



BMT Supplier Code of Conduct

March 2026 v2.0

Foreword

At BMT we take pride in solving complex challenges for our customers, creating value for them and the wider world in which we operate.

Our suppliers are vital partners in achieving this.

This supplier code of conduct sets out a clear framework to help us define clear standards for our supply chain, enabling us to deliver for our customers in line with our values and also to help safeguard our suppliers.

It is founded on the principles of sustainability and our ethos as a business. It will help ensure we can uphold the highest levels of integrity and ethical standards in every place we operate, whilst driving social, economic and environmental improvements in our extended supply chain.

All BMT suppliers must adhere to the standards set out in this Code of Conduct. In doing so we can work together to drive the change we wish to see across industry sectors.



Sarah Kenny
CEO



Introduction

Our corporate values and behaviours adhere to the highest ethical standards by managing operations responsibly and conducting projects in an ethical way.

These principles cascade down to our suppliers who play a critical role in accomplishing our vision.

Amongst our values we recognise that the success of our business and the impact on our environment are not independent of one another as we strive to meet the highest standards of integrity and sustainability in our business activities.

Supplier's commitment

The supplier agrees that:

- They will adhere to this Supplier Code of Conduct ("Code"), which sets out the standards for doing business with BMT.
- They will comply with all applicable laws and regulations within the jurisdictions they operate and if there is a conflict between any applicable laws or regulations, the agreement between the parties, and this Code, the Supplier will meet the most stringent standard.
- They have appropriate systems in place to ensure continuous compliance and to demonstrate such compliance.
- They will be aware of and seek to deliver continuous improvement in line with the UN Global Compact Ten Principles.
- They will provide full and timely cooperation with reasonable requests for information, to determine compliance with this Code.

Applicability and expectations

This Code applies to all transactions, between BMT and a supplier.

The Term "BMT" refers to BMT Group Limited, and any applicable BMT subsidiary that may engage with the Supplier. The term 'Supplier' means a company, partnership or individual that provides goods or services to BMT (including any sub-suppliers and/or sub-contractors of the Supplier).

The term "Worker" means any individual whom the Supplier employs, hires or engages, or otherwise uses to conduct its business. The term "Representative" means the Supplier's suppliers, vendors, agents, and subcontractors who form part of BMT's supply chain.

We acknowledge that ethical business practices and compliance with laws are essential, and we expect our suppliers and partners to act similarly. This Code is not a comprehensive, full, or complete

explanation of all the policies, laws, and regulations that may apply to our suppliers.

Our suppliers also understand and acknowledge that they are solely responsible for ensuring that all their directors, agents, officers, employees, subcontractors, etc. fully comply with the provisions stated in this Code and accept responsibility for their compliance with the terms stated herein.

We expect our suppliers to communicate the principles of this Code down the supply chain, to supplier subcontractors and other representatives who are also involved in supplying products and services to BMT. BMT has the right to modify this Code from time to time on giving the **Supplier** at least 3 days' notice in writing, which includes email.

Marketplace

Compliance - Zero tolerance of illegal activity

Our Code of Conduct is central to our requirement to have a responsible business environment and provides a zero tolerance approach to any form of illegal activity.

This specifically includes any form of activity linked to Bribery, Fraud, Money Laundering, Tax Evasion or any other form of criminality, as defined by any relevant national or international regulation.

At BMT, we require that our employees, contractors and Board members strictly comply with legislative requirements. We want to work with suppliers that share our commitment to safety, ethics and compliance and therefore expect and encourage all of our suppliers and their employees to act in a way that is consistent with our own approach to any forms of illegality, through the adoption of their own similar Code and through having management systems in place to support compliance with all of the above applicable laws and regulations.

We welcome the opportunity to work with suppliers in a compliant environment but reserve the right to take appropriate measures where our contractual obligations and expectations in this area are not met.



Conflicts of interest

Our Suppliers must not collaborate with BMT employees in a way that prevents an employee acting in the best interests of BMT. It is the duty of our suppliers to disclose any potential conflicts of interest in a fully transparent manner to all affected parties, this includes personal interests or those of close relatives, friends or associates.

Fair competition

BMT's suppliers must comply with competition and anti-trust laws (including but not limited to the Competition Act 1998), which safeguards fair and transparent markets amongst competitors. Any violation of these laws - such as bid rigging, price fixing, market sharing, etc.- could involve serious consequences and penalties for all parties involved.

Workforce

Human rights and labour

BMT acknowledges its duty to safeguard the human rights of all individuals involved in its operations. As such, the Supplier will comply with all internationally recognised human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work from time to time in force in any part of its supply chain.

Wages and remuneration

The Supplier must compensate all workers with wages, including overtime premiums, and benefits that (at a minimum) meet the higher of:

- the minimum wage and benefits established by applicable law
- collective agreements
- industry standards
- an amount sufficient to cover basic living requirements

Employee practices

Our Suppliers shall promote an open dialogue, where employee's rights are respected, and mechanisms for raising concerns are in place so that legal and ethical issues and concerns can be raised by employees without the risk of being penalised.

Harassment

BMT does not tolerate any form of harassment in the workplace, including sexual harassment. The Supplier must take appropriate measures to prevent harassment, including sexual harassment, occurring in the workplace including as part of the service provided to BMT, and provide evidence of any such measures to BMT on request.

Safe working environment

The Supplier must provide a safe, healthy, and sanitary working environment, comply with health and safety laws, and operate in an environmentally responsible manner. They should understand the risks of their activities, apply good HSE management systems, and take necessary precautions to protect the environment and their employees from workplace injuries and hazards

Inclusion & diversity

BMT believes in a proactive and strategic approach to Diversity & Inclusivity. We expect our suppliers to share the same commitment to maintaining an exceptional working environment that is culturally diverse and free from all forms of discrimination and harassment. Our suppliers must comply with all applicable civil rights, human rights and employment laws.



Our approach

Environmental responsibility

BMT is committed to protecting the environment and addressing global challenges alongside our customers. We have set ambitious goals, including achieving Net Zero emissions by 2035 across our full value chain.

Our 1.5°C science-based targets have been verified by the Science Based Targets initiative (SBTi), and we recognise that our suppliers play a critical role in achieving these commitments. Our supply chain currently accounts for 47% of our emissions, so collaboration is essential.

Suppliers shall ensure that:

- Its operations comply with all applicable environmental laws, including laws and international treaties relating to (but not limited to) climate change, waste disposal, emissions, discharges and hazardous and toxic material handling
- The goods it manufactures (including the inputs and components that it incorporates into its goods) comply with all environmental laws and treaties
- It will only use packaging materials that comply with all applicable environmental laws and treaties.

We value transparency and partnership to drive progress together.

As such, the Supplier shall:

- Collaborate openly and constructively with BMT to identify, develop, and implement emissions reduction opportunities relevant to the goods or services provided.
- On request, provide greenhouse gas emissions data in line with recognised standards (e.g. GHG Protocol), including activity-based or spend-based data where product or service-level data is not yet available.

The Supplier will have in place a suitable environmental management system for managing its environmental risks.

As a minimum, the system should include and address the following:

- An assessment of the environmental impact of all historical, current and likely future operations
- Steps to continuously improve environmental performance, reduce pollution, emissions and waste
- Measures to reduce the use of all raw materials, energy and supplies; and
- Raising awareness and training employees in environmental matters.



Data protection, information security and our assets

Cyber security

At BMT we take information and Cyber Security seriously.

We ensure that all personally identifiable, classified, and sensitive information is appropriately managed and stored with appropriate level of protection, including access management and data retention, in compliance with applicable data protection and privacy laws in the countries where we operate, as well as recognised international standards such as ISO/IEC 27001.

Our suppliers must ensure that they have the appropriate cyber security arrangements in place in accordance with the type of information they are handling and must meet the latest legal and/or contractual requirements applicable to the data held.

Such information and data must be kept confidential and protected from any unauthorised access, destruction, use, modification, and disclosure, through appropriate organisational and technical controls at all times and not be used for any purposes other than the business purpose for which it was provided or made available.



Wherever suppliers are aware of a security and/or data privacy incident that affects or has the potential to affect BMT or its customers or their customers, they must inform BMT immediately.

Data protection, information security and our assets *continued*

Artificial Intelligence (AI)

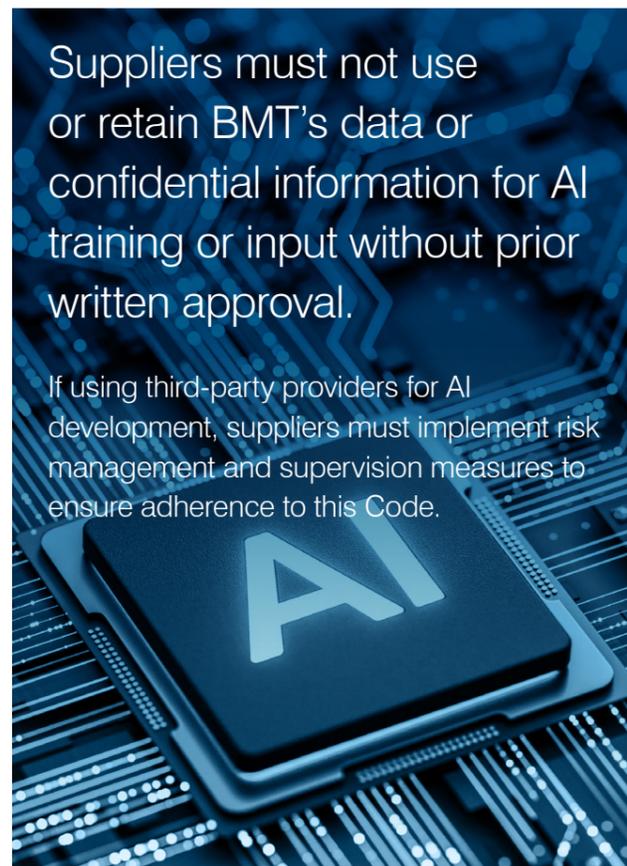
We acknowledge the opportunities and risks associated with AI, including privacy, security, inclusiveness, accountability, transparency, fairness, reliability, and safety.

Suppliers must inform us if they propose to use AI systems to provide goods or services to BMT. This applies to direct provision of goods/services, not internal management.

Suppliers must adhere to responsible and ethical practices when designing, implementing, monitoring, training, testing, deploying, or using AI systems, including compliance with laws, regulations, industry standards, and codes of practice.

Suppliers shall:

- Ensure AI systems are robust, secure, and safe throughout their lifecycle.
- Respect human rights and values, including fairness, equality, diversity, privacy, and data protection, avoiding discrimination and bias.
- Be transparent about AI usage.
- Ensure explainability, auditability, and traceability of AI systems and their outputs.
- Establish governance, risk management, policies, and procedures for responsible AI use.
- Ensure decisions or outcomes from AI systems are contestable.



Intellectual Property

Our Suppliers understand the measures for managing BMT's intellectual property and related rights in their operations and take all necessary steps to safeguard these intellectual property rights and relevant third party rights.

Suppliers must seek authorisations before using BMT's name, trademarks, logos, images, designs and other proprietary information in both internal and external media and publications.



Global trade compliance

Conflict minerals

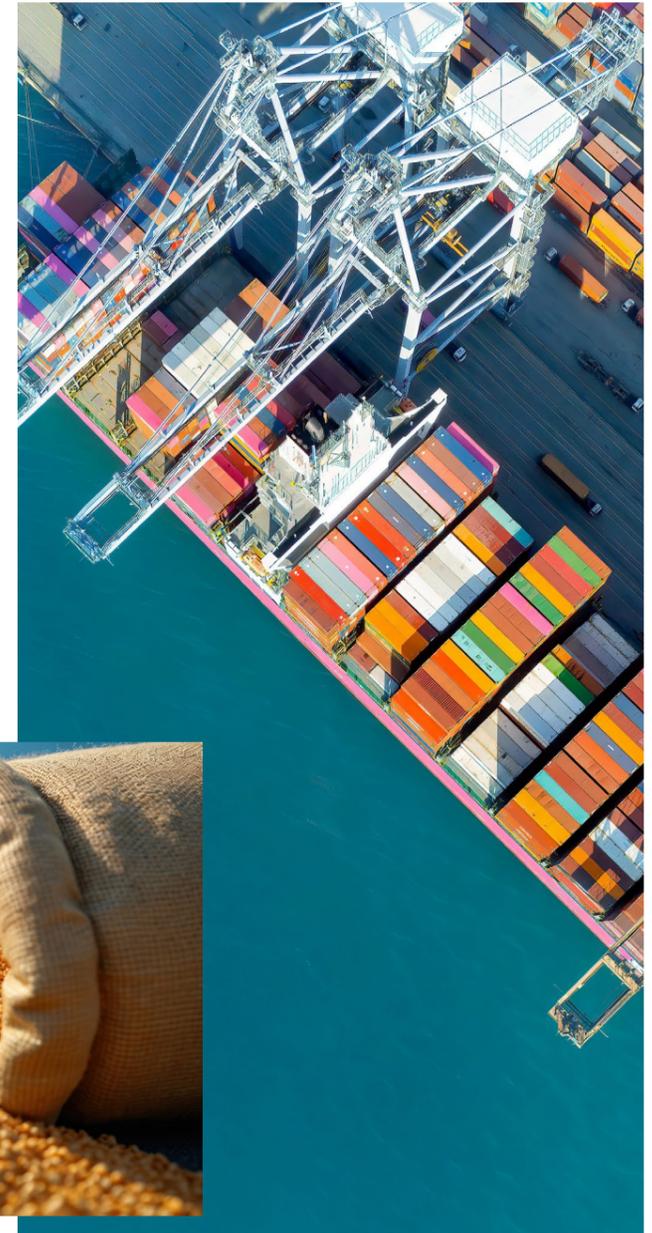
All suppliers must comply with laws and regulations regarding conflict minerals. Suppliers also have a responsibility to ensure conflict minerals maintained in products they manufacture do not directly or indirectly support armed groups that are perpetrators of serious human rights abuses.

Counterfeit product(s)

Our suppliers must take necessary precautions appropriate to their products to avoid the inclusion of counterfeit parts and materials into deliverable products.

Import / export

It is the duty of our suppliers to comply with import and export control laws and regulations, provide an accurate record of information and obtain export licenses and/or consents where applicable.



Reporting issues

We encourage our suppliers to contact their local BMT representatives if they have any questions or concerns.

Alternatively, suppliers may report concerns via **BMT's Raising Concerns confidential line.**





**BMT is a leading design, engineering,
science and management consultancy
with a reputation for engineering
excellence.**

We are driven by a belief that things can always be better, safer, faster and more efficient. BMT is an independent organisation held in trust for its employees.



BMT Group Ltd registered in the United Kingdom

Registered no. 1887373

Registered office Level 5, Zig Zag Building, 70 Victoria Street, London SW1E 6SQ

www.bmt.org

