

1 Overview

Bluesource Information Limited (“**the Company**”) is committed to conducting its business ethically, lawfully and with integrity.

This Code of Conduct (“**the Code**”) defines the standards of behaviour expected of all employees, workers, contractors, and third parties acting on behalf of the Company.

This Code forms part of the Company’s Information Security Management System (ISMS) and wider governance framework and must be read alongside the Company’s [Employee Handbook](#), [Sustainability Policy](#), [Supplier Code of Conduct Policy](#), and supporting corporate policies (such as its [Equality, Diversity & Inclusion Policy](#), and [Corporate and Social Responsibility Policy](#)).

2 Purpose

The purpose of this Code is to:

- Define clear expectations of professional, ethical, and lawful behaviour across the Company;
- Support compliance with applicable legal, regulatory, and contractual obligations;
- Align individual and organisational conduct with the Company’s values, culture, and governance framework; and
- Reinforce the Company’s commitment to responsible business practices as set out in its [Corporate and Social Responsibility Policy](#), including alignment with the United Nations Global Compact (UNGC) Ten Principles, as follows:

Human Rights (UNGC Principles 1–2)

- Support and respect the protection of internationally proclaimed human rights;
- Ensure the Company is not complicit in human rights abuses;

Labour Standards (UNGC Principles 3–6)

- Uphold freedom of association and the effective recognition of the right to collective bargaining;
- Eliminate forced or compulsory labour;
- Abolish child labour;
- Eliminate discrimination in respect of employment and occupation;

Environment (UNGC Principles 7–9)

- Support a precautionary approach to environmental challenges;
- Undertake initiatives to promote greater environmental responsibility;
- Encourage the development and adoption of environmentally friendly technologies and practices, in line with the Company’s [Sustainability Policy](#);

Anti-Corruption (UNGC Principle 10)

- Work against corruption in all its forms, including extortion and bribery, in accordance with the Company's [Anti-Bribery and Corruption Policy](#);
- Reinforce obligations relating to:
 - Information security and data protection (ISO/IEC 27001-aligned policies);
 - Professional conduct and behavioural standards (as set out in the [Employee Handbook](#)); and
 - Ethical, legal, and responsible business conduct across all operations and relationships.

3 Scope

This Code applies to:

- All employees (permanent, temporary, and fixed-term);
- Contractors, consultants, and agency workers; and
- Suppliers and third parties acting on behalf of the Company.

Supplier-specific ethical, compliance and operational requirements are further defined within the [Supplier Code of Conduct \(BSCD26\)](#), and should be applied in conjunction with this Code where relevant.

4 Individual Responsibility and Compliance

All individuals within the scope of this Code are required to **read, understand, and comply** with its provisions and all associated Company policies.

Compliance with this Code is a **condition of employment or engagement**, and individuals are expected to exercise sound judgment and seek guidance where requirements are unclear.

Failure to comply may result in disciplinary, contractual, or legal action, as set out in this Code and the Company's Compliance Policy.

5 Standards of Conduct

All individuals must:

- Act honestly, professionally, and with integrity;
- Comply with relevant Company policies and all applicable laws and regulations, including those of the United Kingdom and any other jurisdiction in which the Company operates, applying the higher standard where differing legal or regulatory requirements exist;
- Protect Company assets, information, and reputation; and
- Avoid conduct that could harm the Company or its stakeholders.

Further behavioural expectations are detailed within the Employee Handbook (Conduct and Behaviour sections).

6 Business Ethics and Integrity (UNGC Principle 10)

The Company operates a zero-tolerance approach to:

- Bribery, corruption, fraud, and money laundering;
- Improper gifts or inducements; and
- Undeclared conflicts of interest.

All individuals must:

- Disclose conflicts of interest promptly;
- Make decisions objectively and in the Company's best interests;
- Comply with the [Anti-Bribery and Corruption Policy](#) and Fraud Prevention controls.

Accurate Records and Documentation

All individuals must ensure that Company records, including financial, operational, and contractual records:

- Are accurate, complete, and maintained in a timely manner;
- Reflect transactions truthfully; and
- Are not altered, falsified, or misrepresented.

Accurate record-keeping supports legal compliance, financial integrity, and the Company's governance framework.

Conflicts of Interest

A conflict of interest arises where an individual's personal, financial, or other interests could interfere, or appear to interfere, with their ability to act in the best interests of the Company.

Examples may include (but are not limited to):

- Financial interests in a customer, supplier, or competitor;
- Personal relationships that influence business decisions;
- External employment, consultancy, or business activities; or
- Receiving personal benefits from third parties.

All individuals must:

- Avoid situations that give rise to actual or perceived conflicts of interest;
- Disclose any potential or actual conflicts promptly to their manager or the Head of Operations; and
- Comply with any mitigation measures put in place by the Company.

Conflicts of interest must be managed transparently and in accordance with the Company's ethical and governance standards.

Fair Dealing and Customer Relationships

The Company is committed to dealing fairly, honestly, and transparently with its customers, suppliers, and business partners.

Individuals must:

- Provide accurate and truthful information;
- Avoid misleading statements or misrepresentation; and
- Conduct business in a manner that upholds the Company's reputation for integrity and professionalism.

7 Outside Employment and Other Interests

Individuals must ensure that any external employment, consultancy, directorships, or business interests do not conflict with the Company's interests or adversely affect their ability to perform their role.

Relevant outside interests must be disclosed where there is a potential for conflict or perceived conflict and must comply with Company policies and contractual obligations.

8 Human Rights, Equality and Respect (UNGC Principles 1–6)

The Company is committed to:

- Respecting internationally recognised human rights;
- Providing a workplace free from discrimination, harassment, or victimisation; and
- Promoting equality, diversity, and inclusion.

Individuals must:

- Treat others with dignity and respect; and
- Not engage in or tolerate inappropriate behaviour.

For more detailed information, please also refer to the Company's [Employee Handbook](#) (Equality, Dignity at Work, Disciplinary Sections) and its topic specific policies on:

- [Anti-Slavery and Human Trafficking](#);
- [Child Labour](#); and
- [Equality, Diversity & Inclusion Policy](#).

9 Information Security and Data Protection

All individuals must:

- Protect Company and customer information in accordance with the ISMS;
- Comply with UK GDPR, EU GDPR, and Company privacy policies;
- Use Company systems and assets securely and responsibly;
- Immediately report security incidents.

This includes compliance with:

- The Company's [Information Security Policy](#) (ISO/IEC 27001-aligned);
- The Company's [Acceptable Use](#), [Data Processing](#) and [Privacy](#) policies; and
- Acceptable Use provisions within the [Employee Handbook](#).

10 Health, Safety and Environment (UNGC Principles 7–9)

All individuals must:

- Take reasonable care for their own health and safety and that of others;
- Follow all [Health and Safety Policy](#) requirements; and
- Support environmentally responsible practices.

The Company commits to:

- Reducing environmental impact in line with its [Sustainability Policy](#); and
- Promoting safe and responsible working environments.

11 Professional Conduct in the Workplace

Individuals are expected to:

- Behave professionally and respectfully at all times;
- Communicate appropriately and constructively; and
- Adhere to Company behavioural standards.

Unacceptable conduct includes:

- Bullying, harassment, or discrimination;
- Misuse of Company systems or resources;
- Breaches of confidentiality; and
- Further detail is provided in the [Employee Handbook](#).

12 Social Media and External Communications

Individuals must ensure that any public communications, including social media activity, do not:

- Misrepresent the Company or its services;
- Disclose confidential or sensitive information; or
- Damage the Company's reputation or relationships.

Where individuals identify themselves as associated with the Company, they must ensure that their conduct is consistent with the standards set out in this Code.

13 Use of Company Assets

Company assets and those entrusted to it (including IT systems, data, and intellectual property) must:

- 🔵 Be classified and handled appropriately in accordance with the Company's [Data Classification](#) and [Asset Management](#) policies;
- 🔵 Be reused and disposed of in accordance with the Company's [Reuse and Destruction Policy](#);
- 🔵 Be used only for legitimate business purposes;
- 🔵 Be protected from unauthorised access, loss, or misuse; and
- 🔵 Not be removed or copied without authorisation.

For more detailed information on the use of assets, please refer to the topic specific policies detailed above.

14 Gifts and Entertainment (Aligned to Anti-Corruption Policy)

The Company recognises that practices relating to gifts and hospitality may vary between organisations, countries, and cultures. However, all gifts and hospitality - whether given or received - must be managed in a manner that is lawful, proportionate, transparent, and consistent with the Company's zero-tolerance approach to bribery and corruption.

Gifts, hospitality, or business courtesies must not be offered, provided, or accepted where they are intended to influence, or could reasonably be perceived as influencing, a business decision, securing a commercial advantage, or creating an improper obligation.

All individuals must ensure that any gifts or hospitality:

- 🔵 Are not offered, promised, given, or accepted with the intention of obtaining or retaining business or a business advantage
- 🔵 Are reasonable, proportionate, and appropriate in value, timing, and context;
- 🔵 Are provided openly and transparently, and not in secret;
- 🔵 Comply with applicable law, the Company's Anti-Corruption and Anti-Bribery Policy, and internal approval requirements;
- 🔵 Do not include cash or cash equivalents; and
- 🔵 Are not offered to, or accepted from, Public Officials or political representatives.

Suppliers, contractors, and third-parties acting on behalf of the Company are expected to adhere to the same standards and must not provide gifts, hospitality, fees, or other benefits that could influence, or appear to influence, the Company's decision-making.

All gifts and hospitality must be assessed, approved, and recorded in accordance with the Company's [Anti-Corruption and Anti-Bribery Policy](#), including applicable approval thresholds and register requirements.

Failure to comply with these requirements may constitute a breach of both this Code and the [Anti-Corruption and Anti-Bribery Policy](#) and may result in disciplinary, contractual, or legal action.

15 Reporting Concerns and Whistleblowing

The Company is committed to fostering an open and transparent speak-up culture, where individuals feel confident raising concerns in good faith.

Raising concerns is both a right and a responsibility, and individuals are encouraged to report issues at the earliest opportunity.

Concerns relating to ethical or business conduct matters, including accounting, internal accounting controls or auditing matters, should be brought to the Company's attention and may be made anonymously and confidentially.

All individuals must:

- Report suspected misconduct, illegal activity, or breaches of this Code including concerns relating to ethical or business conduct matters, including accounting, internal accounting controls or auditing matters; and
- Use the Company's formal Whistleblowing Policy (detailed in the [Employee Handbook](#)) or escalated to the Company's senior management.

Suppliers should report concerns about potential legal, regulatory or ethical misconduct, such as concerns regarding:

- regulatory compliance;
- bribery or other improper payments;
- potential money laundering or other suspicious activity;
- inappropriate conflicts of interest;
- the integrity of Bluesource's accounting practices, internal controls, auditing matters or public filings; and
- improper or questionable behavior by employees, supervisors, clients, counterparties, consultants, suppliers or other third parties.

The Company:

- Treats reports confidentially; and
- Prohibits any form of retaliation, victimisation, or detrimental treatment against individuals who raise concerns in good faith, even where such concerns are ultimately unsubstantiated.

16 Monitoring, Assurance and Compliance

The Company monitors adherence to this Code of Conduct as part of its wider compliance and governance framework, including its Compliance Policy, Information Security Management System (ISMS), and related assurance activities.

Monitoring activities may include, where appropriate:

- Review of compliance with this Code and associated Company policies, including the [Employee Handbook](#), [Sustainability Policy](#), and [Anti-Corruption and Anti-Bribery Policy](#);
- Internal audits, control assessments, and management reviews;
- Objective setting, metrics, tracking and review;
- Review of security, ethical, legal, and sustainability practices;
- Assessment of third-party and supplier compliance through due diligence, certifications, or assurance activities; and
- Investigation of suspected or reported breaches in line with the Company's [Compliance Policy](#) and Whistleblowing procedures.

All individuals, including employees, contractors, and third parties, are required to:

- Cooperate with monitoring, audit, and assurance activities;
- Provide accurate and complete information when requested; and
- Support investigations into potential breaches of this Code or associated policies.

Where non-compliance is identified, the Company will:

- Assess the nature, severity, and impact of the issue;
- Implement proportionate corrective or remediation actions; and
- Monitor progress against agreed improvement or corrective action plans.

Failure to comply with this Code or to cooperate with monitoring and assurance activities may result in:

- Disciplinary action (for employees);
- Contractual or commercial action (for third-parties and suppliers), including suspension or termination; and/or
- Legal or regulatory escalation where appropriate.

Bluesource is committed to working in good faith with individuals and third parties to address compliance issues and to promote continuous improvement, whilst maintaining a zero-tolerance approach to serious breaches, particularly those relating to legal, ethical, or regulatory obligations.

Suppliers

Bluesource may require suppliers to:

- Provide evidence of compliance (e.g. policies, certifications, assessments).
- Participate in security, ethical, or sustainability reviews.
- Support investigations relating to breaches of this Code.

Failure to meet these requirements may result in remediation plans, suspension, or termination of the supplier relationship.

Bluesource will endeavor to work with its Suppliers to ensure they are compliant and where necessary, review any identified corrective action plans. Failure to meet these requirements may result in remediation plans, suspension, or termination of the supplier relationship.

17 Roles, Responsibilities and Accountability

Organisational Responsibilities

Bluesource is responsible for:

- Establishing, maintaining, and periodically reviewing this Code of Conduct to ensure its continued suitability, adequacy, and effectiveness in line with the Company's governance framework and [Compliance Policy](#);
- Communicating this Code and associated expectations clearly to employees, contractors, and relevant third parties;
- Implementing proportionate monitoring, assurance, and governance activities to support compliance with legal, regulatory, ethical, and contractual obligations;
- Maintaining appropriate oversight, escalation, and enforcement mechanisms to address potential or actual breaches of this Code;
- Taking proportionate and risk-based action where non-compliance is identified, including corrective actions, disciplinary measures, or contractual remedies where applicable;
- Ensuring appropriate training and awareness activities are implemented and maintained to support understanding of this Code;
- Maintaining appropriate records of policy acceptance, acknowledgement (where applicable), and compliance activities in line with the Company's governance framework; and
- Establishing controls to identify, assess, and manage conflicts of interest across the organisation.

Supplier and Third-Party Responsibilities

Suppliers and third parties acting on behalf of the Company are expected to:

- Comply with the general standards of conduct set out in this Code;
- Complete any required training and awareness activities relating to this Code;
- Disclose conflicts of interest and relevant outside interests in a timely manner;
- Report actual or suspected breaches, concerns, or misconduct; and
- Adhere to all applicable contractual, legal, and regulatory obligations.

More detailed requirements relating to supplier behaviour, ethical standards, due diligence, and supply chain expectations are defined within the Company's [Supplier Code of Conduct Policy \(BSCD26\)](#), which must be complied with where applicable.

Individual Responsibilities

All individuals (including employees, workers, contractors, and relevant third-party personnel) are required to:

- Act in a lawful, ethical, and professional manner at all times;
- Comply with this Code and all relevant Company policies, including where applicable, the [Employee Handbook](#);
- Protect Company assets, information, and reputation in accordance with the Company's information security and data protection requirements;
- Avoid conduct that could expose the Company or its stakeholders to legal, regulatory, or reputational risk;
- Completing required training and awareness activities relating to this Code;
- Disclosing conflicts of interest and relevant outside interests in a timely manner; and
- Report actual or suspected breaches, concerns, or misconduct in accordance with the Company's Whistleblowing Policy and escalation procedures.

RACI table

The following RACI matrix defines the roles and responsibilities for the implementation, monitoring, and enforcement of this Code of Conduct, in alignment with the Company's Compliance Policy and wider governance framework.

It provides clarity on accountability across key functions, ensuring that responsibilities for communication, oversight, monitoring, investigation, and continuous improvement are clearly assigned and consistently applied across the organisation and, where applicable, to third-party relationships.

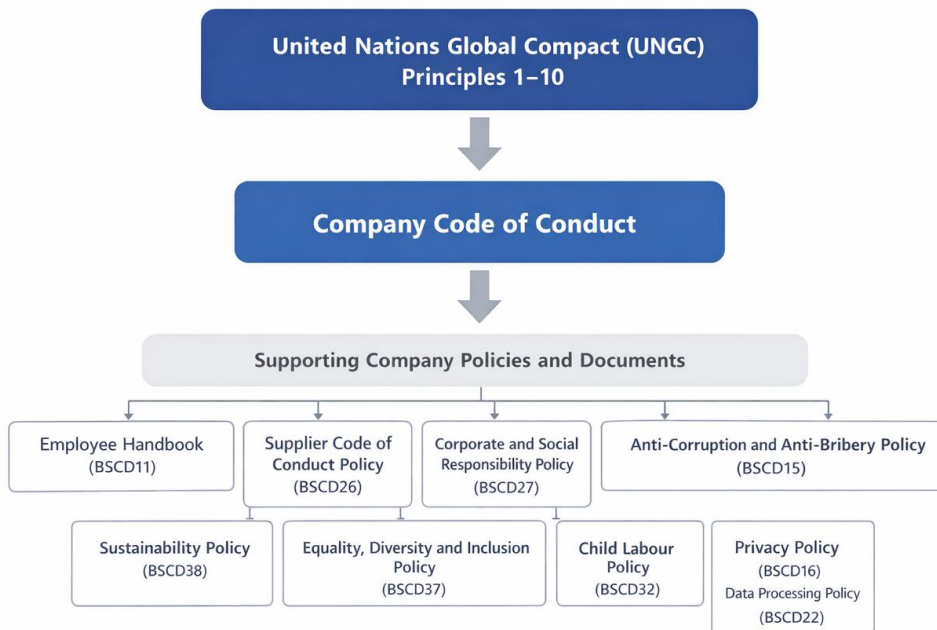
The RACI model should be read in conjunction with this Code and supporting policies, including the Employee Handbook, Supplier Code of Conduct Policy (BSCD26), and other relevant corporate policies forming part of the Company's compliance and assurance framework.

Activity	Head of Operations	IT / Operations Management	System & Service Owners	Third Party Providers	Internal Audit / ISMS
Define and maintain Code of Conduct	A/R	C	C	I	C
Communicate Code and expectations	A	R	R	I	I
Monitoring and assurance activities	A	R	R	C	R/A
Investigation of breaches	A/R	R	C	C	C
Enforcement (disciplinary / contractual)	A/R	C	C	I	C
Continuous improvement and review	A	R	C	I	R
Supplier compliance (via BSCD26)	A	R	C	R	C
Training and Awareness	A	R	R	I	C
Conflicts of interest management	A	R	R	C	C
Policy acknowledgement and compliance tracking (where applicable and not implied)	A	R	C	C	C

Legend:

- R = Responsible
- A = Accountable
- C = Consulted
- I = Informed

18 Applicability of Company Policies and Supporting Documents



This Code of Conduct forms part of Bluesource’s wider governance, compliance, and ethical framework and must be read in conjunction with other Company policies and supporting documents.

The Code establishes overarching principles of behaviour and conduct in line with the UN Global Compact’s 10 Principles, where applicable. It is supported by a suite of topic-specific policies that define more detailed requirements, controls, and procedures in relevant areas.

The following policies are directly applicable to, and operate in conjunction with, this Code:

- [The Employee Handbook \(BSCD11\)](#), which sets out detailed expectations relating to conduct, behaviour, disciplinary processes, acceptable use, and workplace standards;
- [The Supplier Code of Conduct Policy \(BSCD26\)](#), which defines specific ethical, legal, and compliance requirements applicable to suppliers and third-party providers acting on behalf of the Company;
- [The Corporate and Social Responsibility Policy \(BSCD27\)](#), which establishes the Company's commitments to responsible business conduct, including alignment with the United Nations Global Compact principles;
- [The Sustainability Policy \(BSCD38\)](#), which sets out the Company's environmental commitments and responsibilities in support of sustainable operations;
- [The Equality, Diversity and Inclusion Policy \(BSCD37\)](#), which provides detailed requirements in respect of equality, fairness, and inclusive workplace practices;
- [The Anti-Slavery and Human Trafficking Policy \(BSCD26 – Anti-Slavery\)](#) and [Child Labour Policy \(BSCD32\)](#), which support the Company's commitments to human rights and labour standards;
- [The Anti-Corruption and Anti-Bribery Policy \(BSCD15\)](#), which establishes detailed controls relating to bribery, corruption, gifts, hospitality, and financial integrity; and
- The Company's Information Security Policy framework, [Data Processing Policy \(BSCD22\)](#), and [Privacy Policy \(BSCD16\)](#), which define requirements for the protection, processing, and handling of Company and customer information.

These policies operate together to provide a comprehensive and integrated control environment, supporting compliance with legal, regulatory, ethical, and contractual obligations.

Where requirements overlap, these policies must be applied in a complementary manner, and in the event of any inconsistency, the higher ethical, legal, or compliance standard shall apply.

19 Governance and Review

This Code is owned by the Head of Operations and is reviewed at least annually, or more frequently where required, to ensure its continued suitability, adequacy, and effectiveness.

Reviews are conducted in alignment with the Company's [Compliance Policy](#) and governance framework and take into account:

- Developments in applicable legal and regulatory requirements;
- The Company's ongoing commitment to the United Nations Global Compact (UNGC) Ten Principles;
- Changes to the Company's operations, risk profile, or business relationships; and
- Evolving best practices in ethical conduct, sustainability, and responsible business operations, including alignment with the Company's [Corporate and Social Responsibility Policy](#) and [Sustainability Policy](#).

Any material updates to this Code are subject to appropriate approval and are communicated to relevant individuals and third parties.

20 Acknowledgement of the Code


All individuals within the scope of this Code are expected to familiarise themselves with its contents and to act in accordance with its requirements and the Company's wider policy framework.

For employees and workers, compliance with this Code forms part of the Company's standard terms of employment and engagement. Accordingly, acceptance of this Code, and all associated Company policies, shall be deemed to have been made on an implied basis, unless otherwise expressly agreed in writing.

For suppliers and third parties, adherence to the standards set out in this Code is required as part of doing business with the Company. In addition, the Company's [Supplier Code of Conduct Policy \(BSCD26\)](#) sets out more detailed requirements applicable to suppliers and third-party providers. Acceptance of the Supplier Code of Conduct Policy shall be deemed to have been made unless an alternative position is expressly agreed and documented contractually.

The Company may, where appropriate, request formal acknowledgement of this Code and related policies as part of its governance, compliance, or assurance activities.

21 Sign Off

For Bluesource	
Name	Nick Jagers
Position	Head of Operations
Signature	
Date	08/05/2026

22 Revision History

Revision Date	Reviser	Description of Revision
08/05/2026	Nick Jagers	Policy created based on Supplier Code of Conduct and relevant topic specific Company policies that form part of the wider ISMS and governance framework.