

Bonhill Group plc

Business partner Code of Conduct

June 2018

1. Policy governance

- Policy owner: Audit & Risk Committee.
- Published: June 2018.
- Applicable: This policy is applicable to all staff, contractors and those persons acting on Bonhill's behalf in the UK and overseas.
- General enquiries: COO

2. Introduction

Bonhill is an international B2B media company providing Business Information, Live Events and Data & Insight products and services to communities in the Diversity, Financial and Technology sectors. We have high standards and values around how our businesses operate and how we interact with our communities, colleagues and Business Partners. Bonhill works with a range of Business Partners and aims to create sustainable and long term relationships with suppliers, contractors, agents and other partners that have a positive impact on all parties.

When selecting Business Partners, we seek to work with those that share Bonhill's commitment to conducting business in an ethical, lawful and socially responsible manner, and expect Business Partners to follow the principles laid out in this Code as well as all applicable global and national laws, regulations and industry standards.

This Code applies to all Bonhill Business Partners including its suppliers, contractors, agents and any other parties engaged with the company.

Business Partners are expected to follow the principles set out in this Code and to communicate them, as well as Bonhill's whistleblowing process, to any team engaged in work for Bonhill. This includes any employee or officer, consultant, or sub-contractor and any agents engaged by the Business Partner.

For any areas where there is a discrepancy between applicable laws and this Code, Business Partners should adhere to whichever is more stringent, or discuss the situation with their usual Bonhill contact to establish an appropriate course of action.

3. Working and employment conditions

Bonhill is committed to working with Business Partners who create a professional, positive, inclusive and safe workplace where core labour standards and human rights are respected.

- **Respect and dignity:** Business Partners are expected to have a commitment to treat their workers with respect and dignity. Workers shall not be threatened with or subjected to any form of harassment or inhumane treatment, including threats of violence, corporal punishment or any other form of physical, sexual, psychological or verbal coercion, harassment or abuse.

- **Equal opportunities and non-discrimination:** Business Partners are also expected to uphold practices that strive to ensure equal treatment in hiring, compensation, access to training and career progression, termination or retirement according to local laws and regulations. Bonhill's Business Partners should not discriminate in their relationships with workers or with other parties, or tolerate discrimination by their workers against others with regard to gender or sexual orientation, physical attributes or condition (including pregnancy), age, ethnic or national background, marital status, religious beliefs (or absence of religious beliefs) or political affiliation.
- **Health and safety:** The welfare of colleagues, our communities and Business Partners is paramount, and each of us should be able to come to work and return home safely and in good health. Business Partners share a responsibility to establish a safe working environment and should provide and maintain access to appropriate training, support and protective equipment for workers, in compliance with all applicable laws and regulations. Business Partners should support individuals in speaking up, if they observe dangerous circumstances or behaviour.
- **Compensation and working hours:** All applicable laws and regulations on wages, benefits and working hours, as well as any contributions legally required such as pension or tax payments, must be followed by Bonhill's Business Partners. Bonhill expects its Business Partners to pay fair wages and benefits in line with industry and geography standards. In addition, no-one should be required to work excessive hours if this impacts on personal health and safety.
- **Child labour:** Business Partners must not engage in, work with or subcontract to any third party that engages in the use of child labour which:
 - Impacts on their health, safety or development, or the legal requirement for education.
 - Contravenes applicable local or national laws or regulations.
 - Contravenes any other bilateral or other contractual agreement, where these are more stringent.
- **Modern slavery:** Bonhill is committed to ensuring that its supply chain is operated free from modern slavery and human trafficking. Business Partners must not engage in, work with or subcontract to any third party that engages in the following practices:
 - The use of forced, coerced or otherwise involuntary labour, whether by actual or threatened means.
 - The use of any methods to prevent free movement of labour, such as withholding identity documents or earned payments.
 - The use, enabling or facilitation of human trafficking.

4. **Business integrity**

Bonhill is committed to working with integrity and in a fair and ethical way within the communities and markets in which the company operates, and to providing reliable and trusted products and services.

- **Bribery and corruption:** Bonhill has zero tolerance of bribery, regardless of location and business operation. It is expected that the company's Business Partners, especially those acting as Bonhill's agents, will demonstrate the same commitment. Business Partners should not tolerate, permit or engage in any form of bribery or corruption, whatever the value or nature of the bribe, whether offered, requested, given or received, directly or indirectly. Appropriate internal controls should be in place and accurate books and records maintained to reflect the transparency and integrity of their business dealings.
- **Trade sanctions:** Business Partners must not engage in trade with persons or entities subject to trade sanctions or restrictions, under applicable laws and regulations.
- **Competition law:** Bonhill conducts our business equitably and in compliance with fair competition laws and regulations. The company will not enter into agreements with any Business Partner to divide, control or otherwise manipulate a marketplace or its associated products.

- **Conflicts of interest:** Business Partners should avoid situations where a conflict of interest could interfere or give the appearance of interfering with a Bonhill business relationship. Business Partners should inform their Bonhill point of contact immediately if any such situation arises.
- **Tax:** Bonhill expects all Business Partners to take a responsible and ethical approach to tax matters and abide by all applicable tax laws.

5. Handling information and data

Bonhill is committed to maintaining the accuracy, integrity, confidentiality and availability of personal data entrusted to the company by its communities, and to protecting the data and information produced by the company. Business Partners are requested to look after that information and data with the same degree of care and respect.

- **Confidential and proprietary information:** Business Partners should ensure that all Bonhill's confidential, personal and proprietary information, is handled and protected appropriately and used only for its designated business purpose, including information on business affairs, intellectual property, trade secrets, product information, customer information and colleague data. It must not be shared further without explicit authorisation, and Business Partners should never make use of, or disclose, Bonhill's information for commercial or private benefit.
- **Personally identifiable information:** Business Partners must handle all personally identifiable information, and in particular sensitive personal information, responsibly and in compliance with all applicable data protection and privacy laws. Particular attention should be paid to any transfer of data across international borders and to ensuring that any proposed use of data is consistent with the original purposes for which it was gathered and consent given.
- **Information security and technology:**
 - Business Partners are expected to maintain best practice information security protocols and have appropriate policies, procedures and systems in place. They should ensure that all information is protected from the full range of threats, including leaks, hacks and information being mislaid or otherwise unlawfully made public or shared
 - Business Partners who are given use of or access to Bonhill's systems, databases, hardware, or other aspects of our technology systems, must adhere to any policy that is provided and designed to safeguard this infrastructure. Any actual or suspected security breach, unauthorised disclosure or loss of any confidential, proprietary or personally identifiable information must be promptly notified to Bonhill

6. Environment and communities

The impact that the company's business activities have on the environment and the communities around us is taking seriously at Bonhill. The company asks that its Business Partners take a similarly considered and responsible approach to managing how the resources on which each of us depend are used.

- **Environment:** Business Partners should act responsibly with regard to the environment and demonstrate commitment to reducing their environmental impact. As a minimum, Business Partners must comply with all applicable local and global environmental laws and regulations, and ensure the correct permits to operate are in place. Business Partners that supply timber and paper products to Bonhill are expected to source from FSC or PEFC accredited suppliers as far as possible. See the Bonhill Timber and Paper Sourcing Policy for more information.
- **Communities:** It is important that Business Partners act responsibly with regard to the societies in which they operate, ensuring that the impact created is a positive one.

7. Working with Bonhill

It is Bonhill's aim to develop long term relationships with Business Partners, based on mutual respect, integrity and honesty.

- **Honesty and integrity:** We expect our Business Partners to be honest in their dealings with the company and others, maintaining accurate records of business transactions and not knowingly providing false information.
- **Compliance and audit:**
 - Bonhill reserves the right to check compliance with this Code, with reasonable notice and may require remedial action from Business Partners if material breaches are discovered.
 - Where there are severe violations of any of the core principles of this Code, where Business Partners are not willing to address violation, or where the principles are repeatedly breached, Bonhill reserves the right to terminate the business relationship. For further information about any of the principles outlined in this Code please contact the company's COO.
- **Business continuity:** It is the responsibility of Business Partners to be prepared for any disruptions to their business where this impacts on an agreement or commitment to Bonhill. Examples could include natural disasters, fire, terrorism, software viruses and political disruption.
- **Speak up:**
 - If in the course of a relationship with Bonhill, a Business Partner observes any behaviour that violates the law or does not meet the requirements of this Code, we want to hear about it. Report any concerns to your usual Bonhill contact or the company's COO.
 - Bonhill's confidential whistleblower process is also available for anyone wishing to report a concern relating to the company.
 - Bonhill takes a zero tolerance stance to retaliation against those who report in good faith. Every report is taken seriously and the company will not tolerate any reprisal against a Business Partner who has shared a concern or assisted with an investigation by a Bonhill colleague.