

BELLROCK GROUP

Supplier Code of Conduct

The standards we expect from the partners we work with
— how we do business, together.

ISSUED JUNE 2026

GOVERNANCE

Document Control

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Message from the CEO

At Bellrock, we believe that how we achieve success matters just as much as the success itself.

Our growth has been built on trust: the trust of our clients, the commitment of our people, the strength of our partnerships and our willingness to challenge convention in pursuit of better outcomes. As we continue to expand, innovate and welcome new businesses into the Group, protecting and strengthening that trust becomes even more critical.

We are proud to be The Trusted Challenger in Property. We are reshaping how property services are delivered by bringing together technology, data, insights, expertise and exceptional people. But innovation alone is not enough. Enduring success is grounded in integrity, accountability and doing the right thing, always, even when no one is watching.

Our values are not statements on a page; they are the standards we hold ourselves to every day. We are Client Obsessed. We Strive for Excellence. We Do the Right Thing. We Have Each Other's Backs. We Smash It. These principles shape every decision we take and every relationship we build.

The suppliers, subcontractors, consultants, agency providers and business partners we work with play a vital role in helping us deliver for our clients. We seek to build relationships with organisations that share our commitment to ethical business practices, safety, professionalism, sustainability and respect for others.

This Supplier Code of Conduct sets out the standards and behaviours we expect from all organisations and individuals who provide goods or services to Bellrock. It is intended to support responsible decision-making, promote compliance with applicable laws and regulations, and protect the reputation and trust that Bellrock and our partners have worked hard to earn.

We recognise that strong partnerships are built on openness, accountability and a commitment to continuous improvement. We expect our suppliers and business partners to raise concerns where something does not seem right and to foster a culture where integrity is valued and upheld.

By working together and holding ourselves to high standards, we can create better outcomes for our clients, support our communities, minimise our environmental impact and contribute to a more sustainable future.

Thank you for supporting Bellrock and for sharing our commitment to doing business the right way.

Together, we are optimising today and transforming tomorrow.

Carlo Alloni
Chief Executive Officer, Bellrock

Introduction

At Bellrock, we recognise that our suppliers are an extension of our business and play a critical role in helping us deliver for our clients.

This Supplier Code of Conduct sets out the standards and behaviours we expect from all organisations and individuals who provide goods or services to Bellrock, or who act on our behalf.

THIS CODE APPLIES TO

Suppliers

Subcontractors

Consultants

Agency providers

Joint venture partners

Other third parties

We expect our suppliers to comply with all applicable laws and regulations and to operate in a manner consistent with the principles set out in this Code.

Suppliers are expected to communicate the principles contained within this Code throughout their own organisations and supply chains.

WHERE STANDARDS DIFFER

Where local laws or regulations differ from the standards set out in this Code, suppliers should comply with **whichever standard is higher**.

Our Values and Expectations

Bellrock's values define who we are and how we work.

We expect our suppliers and business partners to support these values through their actions, decisions and behaviours. Our values are:

01 We're Client Obsessed

02 We Strive for Excellence

03 We Do the Right Thing

04 We Have Each Other's Backs

05 We Smash It

The following sections explain what these values mean in practice and the standards we expect from those who work with us.

VALUE 01

We're Client Obsessed

IN THIS SECTION

Delivering Quality and Service Excellence

Client Trust and Confidentiality

Delivering Quality and Service Excellence

✓ Bellrock expects suppliers to

- Deliver products and services safely, professionally and to agreed standards.
- Meet contractual commitments and performance requirements.
- Focus on quality, reliability and client outcomes.
- Continuously improve service delivery.
- Address issues openly and promptly.

– Bellrock expects suppliers not to

- Deliver sub-standard work.
- Conceal service failures or quality issues.
- Make commitments they cannot fulfil.
- Compromise quality for speed or convenience.

Client Trust and Confidentiality

✓ Bellrock expects suppliers to

- Protect client information and commercially sensitive data.
- Maintain confidentiality obligations.
- Use information only for authorised purposes.
- Implement appropriate information security controls.

– Bellrock expects suppliers not to

- Share confidential information without authorisation.
- Use client information for personal or commercial gain.
- Leave information unsecured.
- Disclose Bellrock or client information inappropriately.

VALUE 02

We Strive for Excellence

IN THIS SECTION

Professional Standards and Competence

Innovation and Continuous Improvement

Professional Standards and Competence

Bellrock expects suppliers to

- Maintain the knowledge, skills and qualifications required to perform their services.
- Ensure employees and subcontractors are competent and appropriately trained.
- Deliver work to recognised professional and industry standards.
- Maintain appropriate licences, certifications and accreditations.

Bellrock expects suppliers not to

- Undertake work without appropriate competence.
- Misrepresent qualifications or capabilities.
- Allow professional standards to fall below legal or contractual requirements.

Innovation and Continuous Improvement

Bellrock expects suppliers to

- Seek opportunities to improve performance, efficiency and quality.
- Embrace innovation where it creates value and reduces risk.
- Share ideas and best practice.
- Support continuous improvement initiatives.

Bellrock expects suppliers not to

- Resist change without good reason.
- Ignore opportunities to improve outcomes.
- Allow outdated processes to hinder performance.

VALUE 03

We Do the Right Thing

IN THIS SECTION

Integrity and Ethical Business Conduct

Anti-Bribery and Corruption

Gifts, Hospitality and Entertainment

Conflicts of Interest

Fair Competition and Business Conduct

Financial Integrity

Financial Crime, Tax Evasion and Money Laundering

Sanctions and Trade Compliance

Human Rights and Modern Slavery

Data Protection and Information Security

Integrity and Ethical Business Conduct

✓ Bellrock expects suppliers to

- Conduct business honestly, fairly and transparently.
- Comply with all applicable laws and regulations.
- Act with integrity in all business dealings.
- Avoid situations that could damage Bellrock's reputation.

— Bellrock expects suppliers not to

- Engage in dishonest or unethical conduct.
- Mislead clients, Bellrock or other stakeholders.
- Conceal information that should be disclosed.

Anti-Bribery and Corruption

✓ Bellrock expects suppliers to

- Maintain a zero-tolerance approach to bribery and corruption.
- Comply with the UK Bribery Act 2010.
- Maintain appropriate anti-bribery controls and procedures.
- Raise concerns relating to bribery and corruption.

— Bellrock expects suppliers not to

- Offer, request or accept bribes.
- Make facilitation payments.
- Use third parties to circumvent anti-bribery requirements.

| Gifts, Hospitality and Entertainment

Bellrock is committed to conducting business fairly, transparently and with integrity.

Gifts, hospitality and entertainment can play a legitimate role in building business relationships. However, they must never be used, or appear to be used, to influence business decisions, secure an improper advantage or create a conflict of interest.

Bellrock expects suppliers to exercise good judgement and maintain appropriate controls in relation to gifts, hospitality and entertainment.

Bellrock expects suppliers to

- Ensure gifts, hospitality and entertainment are reasonable, proportionate and infrequent.
- Comply with applicable anti-bribery and anti-corruption laws.
- Maintain appropriate policies, procedures and controls.
- Exercise particular caution during procurement, tendering and contract award processes.
- Declare any circumstances that could reasonably be perceived as creating a conflict of interest.

Bellrock expects suppliers not to

- Offer, provide or accept gifts, hospitality or entertainment intended to influence a business decision.
- Provide excessive or inappropriate gifts, hospitality or benefits.
- Offer gifts or hospitality during active procurement or tender processes where this may create actual or perceived influence.
- Conceal gifts, hospitality or entertainment from Bellrock.

| Conflicts of Interest

Bellrock expects suppliers to

- Identify and disclose actual, potential or perceived conflicts of interest.
- Maintain transparency in commercial dealings.
- Manage conflicts appropriately.

Bellrock expects suppliers not to

- Allow personal interests to influence business decisions.
- Conceal conflicts of interest.

Fair Competition and Business Conduct

✓ Bellrock expects suppliers to

- Compete fairly and lawfully.
- Comply with competition and anti-trust laws.
- Conduct business ethically.

– Bellrock expects suppliers not to

- Engage in price-fixing.
- Share commercially sensitive information unlawfully.
- Participate in anti-competitive arrangements.

Financial Integrity

✓ Bellrock expects suppliers to

- Maintain accurate books and records.
- Implement effective financial controls.
- Prevent fraud and financial crime.

– Bellrock expects suppliers not to

- Falsify records.
- Submit false invoices or claims.
- Conceal financial misconduct.

Financial Crime, Tax Evasion and Money Laundering

Bellrock expects suppliers to conduct business lawfully, ethically and transparently.

Suppliers must take appropriate steps to prevent fraud, money laundering, terrorist financing, tax evasion and other forms of financial crime. Effective controls help protect businesses, clients, communities and the integrity of the wider supply chain.

✓ Bellrock expects suppliers to

- Maintain appropriate financial controls and governance arrangements.
- Keep accurate books, records and supporting documentation.
- Conduct appropriate due diligence on relevant business partners and subcontractors.
- Identify and report suspicious transactions or financial activity.
- Cooperate with reasonable requests for information relating to financial crime compliance.

– Bellrock expects suppliers not to

- Facilitate tax evasion, money laundering or other financial crime.
- Conceal the source, ownership or purpose of funds or assets.
- Submit false records, invoices or documentation.
- Circumvent financial controls or due diligence processes.
- Ignore warning signs of potentially unlawful financial activity.

Sanctions and Trade Compliance

Bellrock expects suppliers to comply with all applicable sanctions, export controls and trade compliance laws.

Suppliers should maintain appropriate processes to identify and manage risks associated with restricted countries, organisations and individuals and ensure compliance with applicable legal and regulatory requirements.

✓ Bellrock expects suppliers to

- Comply with applicable sanctions, export control and trade compliance laws.
- Conduct appropriate screening and due diligence where relevant.
- Notify Bellrock of any sanctions-related issues that may affect the supplier's ability to perform services.
- Maintain appropriate records and controls.

– Bellrock expects suppliers not to

- Conduct business in breach of applicable sanctions or trade restrictions.
- Circumvent sanctions, export controls or regulatory requirements.
- Ignore concerns regarding restricted parties or prohibited activities.
- Continue activities where there are reasonable concerns regarding legal compliance.

Human Rights and Modern Slavery

✓ Bellrock expects suppliers to

- Respect internationally recognised human rights.
- Comply with the Modern Slavery Act 2015.
- Maintain fair working conditions.
- Take steps to prevent forced labour, child labour and exploitation.

– Bellrock expects suppliers not to

- Tolerate modern slavery.
- Engage in forced or compulsory labour.
- Knowingly support exploitative labour practices.

Data Protection and Information Security



Bellrock expects suppliers to

- Comply with UK GDPR and data protection laws.
- Protect personal information.
- Maintain appropriate information security controls.
- Report data breaches promptly.



Bellrock expects suppliers not to

- Misuse personal information.
- Share information without authorisation.
- Ignore information security risks.

VALUE 04

We Have Each Other's Backs

IN THIS SECTION

Health, Safety and Wellbeing

Equality, Diversity and Inclusion

Respect at Work

Health, Safety and Wellbeing

✓ Bellrock expects suppliers to

- Provide safe systems of work.
- Comply with health and safety legislation.
- Promote physical and mental wellbeing.
- Report incidents and hazards appropriately.

– Bellrock expects suppliers not to

- Take shortcuts that compromise safety.
- Ignore safety concerns.
- Put people at unnecessary risk.

Equality, Diversity and Inclusion

✓ Bellrock expects suppliers to

- Promote equality, diversity and inclusion.
- Treat people fairly and with respect.
- Provide equal opportunities.

– Bellrock expects suppliers not to

- Discriminate unlawfully.
- Tolerate harassment, bullying or victimisation.

Respect at Work

✓ Bellrock expects suppliers to

- Create respectful working environments.
- Promote dignity and professionalism.
- Foster positive working relationships.

– Bellrock expects suppliers not to

- Engage in bullying, harassment or intimidation.
- Tolerate unacceptable behaviour.

VALUE 05

We Smash It

IN THIS SECTION

Sustainability and Environmental Responsibility

Responsible Supply Chains and Community Impact

Long-Term Partnerships

Responsible Use of Technology and Artificial Intelligence

| Sustainability and Environmental Responsibility

✓ Bellrock expects suppliers to

- Minimise environmental impact.
- Comply with environmental legislation.
- Support sustainable business practices.
- Reduce waste and resource consumption.

– Bellrock expects suppliers not to

- Ignore environmental responsibilities.
- Misrepresent environmental performance.

| Responsible Supply Chains and Community Impact

✓ Bellrock expects suppliers to

- Support local communities where possible.
- Act responsibly and ethically.
- Contribute positively to society.

– Bellrock expects suppliers not to

- Undertake activities that could damage community trust.

| Long-Term Partnerships

✓ Bellrock expects suppliers to

- Build relationships based on trust, collaboration and transparency.
- Communicate openly and honestly.
- Support continuous improvement.

– Bellrock expects suppliers not to

- Undermine trust through poor conduct.
- Prioritise short-term gain over long-term partnership.

I Responsible Use of Technology and Artificial Intelligence

Technology, data and artificial intelligence are increasingly important in the delivery of products and services.

Bellrock expects suppliers to use technology responsibly, ethically and securely and to ensure appropriate safeguards are in place to protect confidential information, personal data and client trust.

✓ Bellrock expects suppliers to

- Use technology and artificial intelligence responsibly and ethically.
- Maintain appropriate information security and data protection controls.
- Ensure appropriate human oversight of significant decisions or outputs generated by technology or artificial intelligence.
- Comply with applicable legal, regulatory and contractual requirements.
- Take reasonable steps to identify and manage technology-related risks.

– Bellrock expects suppliers not to

- Input Bellrock confidential information into unauthorised systems or artificial intelligence tools.
- Use technology in a manner that compromises privacy, security or legal compliance.
- Rely solely on automated systems where human judgement or oversight is required.
- Use technology in a way that could create unacceptable ethical, legal or reputational risks.

Speaking Up

Bellrock encourages suppliers and their employees to raise concerns regarding unethical, unlawful or inappropriate conduct.

Concerns may relate to:

Bribery and corruption

Fraud

Modern slavery

Health and safety

Human rights

Data protection

Environmental concerns

Breaches of this Code

Bellrock's Speak Up arrangements are available to suppliers, subcontractors and their employees through Bellrock's independent reporting provider, Safecall.

Bellrock will not tolerate retaliation against anyone who raises a concern in good faith.

BELLROCK SPEAK UP

Web address www.bellrock.co.uk

Telephone +44 (0) 116 464 0800

Reporting link <https://bellrockgroup.sharepoint.com/sites/ethicsandcompliance/SitePages/Safecall-at-Bellrock.aspx>

Compliance with this Code

Bellrock expects suppliers to comply with this Supplier Code of Conduct.

01

Maintain policies and controls. Suppliers should maintain policies, procedures and controls that support the principles set out in this Code.

02

Verification and audit. Bellrock reserves the right to request evidence of compliance and may undertake audits, assessments or reviews where appropriate.

03

Consequences. Failure to comply with this Code may result in corrective action, suspension of work, termination of contracts or other appropriate action.

Together, we can build trusted partnerships that deliver excellent outcomes for our clients, support our communities and uphold the values that define Bellrock.

Optimising today, transforming tomorrow.

As the trusted challenger in property, we bring together technology, people and facilities management to deliver specialist, risk-focused workplace and property services across the UK. If you have questions about anything in this Code, please speak to your line manager or the People Team. This document is reviewed annually and may be updated to reflect changes in our business, our values and applicable law.

WEBSITE

www.bellrock.co.uk

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