaluation and auditing programme, including the Supplier Code of Conduct. More information is provided in the Managing our supply chains section of this statement.

Our **Speak Up Policy** sets out our internal grievance reporting procedures. We expect our employees to make management aware of all non-compliances to our Code of Conduct, any applicable law and/or company policies. The Speak Up posters are displayed on notice boards in each facility, including information on how to report matters confidentially and anonymously. None of the 157 whistleblowing reports we received through the Speak Up line in 2025 related to modern slavery or any other issues of material concern.

Our **Inclusion and Belonging Policy** sets out the principles of our employment procedures and practices, which are based on a principle to treat people fairly and equally and opposing all forms of discrimination. All businesses develop and implement local HR policies and procedures that support and demonstrate the principles of the global policy.

Our policies can be found in the Policies Hub section of the Bunzl plc website

Monitoring our policies

Implementation of our policies within our operations is monitored by a team of human resources professionals and is reviewed by our internal auditors who periodically visit Bunzl locations and audit the operations to ensure that they meet the relevant standards. In addition to this, every business is required to complete an annual self-assessment. The self-assessment is a key element of monitoring the implementation and effectiveness of our modern slavery policies, with key areas of scrutiny being employee training, communicating the Employee Code Conduct to employees, the communication of the Supplier Code of Conduct to suppliers and the auditing process.

Supply chain monitoring, such as the execution and follow-up to social risk audits, is undertaken by our local procurement professionals and our Global Supply Chain Solutions team based in Shanghai. Nisbets also has global sourcing offices based in Shenzhen and Delhi, which allow for greater collaboration and monitoring of its supply chain due to the proximity to the factories supplying goods.

The effectiveness of our audit programme and ethical sourcing policies are monitored by our Supply Chain Committee (see 'Governance' section), with regular reports to the Group Sustainability Committee. Regular reports are submitted to, and reviewed by, the Bunzl plc Board of directors summarising the audits that have been carried out, the material issues that have been identified from such audits and the follow-up actions taken to address such issues.

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING continued

Governance

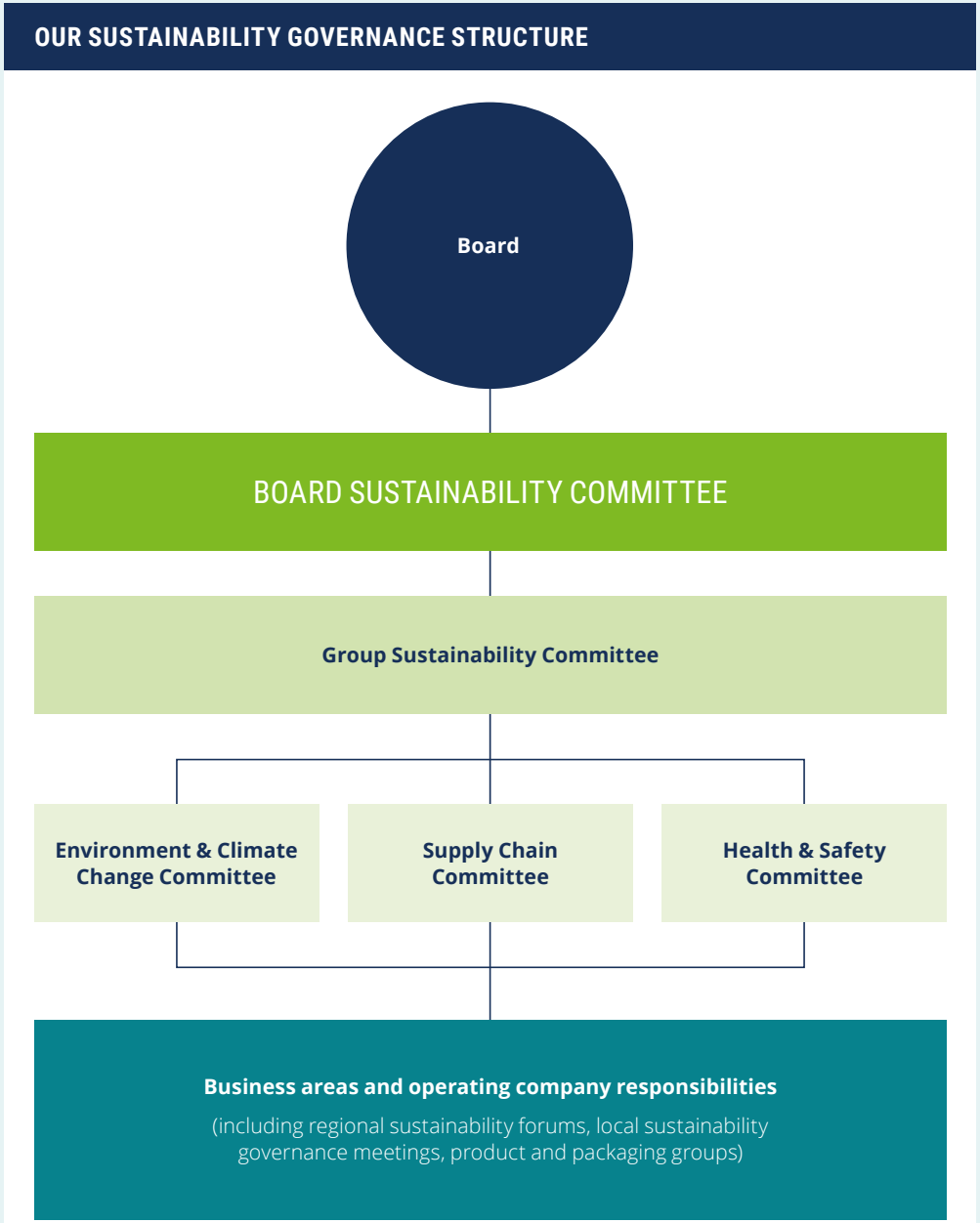
Although we are a decentralised Group which gives management autonomy to take decisions relating to our operations locally, we have a clear governance framework that allows the Board and the Executive Committee to lead the Company in the right direction. Our Chief Executive Officer and members of the Executive Committee have overarching accountability for the standards in our operations and supply chain and are responsible to the plc Board. The Audit Committee (a sub-committee of the Board) also plays a role in ensuring that an adequate risk management framework is in place. Day-to-day management of the business, including procurement, is devolved to the regional managing directors in each of our operational geographies.

Through our governance meetings we ensure that we adequately and proactively address the key sustainability and CR trends facing our business. The Board Sustainability Committee provides an oversight function to the Group Sustainability Committee and comprises all of the independent non-executive directors and the Chairman of the Board, who also chairs the committee.

Our Group Sustainability Committee, chaired by the Chief Executive Officer, sets and oversees implementation of all policies and programmes in the whole value chain, including those for social risk matters related to our operations and our supply chain.

The Group Sustainability Committee is supported by our Supply Chain Committee, comprising our Head of Corporate Responsibility, Group Head of Sustainability, Director of Global Sourcing and the procurement leads from all business areas. The Supply Chain Committee is responsible for developing processes and procedures to assess opportunities and mitigate risks within our global supply chains, ensuring regulatory compliance as a minimum. The Committee focuses on providing transparency on social risks in our global supply chain and coordinating and overseeing actions to mitigate those risks

OUR SUSTAINABILITY GOVERNANCE STRUCTURE



Employee training

One of our focus areas continues to be on training our people and raising awareness of modern slavery. All of our senior employees, including managers, procurement and sales executives, are required to complete the CR e-learning modules on modern slavery risks. The training helps our employees to understand and recognise social risk issues that might occur in our supply chain and informs them of the appropriate actions that should be taken if such issues materialise. All businesses are required to ensure that new and existing employees view the training materials applicable to their role, including the modern slavery risk module.

The following training modules are mandatory:

- Code of Conduct.
- Customers and suppliers.
- Speak up.
- Combatting Modern Slavery.

The Combatting Modern Slavery training helps employees to be aware of and recognise modern slavery issues and explains Bunzl's risk assessment and mitigation programmes.

It also provides information on what to do if an employee suspects that modern slavery is, or may be, taking place.

In addition to the e-learning modules, we have developed social risk training materials aimed at further increasing our businesses' awareness of the risks of modern slavery and our programmes to mitigate these risks. Our Global Supply Chain Solutions team consists of professional auditors who are trained in identifying and reporting social risks.

MANAGING OUR SUPPLY CHAINS

Our Global Supply Chain Solutions team in Shanghai is uniquely positioned to give us a thorough level of oversight of our high risk regions in our supply chain.

This team ensures that our suppliers from Asia, the Group's most material high-risk sourcing region, as well as suppliers from other high risk regions are subject to frequent and stringent social risk assessments and audits.

We use the results of our supply chain risk assessment (referred to in the 'Bunzl's modern slavery and human trafficking risks' section of this Statement) to continuously enhance the mitigation of social risks in our supply chain. We rank our sourcing countries by risk level and ensure that effective mitigation of slavery and human trafficking risks is in place, appropriate to the risk level.

OUR DUE DILIGENCE PROCESSES IN RELATION TO THESE RISKS IN OUR SUPPLY CHAIN ARE CENTRED AROUND FOUR ELEMENTS:

RESPONSIBLE SOURCING STATISTICS

93%
spend in high-risk regions that is with assessed and compliant suppliers

c.97%
total spend today is either in low-risk regions or with assessed and compliant suppliers in high-risk regions

98%
of our spend in Asia is with suppliers who are audited at least every two years

OUR PROGRAMME

Externally accredited
as equivalent to global best practice standards

Global Supply Chain Solutions
team in Shanghai with specialist internal auditors

1,430
suppliers assessed in 2025

MANAGING OUR SUPPLY CHAINS continued

1. Standards and governance – our Supplier Code of Conduct

Our requirements relating to modern slavery risks are communicated in our Supplier Code of Conduct. We expect all suppliers to adhere to our Supplier Code of Conduct as a condition of doing business with us. The supplier code is available in more than 15 languages and is actively communicated by our businesses to our suppliers, particularly in those countries with an increased risk of modern slavery and other social risks. We send the Supplier Code of Conduct to all of our suppliers. By trading with Bunzl, we expect suppliers to accept and apply our standards and also to procure compliance by their suppliers and sub-contractors. Suppliers in high-risk countries receive the Code every year and we require confirmation of acknowledgement and adherence.

The key elements of the Supplier Code of Conduct are:

- We require compliance with internationally recognised minimum requirements for workers' welfare and conditions of employment as defined by the ILO and the ETI, which specifically prohibit child labour, forced labour (including slavery and human trafficking), unfair wages and working hours, discrimination and denying freedom of association.
- We expect our suppliers to be honest in their dealings with others, obeying all applicable laws and corresponding regulations governing fraud and anti-bribery and corruption.

Suppliers can report to our Company any actual or suspected violation of the Code or breach of any applicable law that involves or impacts our Company. This also includes actual or suspected misconduct of employees of Bunzl. Reports can be made to the local subsidiary of our Company with which the supplier has a business relationship. If for any reason this would not be feasible, suppliers may confidentially report to our head office by email at TellBunzl@bunzl.com.

2. Assessment – supplier assessments and audits

We have an Assurance and Quality Control team based in Shanghai which performs regular audits of our direct suppliers in Asia to ensure that they meet our standards in relation to human rights and conditions of work. The audits cover various aspects including child, forced or bonded labour, disciplinary practices, management of homeworkers and foreign migrant workers, freedom of association, wages, working hours and health & safety.

Our standard audits are conducted over one day (usually with one auditor, but occasionally two if the supplier is over a given size) and enhanced audits take place over two working days. The type of audit (standard or enhanced) is determined by a review of factors such as spend and number of employees at the supplier's location.

We continually update our audit guidelines to ensure they are consistent with external best practice and cover all the relevant risks. Our standards have been reviewed by an independent external consultant (LRQA). LRQA has confirmed that the Bunzl Auditing Checklist has the same content and is equivalent to the SMETA Checklist, one of the leading external auditing standards available.

The table below provides an overview of how we use our risk assessment to categorise suppliers and the mitigation we then apply.

In 2025, we assessed 1,430 suppliers (2024: 1,175) and 1,332 of these had no critical issues. If our assessments identify any zero tolerance issues (for example, wage violations or instances of forced labour), we work to resolve these quickly through in-depth engagement with the supplier. If resolution is not possible within a reasonable time frame (usually six months), we terminate the relationship. In 2025 we terminated contracts with four suppliers who failed to address various issues or make enough progress.

1 Policy review
Review of key policies and procedures such as the Anti Bribery & Corruption document and Supplier Code of Conduct.

2 Factory tour
Site to identify potential points to be covered further in interviews and document checks.

3 Employee interviews
Interview with employees, selected at random, about their freedom of movement, salary, days and hours worked, etc.

4 Document review
Review of documents related to employees' working hours, salaries paid, etc.

Description	Countries and product sectors	Risk mitigation
Suppliers operating in (very) high-risk countries regardless of product risk sector. Our responsible sourcing target to 2025 covers this category.	Most Asian countries. Key countries outside of Asia are Brazil, Turkey and Mexico.	Standard or enhanced Bunzl audit and assessment process. Type of audit (standard or enhanced) to be determined by product risk sector and other leverage factors such as spend and number of employees at supplier location. These suppliers are also provided with Bunzl's Supplier Code of Conduct.
Suppliers operating in lower-risk countries.	In various countries such as USA, UK, France and the Netherlands.	These suppliers are provided with Bunzl's Supplier Code of Conduct. In addition to the audits conducted by our team in Asia, our local operating companies carry out audits of suppliers in the regions in which they operate, based on local risk assessments.

MANAGING OUR SUPPLY CHAINS continued

3. Corrective action – findings and remediation

Our Global Supply Chain Solutions team in Shanghai, senior management and procurement professionals in our operating companies work closely with suppliers to achieve acceptable standards in all areas of our audit, and where breaches are identified, appropriate action is taken to address them. Suppliers who are unable to meet all the requirements after an initial assessment are given the opportunity to comply fully within a period of time which is deemed appropriate for the circumstances.

We show zero tolerance for unacceptable practices at any site used for producing or sourcing Bunzl products. Such unacceptable practices include use of child, forced or bonded labour, illegal discrimination, wages not meeting local minimum requirements, not providing adequate days of rest and any other breach of local or applicable international requirements for workers' welfare and conditions of employment. Relationships with suppliers that fail to make improvements in those areas will be terminated.

Remediating issues in our supply chain

A Vietnamese supplier working with an operating company in the Netherlands failed an audit in 2025 for not paying the minimum wage to newly hired employees. Due to a misunderstanding of local labour law, the supplier had incorrectly included a legal responsibility allowance within the basic salary calculation. Our auditor provided patient training to the supplier's HR Head, who secured senior management approval to restructure the basic salary. The supplier submitted rectification evidence, which was approved. The issue is now resolved, ensuring improved outcomes for workers and ongoing business for the manufacturer.

In 2025, 98 suppliers underwent remediation efforts to correct identified unacceptable non-conformities. Four suppliers did not make sufficient progress to address the concerns and we have subsequently ceased our relationship with them.

Bunzl is a member of the Responsible Labor Initiative ('RLI'). Established in 2017, the RLI is a multi-industry, multi-stakeholder initiative that focuses on ethical recruitment and employment practices. Based on leading Responsible Business Alliance standards and programmes, RLI members, suppliers, recruitment partners and stakeholders use their collective influence and application of due diligence to drive the transformation of recruitment markets and reduce the risk of forced labour in global supply chains.

We always show a willingness to work with suppliers to address areas of improvement as it is crucial to support the individuals affected. We use our leverage as a large international company to drive change and remediate forced labour and other unethical practices in our supply chain.

As a last resort, it may be necessary to exit the relationship and seek alternative sources of supply.

4. Continuous improvement – working with our suppliers

We work with our suppliers to help them prevent social risk issues arising in the first place, as well as addressing them if they are found through our audit programme. We believe that building relationships and trust with suppliers is critical when it comes to preventing and identifying incidences of modern slavery. We regularly organise supplier conferences, predominantly in Southeast Asia, to detail our zero tolerance issues, showcase examples of good practice and build awareness of other social compliance subjects.

These events usually take one or two days and consist of lectures and various interactive workshops during which best practices and challenges are discussed in an open and informal dialogue. In addition to collective training events, we also engage with suppliers directly. Direct supplier training has proven to be a very effective way to help suppliers make very quick progress, with the added benefit of creating a strong relationship with them.

Two supplier training events were organised in 2025; one in Vietnam and our first online training in China. A total of 90 suppliers attended these meetings covering a diverse range of product groups. The training helped these suppliers (a mixture of existing, new and potential vendors) to understand Bunzl's requirements in both social accountability and quality management. Various workshops were held to increase awareness of these topics and help suppliers identify solutions and best practices to mitigate the risks.

PROGRESS MADE

PROGRESS IN 2025

Our progress in 2025 is summarised below. Further details can be found in the respective sections in this statement

Code of Conduct:
We have continued to ensure that the Group Code of Conduct is communicated to our employees and that the associated learning modules are completed by all employees.

Grievance process:
None of the calls received through our Speak Up or Tell Bunzl lines related to modern slavery.

Audits and corrective action:
During 2025, our team in Asia assessed 1,430 suppliers (2024: 1,175) and 1,332 had no critical issues. We have worked with 98 suppliers on remediation efforts to bring them up to the required standard.

Zero Tolerance:
In 2025, we terminated relationships with four suppliers who failed to address various issues or did not make enough progress.

Progress towards targets:
In 2025, 93% of our spend on products from high-risk regions was sourced from assessed and compliant suppliers. We have achieved the target we set in 2021.

Review and update of our responsible sourcing programme:
We have reviewed and updated our responsible sourcing programme. This ensures an even more proactive approach to identifying and mitigating risks, improving supplier performance, and aligning with evolving regulatory and sustainability expectations.

Supplier training:
We held two supplier training events in 2025.

LOOKING AHEAD

We remain fully committed to improving our programmes to eliminate modern slavery from our operations and supply chain. Our main objectives for 2026 are the following:

Further increase our supplier engagement process to maintain and exceed our KPI of 90% of our spend on products from all high-risk regions to be sourced from assessed and compliant suppliers.

Launch the next phase of our responsible sourcing programme, applying the updated standards, policies, processes, and remediation measures recommended by our recent supply chain risk assessment. This includes updated processes and frequency for communicating, conducting, and managing Supplier Assessments, and the requirements relating to the Supplier Code of Conduct.

Continue to take a proactive, risk-based approach to responsible sourcing, identifying common issues in our supply chain and working closely with suppliers to reduce the future incidences of these issues.

Continue to expand capacity building and training of our suppliers in high-risk regions by organising supplier conferences. So far, we have organised one engagement event in Thailand in 2026.

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