

## SUPPLIER CODE OF CONDUCT

### A. The way we work with Suppliers

Our Suppliers are valued business partners and we believe, by working together, we can raise standards, drive sustainable practices and create shared value.

### B. Commitment to integrity

Our actions must always be lawful. Having integrity goes further. It means our actions; behaviors and how we do business must be responsible, honest, sincere and trustworthy. We are committed to upholding our contractual obligations with Suppliers and to treat them fairly.

Suppliers should expect clear and constructive engagement from BMJ and to be treated in a professional and inclusive manner, with dignity and respect, in accordance with the BMJ Business Conduct.

### C. Supporting suppliers

We recognize the different circumstances of our Suppliers worldwide, and that some will face legitimate challenges in immediately meeting every facet of this Code.

As our ultimate goal is to drive the continuous improvement of standards within our supply chain, we are committed to working with such Suppliers over time to help them achieve adherence with the requirements of this Code.

By working together, allowing Suppliers to benefit from our resources and experience, we aim to increase awareness and capacity, and help our Suppliers improve and achieve best practice standards.

### D. Compliance

We are committed to monitoring compliance to the requirements of this Code, and ensuring any issues identified are investigated and remediated.

#### 1. Legal compliance

We expect our Suppliers to comply with all relevant laws, codes and regulations, and to act in an ethical manner.

As such, Suppliers must:

- a. Comply with all applicable laws, codes and regulations wherever they operate and however they may apply to them;
- b. Promptly notify the BMJ of any significant criminal or civil legal actions brought against them; and
- c. Promptly notify the BMJ of any fines or administrative sanctions brought against them which relate in any way to the requirements set out in this Code.

## **2. Compliance monitoring**

We reserve the right to verify new and existing Suppliers' compliance with the requirements of this Code through internal and/or external assessment and audit mechanisms.

Suppliers must provide all reasonable cooperation with any verification activity linked to this Code (whether carried out by the BMJ or by third parties engaged by the BMJ), including ensuring relevant documentation and data is held for as long as required by the BMJ and/or relevant laws, and the granting of independent access to relevant personnel, sites, documentation and data.

Such cooperation shall be discussed and agreed to by the BMJ and the Supplier, to ensure it is performed within working hours and that reasonable notice is given in advance.

This is notwithstanding legitimate restrictions applicable to commercially sensitive and/or confidential information – in such cases (and where such information is believed to be of material relevance to verification activity), Suppliers should work with the BMJ to try to identify mutually acceptable mechanisms for its safe and legitimate disclosure.

## **3. Reporting concerns**

Suppliers are expected to support the identification, investigation, addressing and reporting of suspected or actual breaches of the requirements of this Code.

As such, Suppliers must:

- a. Have effective grievance or equivalent procedures in place to enable their Workers, in confidence and without fear of reprisal, to ask questions, raise concerns and/or report suspected or actual breaches either to the Supplier itself or directly to the BMJ;
- b. Promptly investigate any credible concerns about suspected or actual breaches of the requirements of this Code, and take appropriate action to avoid any potential breaches taking place, and/or minimize the impact of, and stop, any actual breaches; and
- c. Report any suspected or actual breaches of the requirements of this Code to the BMJ as soon as they become aware of them, as explained under Speaking Up.

## **4. Speaking Up**

Any actual or suspected breaches of this Code can be raised with the Supplier's usual BMJ contact, or through Internal Control team.

They can be used in confidence (and anonymously, if you prefer to do so), without fear of reprisal. You will not suffer any form of reprisal (whether directly or indirectly) for raising concerns about actual or suspected wrongdoing, even if you are mistaken. We do not tolerate the harassment or victimization of anyone raising concerns or anyone who assists them.

#### **E. Investigations**

We take any concerns, allegations or reports of suspected or actual breaches of this Code seriously. Where appropriate, we will investigate such matters fairly and objectively in accordance with our internal policies and procedures.

In other cases, we may ask a Supplier to lead an investigation of the matter in accordance with its own procedures.

Where required by BMJ, the Supplier is expected to liaise with BMJ and keep us informed as to the scope, progress and outcome of its investigation (subject to confidentiality or other applicable legal requirements).

#### **F. Consequences of a breach**

In the event of a non-compliance with any of the requirements of this Code, the BMJ reserves the right to require the Supplier in question to:

1. Demonstrate material progress towards compliance with the requirement(s) in question within a defined and reasonable time period; and/or
2. Bring itself into full compliance with the requirement(s) in question within a defined and reasonable time period.

In the event of serious, material and/or persistent non-compliance, or where a Supplier otherwise demonstrates inadequate commitment, persistent inaction or a lack of improvement, we reserve the right to terminate the business relationship with the Supplier in question.

#### **G. Human rights**

We are committed to applying the Indonesian Law and regulation and by extension, respecting human rights in our own operations and our supply chain.

#### **H. Respecting human rights**

We expect our Suppliers to conduct their operations in a way that respects the fundamental human rights of others, as affirmed by the Universal Declaration of Human Rights. This includes (but is not limited to) their own Workers and people working for their Suppliers.

Suppliers should seek to identify potential and actual adverse human rights impacts related to their activities and business relationships.

They should take appropriate steps to ensure their operations do not contribute to human rights abuses, and to remedy any adverse impacts directly caused, or contributed to, by their activities or business relationships.

For their own Workers, we expect Suppliers (at a minimum) to meet the following requirements.

#### **I. Equality and no discrimination**

Suppliers must provide equal opportunities to, and fair treatment of, all Workers.

This should include:

1. Working to eliminate any form of harassment and bullying within the workplace, whether it is of a sexual, verbal, non-verbal or physical nature; and

2. Treating all Workers with dignity and respect, promoting diversity and inclusion, and not practicing any form of unlawful discrimination. Discrimination can include (but is not limited to) allowing race, ethnicity, color, gender, age, disability, gender identity, gender reassignment, class, religion, politics, marital status, pregnancy status, union membership or any other characteristic protected by law to influence our judgement when it comes to the recruitment, development, advancement or exit of any employee.

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