



# Big Yellow Group

## Supplier Code of Conduct

|                    |                                       |
|--------------------|---------------------------------------|
| Document Ref:      | BYG-GOV-002: Supplier Code of Conduct |
| Version:           | 002                                   |
| Dated:             | 07/10/2026                            |
| Document Author:   | R Wheeler                             |
| Document Owner:    | Financial Controller                  |
| Document Approver: | Chief Financial Officer               |

| Area code | Covers                         | Area code | Covers            |
|-----------|--------------------------------|-----------|-------------------|
| SUS       | Sustainability and ESG         | HS        | Health and safety |
| PTD       | People, Talent and Development | CON       | Construction      |
| GOV       | Governance, Company Secretary  | IT        | IT and data       |
| FIN       | Finance                        |           |                   |

## General information

|                                                                                                                                                                                 |                                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| Purpose of document                                                                                                                                                             |                                  |
| Sets out the standards Big Yellow expects of its suppliers and their supply chains on ethics, health and safety, the environment, labour and human rights, and data protection. |                                  |
| Review frequency                                                                                                                                                                |                                  |
| Annually                                                                                                                                                                        |                                  |
| Definition and interpretation                                                                                                                                                   |                                  |
| Please explain any acronyms and terms here that feature in the document                                                                                                         |                                  |
| SBTi                                                                                                                                                                            | Science Based Targets initiative |

## Revision History

| Version | Date      | Revision Author | Summary of Changes             |
|---------|-----------|-----------------|--------------------------------|
| 001     | July 2025 | S Beavis        | Document Creation              |
| 002     | Oct 2026  | R Wheeler       | Format change & clause updates |
|         |           |                 |                                |
|         |           |                 |                                |
|         |           |                 |                                |
|         |           |                 |                                |
|         |           |                 |                                |

## Distribution and links

|                   |                                                                                                                                                                 |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Applies to        | Whole Company                                                                                                                                                   |
| Corporate Website | <a href="https://corporate.bigyellow.co.uk/sustainability/governance-and-policies">https://corporate.bigyellow.co.uk/sustainability/governance-and-policies</a> |
| Intranet          | <a href="#">Finance - Procurement - All Documents</a>                                                                                                           |
| Related documents | Anti-bribery,<br>Whistleblowing<br>Human Rights Policy and Statement                                                                                            |

## Contents

|    |                                                            |    |
|----|------------------------------------------------------------|----|
| 1. | Introduction .....                                         | 4  |
| 2. | General requirements.....                                  | 4  |
|    | Ethical practices .....                                    | 4  |
| 3. | ESG and H&S .....                                          | 5  |
|    | Health & Safety .....                                      | 5  |
|    | Environment.....                                           | 5  |
|    | Responsible sourcing .....                                 | 6  |
|    | Community engagement .....                                 | 6  |
| 4. | People .....                                               | 7  |
|    | Discrimination, fair treatment and equal opportunity ..... | 7  |
|    | Diversity & Inclusion .....                                | 7  |
|    | Respectful workplace .....                                 | 8  |
|    | Child labour .....                                         | 8  |
|    | Modern Day Slavery .....                                   | 8  |
|    | Working hours.....                                         | 9  |
|    | Freedom of association and collective bargaining .....     | 9  |
| 5. | Suppliers.....                                             | 10 |
|    | Fair payment .....                                         | 10 |
|    | Treatment of supply chain .....                            | 10 |
| 6. | Compliance, monitoring and data .....                      | 10 |
|    | Compliance and monitoring.....                             | 10 |
|    | Data protection and data processing.....                   | 10 |
|    | Confidentiality.....                                       | 11 |
|    | Sign off .....                                             | 11 |

## 1. Introduction

We believe we operate our business in an honest, ethical and professional way, striving to ensure our customers, staff and supply chain are always safe and secure. We believe that it is important that this is reciprocated. Our Code of Conduct has been created to set out our expectations and the obligations we have for our suppliers. We believe that they promote a safe and fair working environment if adhered to.

## 2. General requirements

- 2.1. Suppliers shall comply with all relevant laws, regulations and standards in all of the countries in which it operates.
- 2.2. Where any part of this Code conflicts with the contractual terms between Suppliers and any Big Yellow entity, the contractual terms shall take precedence.
- 2.3. Suppliers must take all reasonable steps to ensure that their own suppliers and subcontractors who provide goods or services to Big Yellow, directly or indirectly, comply with the requirements of this Code.

### Ethical practices

#### *Conflicts of Interest*

- 2.3.1. Conflicts of interest run counter to the fair treatment we expect. They can also break the law and seriously damage our integrity and reputation. A conflict of interest occurs when your private interests interfere, or appear to interfere, with the best interest of Big Yellow.
- 2.3.2. Suppliers must avoid all conflicts of interest or situations that may be interpreted as a conflict of interest. Suppliers must promptly report to Big Yellow any instances involving actual or apparent conflicts of interest between the Supplier's interests and those of Big Yellow, such as a direct personal or financial interest in a business decision or supplier selection.

#### *Competition*

- 2.3.3. Competition and anti-trust laws prohibit a variety of business practices that restrict free and fair competition, such as bid rigging, price fixing, cover pricing or market sharing. Violations of such laws are very serious, and can result in significant fines and other penalties, including debarment. Individuals can face prison.
- 2.3.4. Big Yellow is committed to free and open competition in our markets. We compete fairly and ethically, and support laws that promote and protect competition. The decisions we make about pricing, customers, bids and markets are taken by us alone.
- 2.3.5. Suppliers will not share with us information they receive from or about our competitors or their bids, or the bids they are making to our competitors.
- 2.3.6. Suppliers shall always report anti-competitive behaviour if they see it or suspect it.

#### *Anti-bribery and Corruption*

- 2.3.7. Suppliers will not tolerate or enter into any bribery, including improper offers or payments to or from employees, customers, suppliers, organisations or individuals, and any other unethical business conduct.
- 2.3.8. Suppliers will have an anti-bribery policy that sets out the principle of zero tolerance to any form of bribery or corruption within their organisation, including facilitation payments;
- 2.3.9. Suppliers will ensure that all of their employees and contractors are aware of these policies, procedures and safeguards;

- 2.3.10. Suppliers must comply with relevant laws and regulations against all forms of unethical business conduct in the countries in which they operate;
- 2.3.11. Suppliers will have appropriate procedures and safeguards in place to ensure the prevention, detection and reporting of bribery, corruption, fraud and other unethical practices and review these regularly to ensure they are operating effectively;
- 2.3.12. Suppliers will report any concerns of unethical working practices on a confidential basis;
- 2.3.13. Suppliers will act with integrity.

#### *Whistleblowing*

- 2.3.14. Suppliers will have an internal procedure that allows their workers to raise complaints, workplace grievances and whistleblowing concerns, anonymously if they wish and without fear of retaliation, in line with applicable laws and regulations.
- 2.3.15. Suppliers, their employees and subcontractors can raise concerns about fraud, bribery, modern slavery or any other wrongdoing connected with Big Yellow confidentially and anonymously online at <https://bigyellow.ethicspoint.com>. Select the store name from the drop-down list, or 'Prefer Not To Say' if the concern is not linked to a specific location.

### 3. ESG and H&S

#### Health & Safety

- 3.1. Suppliers shall comply with all relevant health and safety laws and regulations applicable to them;
- 3.2. Suppliers will put in place mechanisms to ensure that health and safety obligations are communicated and applied to parties under its control.
- 3.3. Suppliers will ensure they meet general principles of health and safety risk prevention. General principles include identifying, minimising and preventing hazards, using competent and trained people, providing and maintaining safe equipment and tools, including personal protective equipment as required.
- 3.4. Suppliers will develop a Safe System of Work for their work activities through the risk assessment process including, for example, the identification, management and control of hazards, and the provision of adequate safety equipment;
- 3.5. Suppliers will ensure facilities and amenities, including employee accommodation where provided by suppliers, will be hygienic, safe and meet the basic needs of employees.
- 3.6. Suppliers should understand the importance of mental health and wellbeing within their workplace, create an environment that enables their employees to talk openly about their mental health, and support the general wellbeing of their employees.
- 3.7. Suppliers will have systems and training to prepare for and respond to accidents, health problems and foreseeable emergency situations. Suppliers will have means and procedures in place for recording, investigating and implementing learning points from accidents and emergency situations.
- 3.8. Suppliers will have a health and safety management system that is appropriate to the size and nature of their business.

#### Environment

- 3.9. Big Yellow recognises that the world faces a climate emergency and we are committed to playing our part in tackling climate change. Where possible, we favour suppliers and contractors who demonstrate environmentally responsible behaviour.

- 3.10. We ask that Suppliers support us in achieving our carbon reduction targets, including our science-based targets by 2032, in particular by working with us and our partners to find and deliver innovative, low carbon materials and techniques to further reduce the embodied carbon of our developments, and to embed sustainability in our developments from the design phase, taking a full life-cycle approach;
- 3.11. We expect Suppliers to track and reduce their greenhouse gas emissions. We ask them to consider setting their own reduction targets and reporting progress externally and annually, and avoid the use of hydrofluorocarbons and hydrochlorofluorocarbons where possible and adopt climate friendly alternative products.
- 3.12. We would like to work together with our Suppliers on initiatives that minimise adverse impacts on, or benefit, the environment.
- 3.13. Suppliers must obtain, maintain and keep current all necessary environmental permits (e.g. waste management, transportation), approvals and registrations.
- 3.14. Suppliers will have robust environmental management policies and procedures in place.
- 3.15. Suppliers must identify, minimise, monitor, control and treat all hazardous air pollutants and all emissions should be avoided in accordance with international standards and applicable laws.
- 3.16. Suppliers will promote recycling and reduce wastage in materials sourcing, handling, transport and disposal.
- 3.17. Suppliers will seek to reduce their consumption of energy, water and raw materials, and improve energy and carbon efficiency where appropriate.
- 3.18. Suppliers will need to provide emissions data at regular intervals to aid the process of evaluating our Scope 3 emissions.
- 3.19. Suppliers must comply with all relevant environmental laws and regulations, and any environmental industry standards or codes, applicable to them;
- 3.20. Suppliers will minimise the environmental impact of their operations as much as possible;
- 3.21. Suppliers working on our development sites will support our approach to biodiversity, including biodiversity net gain, green roofs and sustainable drainage.

#### Responsible sourcing

- 3.22. We aim to promote the responsible sourcing of materials to support our overall strategy of reducing our carbon footprint. Further, we are committed to ensuring our supply chain for products is free from modern slavery and we aim to work in partnership with our Suppliers to keep achieving this.
- 3.23. Suppliers will have a clear policy or procedure in place to avoid knowingly purchasing conflict minerals.
- 3.24. Suppliers will ensure that materials have been sourced sustainably and transparently
- 3.25. Suppliers will ensure that materials are certified to an industry standard or procured in line with a recognised responsible sourcing scheme, where appropriate
- 3.26. Suppliers will ensure that no modern slavery has occurred within their operations and own supply chain, to produce the goods that they use and avoid toxic and hazardous materials.

#### Community engagement

- 3.27. Big Yellow recognises that small firms, voluntary and community organisations, social enterprises and ethnic-minority businesses are important members of our supply chain. They contribute to local economies and to social cohesion.
- 3.28. We look to our suppliers to hold similar views and expect you to join us in these commitments when we work together.

- 3.29. Suppliers are encouraged to support local community initiatives around our places, where appropriate to their organisation.
- 3.30. Suppliers will seek to develop positive relationships within our local communities.
- 3.31. Suppliers will plan to minimise disruption from their activities and are encouraged to contribute to the sustainability and development of the communities in which they operate.
- 3.32. Suppliers will take a proactive approach in offering local communities and local businesses opportunities to work and engage where appropriate.
- 3.33. Our Suppliers will act in a professional and responsible manner when working on our behalf, either directly or indirectly
- 3.34. Our Suppliers will minimise all adverse effects on the local community when working on our behalf, where applicable
- 3.35. Our Suppliers will develop and maintain good relationships with our customers and neighbours, particularly on our development sites, by showing them due consideration and respect.
- 3.36. We also expect our Suppliers to work with us and our customers to support local businesses and economies; and proactively source labour, goods and services from the local community, where possible.
- 3.37. We are always keen to work in collaboration with our Suppliers on local community engagement programmes and charitable initiatives whenever we can.

## 4. People

### Discrimination, fair treatment and equal opportunity

- 4.1. We want Big Yellow to be a place of mutual trust and respect, which embraces diversity and values everyone for their merits. A place where people's rights are honoured and they are treated fairly and consistently.
- 4.2. We expect our suppliers to do the same. Big Yellow Suppliers must ensure employment – including hiring, payment, benefits, advancement, termination and retirement – is based on ability and not on beliefs or any other personal characteristics.
- 4.3. This includes discrimination based on sex, race, colour, national or ethnic origin, sexual orientation, gender identity or expression, religion, political beliefs, trade union activity, marital status, caring responsibilities, disability, age or citizenship.
- 4.4. Suppliers will also apply a high standard of engagement when liaising with subcontractors, customers and when providing goods or services on any Big Yellow store; ensuring they observe the same requirements, therefore influencing across the supply chain.

### Diversity & Inclusion

- 4.5. Our people are vital to and inseparable from our success, and we are committed to attracting, enhancing and retaining a diverse range of talented individuals in our business. Big Yellow recognises that, as a company, we need to continue to do more to achieve greater diversity and we will support and challenge our Suppliers and partners to do the same for their people.
- 4.6. Suppliers must comply with all relevant equality and equal opportunities laws and regulations in the countries in which they operate; and
- 4.7. Suppliers will have robust policies in place with regards to discrimination and equal opportunities, supporting our belief that everyone deserves to be treated equally.
- 4.8. We hope our Suppliers will have effective procedures in place to safeguard against harassment and discrimination and actively promote diversity and inclusion amongst their employees and within their own workplace.

## Respectful workplace

- 4.9. Every Big Yellow employee has the right to respect and freedom from harassment. Violence at work is unacceptable. We will not tolerate harassment or violence against an employee. We equally expect our suppliers to provide the same commitment.
- 4.10. Big Yellow Suppliers must treat all workers with respect and dignity. No worker will be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse, nor is there to be the threat of any such treatment. In addition, Big Yellow Suppliers will not use monetary fines as a disciplinary practice.

## Child labour

- 4.11. Big Yellow does not use child labour and it expects its suppliers to do the same. We expect our suppliers to comply with local laws regarding the minimum age of employees. The minimum age for workers must not be less than the age of completion of compulsory schooling. In addition, Big Yellow Suppliers must comply with all legal requirements for the work of authorised young workers, particularly those pertaining to hours of work, wages and safe working conditions.
- 4.12. All young workers (persons under the age of 18) must be protected from performing any work that is likely to be hazardous or to interfere with their education or that may be harmful to their health, physical, mental, social, spiritual or moral development.
- 4.13. We encourage our suppliers to participate in legitimate workplace apprenticeship programmes that comply with applicable laws and regulations.
- 4.14. In the event that Suppliers discover a child is employed, the best interests of the child must be the primary consideration. Suppliers will contribute, support and/or develop policies and programmes that assist any child found to be performing child labour. Suppliers must notify Big Yellow of the situation.

## Modern Day Slavery

- 4.15. Suppliers will not use any form of forced, bonded or compulsory labour, slavery or human trafficking. In line with our own commitment Big Yellow Suppliers must not use any type of involuntary or forced labour, including indentured, bonded, slave or human trafficked labour, and never engage in any form of procurement of commercial sex acts.
- 4.16. Supplier's employees will be entitled to leave work or terminate their employment with reasonable notice. Suppliers will provide each of their employees with an employment contract which contains such a reasonable notice period. All work must be voluntary and workers will have the freedom to terminate their employment in accordance with established laws, regulations, and rules.
- 4.17. Suppliers will not require employees to lodge deposits of money, withhold payment, place debt upon employees or require employees to surrender any government-issued identification, passports, or work permits as a condition of employment. Big Yellow expects its suppliers to put in place adequate procedures to ensure that they are not directly or indirectly, through their supply chain, involved in any form of involuntary or forced labour.
- 4.18. Workers will not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries.
- 4.19. When the subcontracting of recruitment and hiring is necessary, companies will ensure that the labour agencies they engage operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places workers at risk of forced labour or trafficking for labour exploitation.

- 4.20. Big Yellow Suppliers will also not mandate that workers hand over government-issued identification, passports or work permits as a condition of employment. The retention of personal documents will not be used as a means to bind workers to employment or to restrict their freedom of movement.
- 4.21. Written contracts of employment will be provided to workers in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours and other working and employment conditions. This will be provided prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.
- 4.22. The workplace will be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures will be clearly defined and communicated to all workers, and will not include any inhumane disciplinary measure, including any corporal punishment, mental or physical coercion, or verbal abuse of workers; nor will they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour.
- 4.23. The use or threat of physical or sexual violence, harassment and intimidation against a worker, his or her family, or close associates, is strictly prohibited.
- 4.24. The Supplier agrees to conduct its business in full compliance with all applicable laws, regulations, and internationally recognised human rights standards. The Supplier must respect, comply with and promote human rights as set out in the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights as may be updated from time to time.

#### Working hours

- 4.25. Big Yellow Suppliers must ensure that regular working hours do not exceed 48 hours a week, and that total hours, including overtime, do not exceed 60 hours a week, except in exceptional circumstances. All overtime must be voluntary and paid at a premium rate. In addition, except in exceptional circumstances, all workers are entitled to at least one day off in every seven day period.
- 4.26. Suppliers will give workers clear written information about their pay for each pay period, including their rate of pay, hours worked and any deductions.
- 4.27. Suppliers will grant its employees the right to paid vacation.
- 4.28. Suppliers will not operate exclusive zero hours contracts.

#### Freedom of association and collective bargaining

- 4.29. Suppliers will respect the rights of employees to join or not to join trade unions or similar representative bodies and the rights of employees to collective bargaining to the extent permitted by applicable law. Suppliers will allow open communication and direct engagement between its employees and management in building employee relations and for the resolution of any issues.
- 4.30. Big Yellow recognises the importance of open communication and direct engagement between workers and management and expects its suppliers to do the same. Big Yellow Suppliers are to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. We also expect our suppliers to recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing. Big Yellow Suppliers also must respect any legal right of workers to bargain collectively.

## 5. Suppliers

### Fair payment

- 5.1. In the spirit of partnership, we treat our Suppliers well and ensure that they are paid on time. We are committed to paying all our Suppliers on time and fairly and we are a signatory to the UK Fair Payment Code. More information can be found on the UK Fair Payment Code at <https://www.smallbusinesscommissioner.gov.uk/new-fair-payment-code/>.
- 5.2. Suppliers are also encouraged to adopt prompt payment for its subcontractors, in line with the Fair Payment Code principles.

### Treatment of supply chain

We expect suppliers to deal fairly with the subcontractors and suppliers in their supply chain. We expect suppliers to avoid passing down unreasonable levels of risk to subcontractors who cannot reasonably be expected to manage or carry these risks. We expect suppliers not to create barriers to the use of small and medium-sized enterprises who are qualified to provide goods or services, and to encourage innovation in their supply chains to increase the value or quality of supply.

## 6. Compliance, monitoring and data

### Compliance and monitoring

- 6.1. We expect our Suppliers to be able to demonstrate compliance with at least the minimum standards set out in this Supplier Code of Conduct. We have outlined how we will work in collaboration with our Suppliers, and we invite them to work with us where possible. The commitment and observance of this Code will be considered as part of the decision-making process when renewing or appraising existing relationships and selecting new suppliers. Our tier one suppliers sign this Code when they are appointed. Compliance with this Code is a contractual requirement under our standard procurement terms and conditions.
- 6.2. Big Yellow reserves the right to do announced and unannounced inspections of suppliers conducting Big Yellow work, to ensure compliance with this Code. Big Yellow Suppliers must maintain documents necessary to demonstrate compliance with the Code. Big Yellow Suppliers must allow representatives from Big Yellow full access to facilities, documents, worker records and workers for confidential interviews in compliance with local laws.
- 6.3. Big Yellow Suppliers are expected to take necessary corrective actions to promptly remedy any identified non-compliance. Big Yellow reserves the right to terminate its business relationship with any Big Yellow Supplier who is unwilling or unable to comply with this Code.
- 6.4. We encourage Big Yellow Suppliers to communicate to us any actions taken to improve their business practices and to send us suggestions about how Big Yellow can best contribute to the implementation of the principles set out in this Supplier Code of Conduct.

### Data protection and data processing

- 6.5. Suppliers will comply with all applicable data privacy laws in relation to its use, processing and storage of personal data.
- 6.6. Big Yellow recognises its duty to respect personal information and ensure it is protected and handled responsibly and only used for the purposes for which it is provided.
- 6.7. Suppliers must ensure that all personal information is controlled in accordance with, and their data and information systems comply with, applicable laws and regulations.
- 6.8. Suppliers will monitor and ensure their third parties are compliant with data privacy laws and have the adequate safeguards in place to protect data.

- 6.9. Suppliers will notify Big Yellow as soon as they become aware of a data breach or any unauthorised access into their information systems.
- 6.10. Big Yellow expects its suppliers to manage personal information in accordance with the following Data Protection Principles.
- 6.11. Suppliers will process personal information fairly and lawfully.
- 6.12. Suppliers will obtain personal information only for specified, explicit and legitimate purposes.
- 6.13. Suppliers will ensure personal information is adequate, relevant and not excessive
- 6.14. Suppliers will ensure personal information is accurate and, where necessary, kept up to date.
- 6.15. Suppliers will not keep personal information for longer than is necessary.
- 6.16. Suppliers will process personal information in accordance with rights of the individual.
- 6.17. Suppliers will keep personal information secure.
- 6.18. Suppliers will not transfer personal information unless there is adequate protection in place.

#### Confidentiality

- 6.19. Information for us is confidential if it has value to Big Yellow and is not publicly available. You might also obtain confidential information from our employees, customers, partners and others. Big Yellow employees and suppliers have a responsibility to keep confidential information safe and make sure it never gets into the wrong hands.
- 6.20. Suppliers must take all due care in handling, discussing or transmitting sensitive or confidential information that could affect the company, its employees, its companies, the business community or the general public. Disclosure of financial information could influence the actions of shareholders and potential investors and possibly violate securities law.
- 6.21. Suppliers' responsibility to hold the company's confidential information as confidential is a continuing obligation even after their assignment or contract with Big Yellow has ended.
- 6.22. If a Big Yellow supplier believes that it has been given access to the company's confidential information in error they will immediately notify their contact at the company and refrain from further distribution.
- 6.23. To protect others confidential information, Big Yellow Suppliers similarly will not disclose to anyone at Big Yellow company information related to any other company if suppliers are under contractual or legal obligation not to share that information.

#### Sign off

|                                                                                     |              |
|-------------------------------------------------------------------------------------|--------------|
|  |              |
| John Trotman<br>Chief Financial Officer                                             | October 2026 |