



# Code of Conduct

January 2022



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# introduction from Thierry

**We are all working together to make home improvement accessible for everyone.**

Our Code of Conduct sets out the standards of behaviours we expect and our corporate values that help us maintain our strong reputation. We set high standards for everyone working with us to carry out our business fairly and with complete integrity.

It's about a shared responsibility to be honest, transparent and fair. This is non-negotiable in Kingfisher.

We want to create a business environment based on trust, where we all feel comfortable to speak up and raise any concerns.

That way, we safeguard the interests of the business, our customers, colleagues, stakeholders, shareholders and the communities we serve - not just today but for the long term.

Thanks for playing your part.



# our Code of Conduct





**Our Code of Conduct helps to promote a culture where transparency, honesty and fairness are the norm. It sets out our personal and shared responsibilities for creating and maintaining an ethical and compliant environment within Kingfisher.**

In an organisation as global and diverse as ours, our Code of Conduct cannot and does not seek to cover every eventuality. Instead, it defines the key behaviours we expect of every part of our business, and all those working with us, so that together we meet the highest ethical standards.



# who does this Code apply to?

**This Code and its related Group Policies (see Appendix I) apply to all Kingfisher Group Entities, colleagues and third parties.**

By **colleagues** we mean individuals working at all levels and grades for any Kingfisher Group Entity, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, and interns.

By **third party** we mean all suppliers, vendors, service providers, intermediaries, agents, business partners, external consultants, charities, advisors or entities contracted or proposed to be contracted or engaged by Kingfisher.

Managers must ensure their teams are aware of, and comply with, the Code. By **managers** we mean colleagues who supervise the work of other colleague(s).

We also apply our Code of Conduct whenever we control a joint venture. In other situations, we will make ongoing efforts so that the partner who controls the joint venture applies principles that are equivalent to our Code of Conduct.

Colleagues must comply with this Code and make sure that third parties receive, adhere and ensure that their employees and subcontractors comply with it whenever they deal with Kingfisher.

Responsibility for ensuring compliance with our Code rests with each Kingfisher Group Entity Chief Executive.

# your personal responsibility

**Every one of us has a personal responsibility for making sound judgements, so that we carry out the work we do to the highest ethical standards.**

## You can do that by:

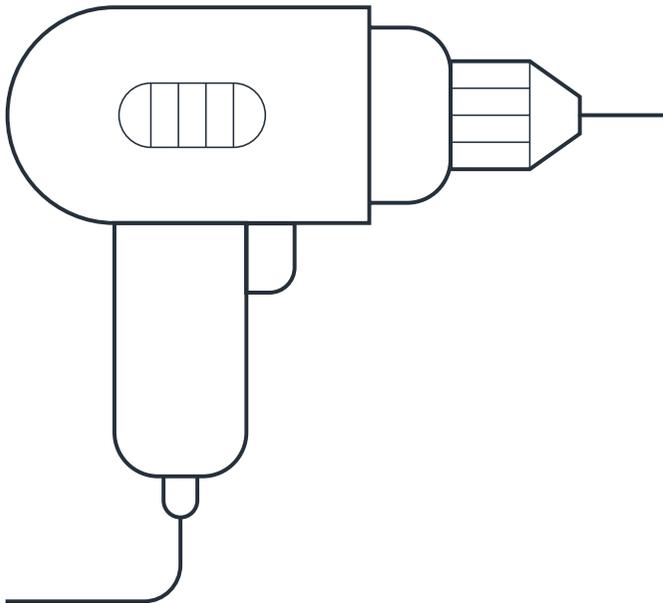
- Doing the right thing, even when nobody asks or oversees your tasks.
- Being vigilant and attentive to your surroundings.
- Thinking about the tasks you are doing, the risks involved and how to minimise them.
- Taking ownership and believing responsibility is more than just doing the tasks that are given to you.
- Demonstrating genuine care for the wellbeing of the company, your colleagues and customers.
- Engaging your team and acting as a role model. People are influenced by positive examples.
- If you are a Manager, you have a double responsibility. Consider your own tasks and those of your team.

- Reading, understanding and applying this Code in your day to day conduct. Always stimulate discussions around the Code and make sure you and your colleagues understand how Kingfisher expects you to behave

We also have a duty to treat others as we would expect to be treated ourselves.

## So, remember:

- Be transparent – always clear and straightforward in your words and actions.
- Be honest – truthful and sincere in the way you communicate.
- Be fair – considerate towards others and treating each other with dignity and respect, including customers, colleagues, suppliers and competitors.



# putting the Code into practice

## Wherever you work in Kingfisher, or however you work alongside us, the way we conduct our business is underpinned by the following commitments:

- We put safety first; everyone has the right to return home every day unharmed.
- We comply with the law. Always. In all countries where we operate. This is a given.
- We don't tolerate inappropriate behaviour and, regardless of hierarchy, we challenge our colleagues and third parties whenever that happens.
- We think customer first. Everything we do must benefit our customer. We treat them with the same high degree of care, respect and fairness we treat each other.
- We operate our business ethically and with respect for human rights and the environment.
- In our dealings with third parties we act in the best interests of Kingfisher, but always with transparency, honesty and fairness.
- All our products are safe and fit for purpose. Quality counts.
- If we see something wrong, we must take action without fear of reprisal. This is how we exercise our commitment to maintain a safe and ethical workplace.
- We don't tolerate retaliation against colleagues or third parties who have reported in good faith a genuine suspected breach or violation of our Code or Group Policy.
- We show respect to everyone we work with, regardless of their age, gender, ethnic background, race, nationality, faith or belief, sexual orientation, gender reassignment or disability. We are all different from each other and this is our source of richness.

Above all, we always try to **do the right thing**, no matter how difficult that may be.

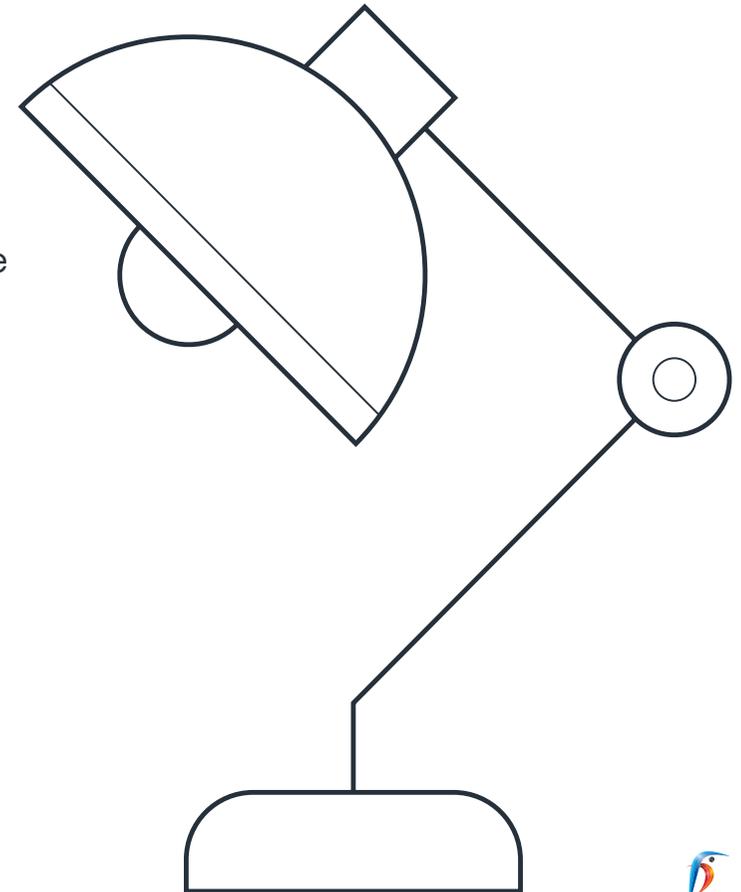
# what do we mean by 'doing the right thing'

**We may all have a slightly different perspective on what the right thing to do is. What may seem perfectly reasonable to one person, may not to another. At the same time, most of us are unlikely to know in detail what the law requires in relation to the way businesses operate.**

If you find yourself in a situation where you are being asked to do something you think may be wrong or you suspect a Colleague, customer or supplier may be doing something that is illegal or unethical:

## **Ask yourself:**

- Would Kingfisher be comfortable if it appeared in a newspaper?
- Does it feel morally or ethically wrong to me?
- Would most people feel the same way about it as I do?
- Does it feel inconsistent with our Code of Conduct?



# what should I do if I have concerns

**If, after asking yourself these questions, you are still uncomfortable about the situation, it's quite possible that our Code of Conduct is at risk of being breached.**

If that's the case, then you have a **duty to report** – it's in everyone's interest that you do.

In the first instance, seek advice from your Manager or your Legal and Compliance team. If, after seeking guidance, you're satisfied and confident that your decision to report your concern is correct, then go ahead and report it.

## **There are a number of ways to do so:**

- If you are a Colleague, you can report a concern by speaking to your Manager, to your HR business partner, or to your Legal and Compliance team.
- Anybody can seek guidance or report a concern to the Kingfisher Head of Compliance, via [codeofconduct@kingfisher.com](mailto:codeofconduct@kingfisher.com)
- You can use Kingfisher's independent speak up line, via telephone or our web-based facility (<https://kingfisher.ethicspoint.com/>) where colleagues and third parties can raise concerns.

Your concern will always be treated as confidential and, if you prefer, you can choose to remain anonymous if you contact us via telephone or internet.

Details of this process are communicated at local level and are set out on visible posters in your workplace.

# what happens next?

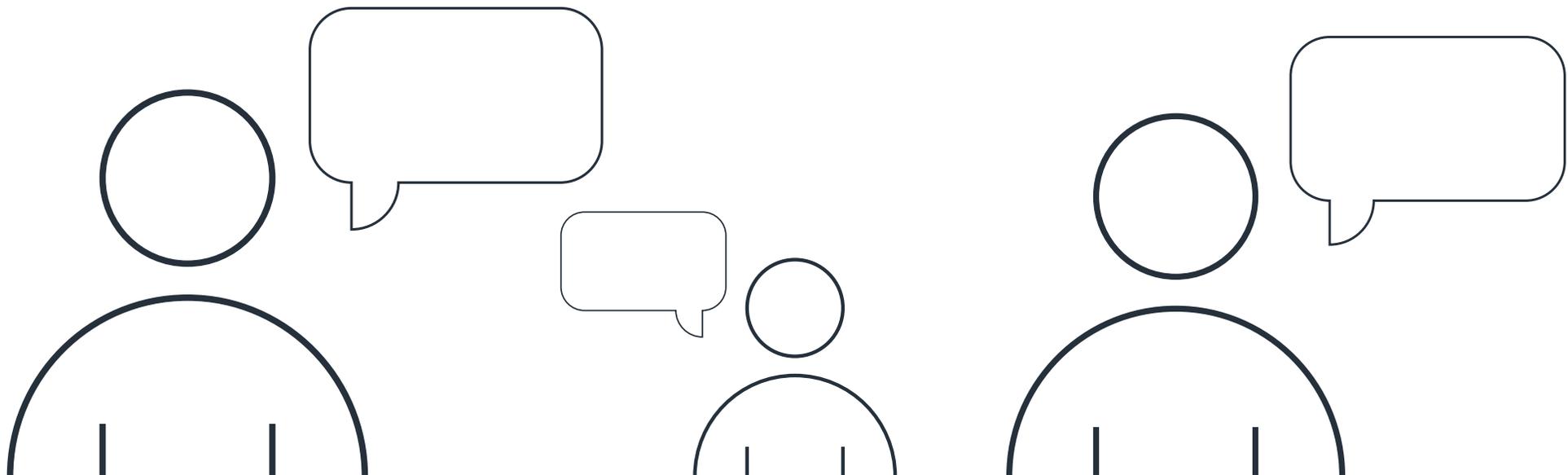
**Our Code and our Whistleblowing Policy are designed to foster an environment where people feel confident they can 'speak up' and where they know that it is the right thing to do. Without that, suspected illegal or unethical conduct may go unchecked.**

For that reason, any suspected breach reported in good faith will be investigated in the most appropriate way, always respecting confidentiality and always ensuring that any form of retaliation or harassment for raising a concern is not tolerated.

Kingfisher takes compliance with this Code and its Group policies very seriously. Proven violations may lead to severe disciplinary action taken against the offending colleagues or third party.

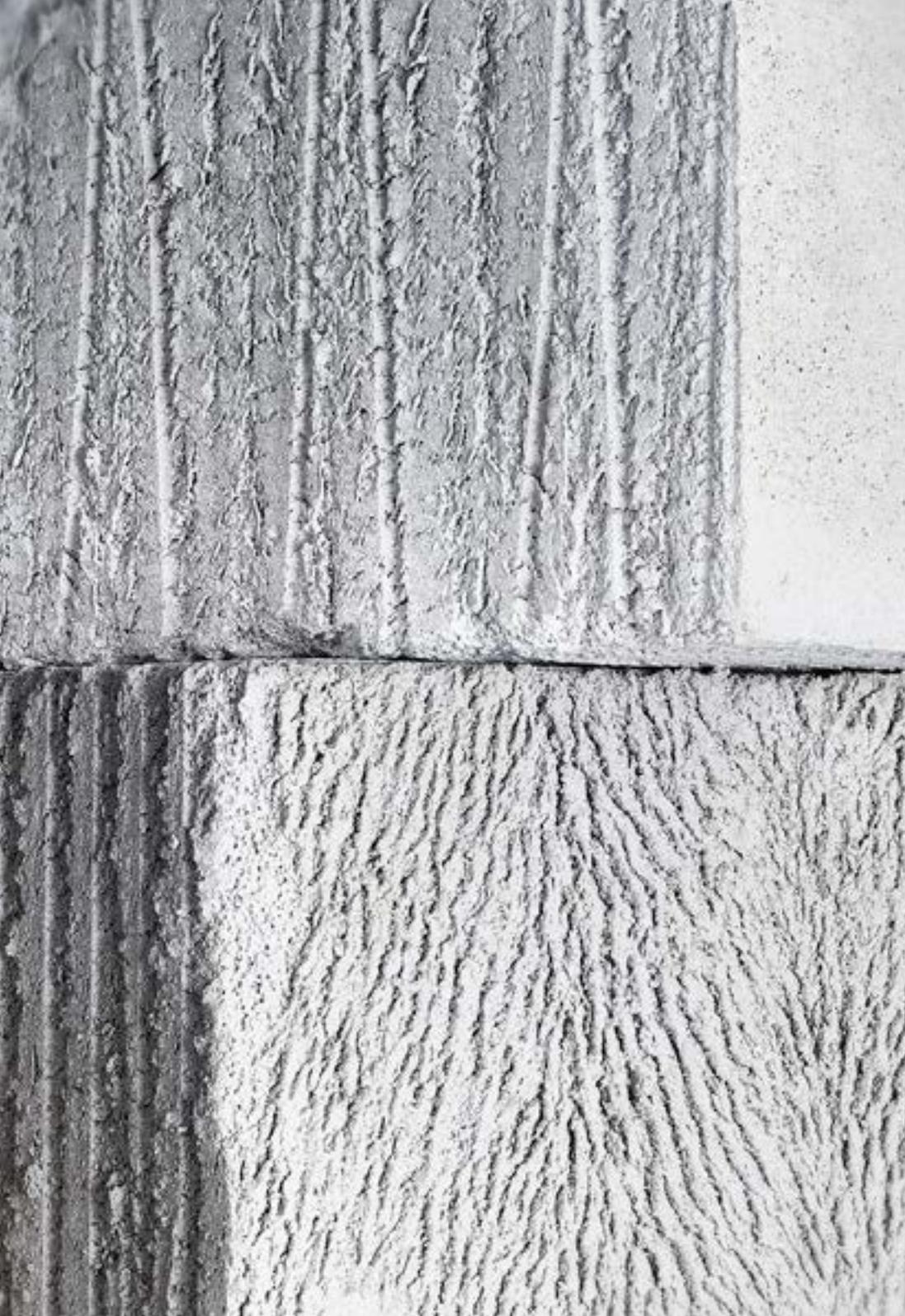
### **That could involve:**

- A formal reprimand;
- Suspension; and/or
- Termination of employment and/or third-party contracts.



# sustainability and ethical behaviour





**We know people need a good environment, both to live and work in. That's why we're creating a more ethical, sustainable, ecologically friendly business.**

We will always treat one another, our customers, suppliers and business partners, honestly, fairly, with dignity and respect for human rights.

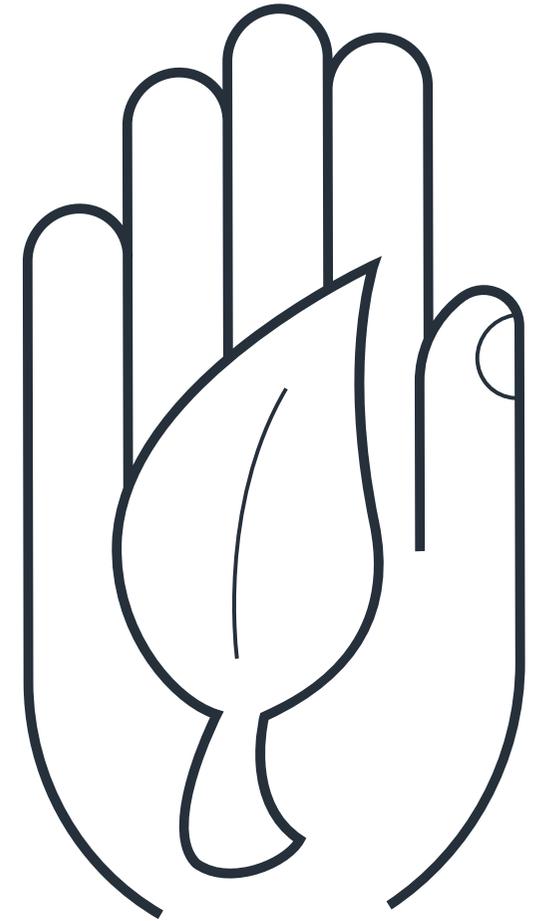
# how we protect and enhance the environment

**We don't just want to be proud of what we do and how we do it. We want to be proud of the impact we have too. We want to be a truly sustainable company, offering our customers solutions for sustainable and good homes, and operating with a commitment to always do good business.**

We've developed a sustainable growth plan that's changing the way we work. Our teams are creating energy and water saving products for our customers, helping them reconnect with nature, build toxin-free environments, and live more, for less.

We all have a part to play in protecting the environment and we expect suppliers to work with us to help us meet our sustainability goals and policies.

Make sure you are familiar with our [Sustainability Policies](#) and seek guidance from your Sustainability team if anything isn't clear.



# how we work with suppliers

**We care about where our products and raw materials come from and expect them to be legally and ethically sourced. Suppliers must make sure that factories and worksites meet our standards in relation to human rights, labour practices and the environment, in line with our Supply Chain Workplace Standards.**

We carry out audits on high-risk suppliers and work with them to continually improve standards and to make sure that the human rights of workers in our supply chain are protected.

**We make procurement decisions based on objective factors such as quality, service, price, sustainability, integrity and delivery.**

# how we treat each other

**We respect human rights, the fundamental rights and freedoms we are all entitled to regardless of factors such as nationality, race or gender. Our Human Rights Policy has all the details.**

## **Do the right thing:**

- Don't use discriminatory, insulting or offensive language in the workplace. We value diversity and expect that all our colleagues and third parties also do.
- Don't behave in a way that offends, intimidates and is hostile, degrading or humiliating to others.
- Make sure our recruitment processes are not used to discriminate candidates.
- Make sure our suppliers are selected based on objective factors such as quality, service, price, sustainability and delivery.

We protect the **health and safety** of employees, customers, contractors and other visitors to our sites.

We value the richness of **diversity**. We are committed to promoting a culture of equality and diversity, recognising that people from different backgrounds and experiences bring valuable contributions to our company.

We do not tolerate **discrimination** on grounds such as age, gender, ethnic background, race, nationality, faith or belief, sexual orientation, gender reassignment or disability.

We provide **equal opportunities** for all colleagues. We recruit, develop and promote people for their aptitude, skills, experience and ability.

We don't tolerate **abusive behaviour** in any form. This includes violence, harassment, discrimination, intimidation and abuse of position. Any allegation or complaint of abusive behaviour will be fully, and properly investigated and appropriate action taken.

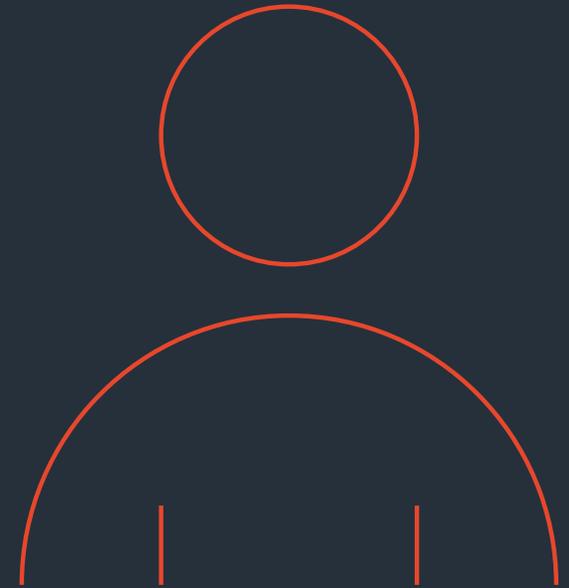
We expect all those we work with to adopt the same high standards, to respect human rights and take steps to protect their employees against discrimination. Any third-party employees working with Kingfisher must be fully aware of what constitutes acceptable behaviour, in line with our standards and in compliance with the law.

# modern slavery

**We publish annually a Modern Slavery Act Transparency Statement in accordance with the UK's Modern Slavery Act 2015, which requires businesses to disclose publicly the steps they are taking to tackle slavery, servitude, forced labour and human trafficking (together known as modern slavery). It sets out the steps we have taken to prevent modern slavery in our own business and supply chains.**

## **Do the right thing:**

- Don't ignore signs of violations to human rights, labour practices and the environment when you visit a supplier. It is our shared responsibility to ensure that we and our suppliers are operating in a sustainable and ethical environment.



**At Kingfisher we do not tolerate any form of modern slavery within our business or supply chain and will investigate any alleged breaches.**

# anti-bribery and corruption





**Bribery and corruption are criminal offences. We do not and will not offer, accept or pay bribes or improper inducements to anyone for any purpose**

Bribery is a form of corruption involving the giving or receiving by any person of anything of value (usually money, a gift, loan, reward, favour or other consideration), either directly or indirectly, as an inducement to gain an undue advantage or influence contrary to the principles of openness and integrity.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. That includes assessing risks, and implementing and enforcing effective systems to counter fraud, bribery and corrupt business practices.

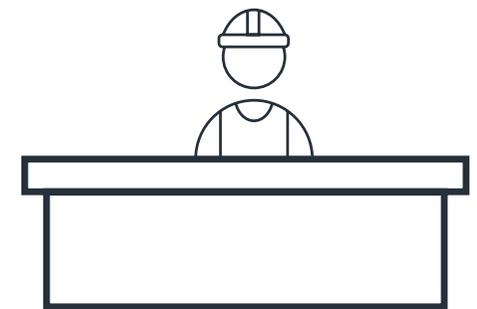
We uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate in respect of our conduct both at home and abroad. This includes but is not limited to the UK Bribery Act 2010, the French Law 2016-1691 (also known as Loi Sapin II) and the US Foreign Corrupt Practices Act.

## Do the right thing:

- Make sure you never engage in, or permit, corrupt activity, which may include the acceptance of gifts or hospitality when the intent of the offer or is to influence a business decision and/or as an inducement for an action which is illegal, unethical or a breach of trust.
- Don't tolerate the use of political influence to obtain undue advantage, money or favours to yourself or to Kingfisher.
- Make sure that all charitable actions, donations and sponsorships are only offered for legitimate business purposes, in line with our [Group Corporate Affairs Policy](#), our [Community Policy](#), and our [Anti-Bribery and Corruption Policy](#).
- Stay up to date with the appropriate training so that you know the corruption risks and the consequences of bribery and corruption in our business. Make sure you read this Code of Conduct and familiarise yourself with our [Anti-Bribery and Corruption Policy](#).
- Seek guidance from your Legal and Compliance team if necessary.

## What our policy states:

- All contacts with government officials in any country are conducted in compliance with applicable anti-bribery and anti-corruption laws. This means that we, and our third parties, do not give any gift or advantage (including facilitation payment) to a public official in any capacity. Facilitation payment means small bribes, also called a 'facilitating', 'speed' or 'grease' payment, made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement
- We do not make donations to political parties or politicians.
- Lobbying activities, the practice of individuals and organisations trying to influence the opinions and decisions of officials in positions of power, can only be carried out by colleagues and third parties if conducted in compliance with all applicable legal requirements and by people formally appointed by Kingfisher according to our [Group Corporate Affairs Policy](#) and our [Anti-Bribery and Corruption Policy](#).
- We only work with registered or well-known charities who operate to the legal and regulatory requirements appropriate to their country of operation.
- We require our third parties to take a similar approach and to have a programme and policy in place to prevent and detect fraud, bribery and corrupt business practices. If we have serious concerns about a third party's conduct (whether it relates to our business or not), we will review our relationship with them.
- Accounting and financing control procedures are implemented in each Kingfisher Group Entity in order to prevent and detect any scenario that might give rise to a bribery and/or corruption risk.



**gifts and hospitality**





**Giving or receiving gifts and hospitality can be good for business and building relationships. But it can also cause a conflict of interest between personal interest and professional duty. In certain circumstances it may be against the law.**

### Do the right thing:

- Whenever a supplier offers you a gift or hospitality, such as a bottle of wine, a ticket for a football match, or invites you for lunch/dinner, a cocktail or an entertainment event, check the thresholds and registration and approval process detailed in our [Gifts and Hospitality Policy](#).
- If you receive a gift or hospitality with the clear intent of influencing your behaviour, politely decline the gift or hospitality and explain that our [Gifts and Hospitality Policy](#) does not allow you to accept it.
- Before inviting a supplier, customer or business partner for lunch, dinner or drinks, check our [Gifts and Hospitality Policy](#) and follow the proper registration and approval process.
- Before offering any gifts or hospitality to Government Officials, regardless of value, seek approval from your Legal and Compliance team.

### In principle, there is usually nothing wrong with receiving or giving gifts of appreciation of a low value or accepting or giving reasonable entertainment to further a business relationship.

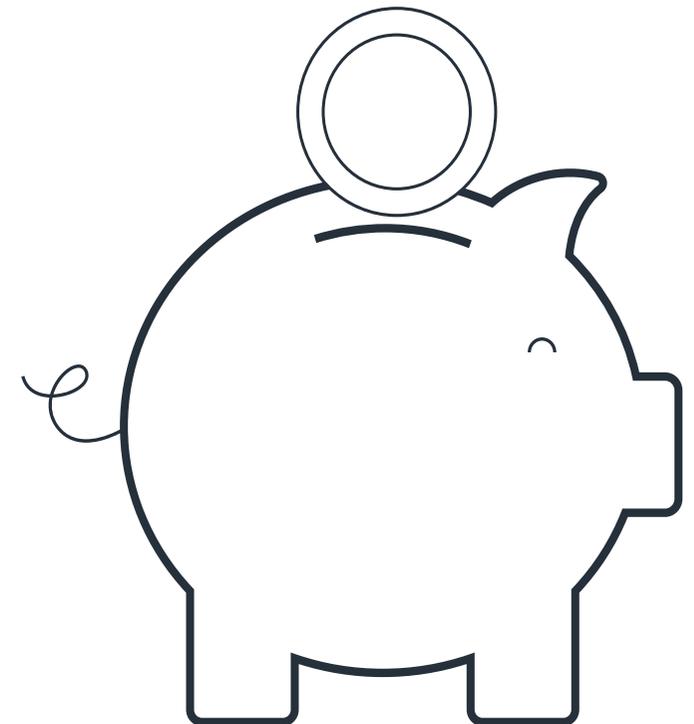
However, accepting or offering any gift or entertainment, regardless of value, that either makes the recipient feel obligated or could be construed to make the recipient feel obligated to start or continue a business relationship, is unacceptable and is considered a breach of our Code.

#### Ask yourself:

- Would the gift or entertainment be likely to or appear to influence my objectivity or the objectivity of the person to/from whom I am giving/receiving the gift or the entertainment?
- Would my impartiality or the impartiality of the person to/from whom I am giving/receiving the gift or entertainment be compromised in anyway or appear to others to be compromised?

If the answer to either of the above questions is “yes” or “perhaps” or could be perceived by third parties to be “yes” or “perhaps”, then you are likely to be breaching our Code. If you are not certain, then you should seek guidance from your Manager or from your Legal and Compliance team.

Determining what is and is not acceptable requires all colleagues and Third Parties to follow our [Gifts and Hospitality Policy](#).



**conflicts of interest**





**A conflict of interest may arise when you find yourself in a situation where two or more competing interests impair your ability to make objective, unbiased or arm's length decisions.**

## Business dealings with relatives (including recruitment), outside employment or activities, investments and private arrangements with third parties may be sources of conflicts of interest.

As a rule, potential conflicts of interest should be avoided or, if unavoidable, carefully managed. Always be transparent with your Manager and disclose potential conflicts of interest. Our [Conflict of Interest Policy](#) defines how you should disclose potential conflicts of interest

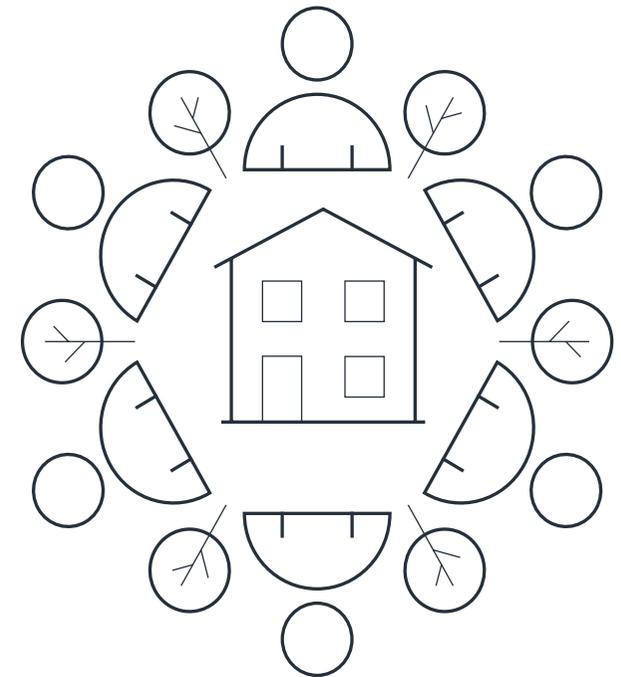
We expect all colleagues to be open and honest when the potential for a conflict of interest arises.

### Ask yourself:

- Would other colleagues or an outsider think the conflict might affect how I do my job?
- Do I or my connected person stand to gain anything by virtue of my relationship with the third-party doing business with Kingfisher, or vice versa?
- Could it affect any decision which I might make at Kingfisher?
- Do I feel under any obligation due to the relationship I have with the third-party doing business with Kingfisher?
- Would I be embarrassed if anyone inside Kingfisher knew about the situation?
- How might it look to someone outside Kingfisher such as another Kingfisher customer or supplier? Would they question whether they have been treated fairly?

If the answer to any of the above questions is “yes” or “perhaps” or could be perceived by third parties to be “yes” or “perhaps”, then you are involved in a conflict of interest which must be formally declared.

We require third parties to have no less strict an approach in their internal control procedures on conflicts of interest than we have set out here.



## Do the right thing:

Identifying conflicts of interest is not an easy task. Here are some examples that might help:

**Q** My brother is a representative for a proposed supplier. Should I report this relationship?

**A** Yes. Most likely this relationship will not create an issue and no changes will be necessary, but to avoid a conflict of interest or an appearance of a conflict of interest, you should declare the relationship in accordance with our [Conflict of Interest Policy](#).

**Q** I am interviewing for a new position in our team and my cousin has applied for the role. Should I report this?

**A** Yes. Most likely this relationship will not create an issue and no changes will be necessary, but to avoid a conflict of interest or an appearance of a conflict of interest, you should declare the relationship in accordance with our [Conflict of Interest Policy](#).

**Q** I am setting up a consulting firm to provide part-time services at the weekend, and one of my potential clients is a Kingfisher customer. Should I report this?

**A** Yes. Your employment contract with Kingfisher may prevent you from doing this. You should declare the situation in accordance with our [Conflict of Interest Policy](#) to determine if any action is necessary.

Seek guidance from your Legal and Compliance team if necessary.

how we compete





**Competition laws exist to promote and maintain market competition by regulating anti-competitive conduct by companies. We are committed to lawful, straightforward and ethical competition.**

## Competition laws apply in all countries where Kingfisher does business. A breach of these laws could result in significant penalties being imposed on Kingfisher and the individuals involved.

Breach of competition laws can lead to: serious civil and criminal penalties (including personal fines and prison sentences), the risk of being sued for damages by customers or others harmed by the unlawful conduct; and adverse publicity and reputational damage.

It could also lead to disciplinary action for colleagues and termination of contracts with third parties.

We are all responsible for ensuring that our business practices fully comply with the competition laws wherever we do business. That means not allowing any communication or activity which might amount to, or lead to, a breach of competition law.

### Do the right thing:

- Only share commercially sensitive information with a third party on a “need to know” basis.
- Don’t discuss, disclose or agree (even informally) on pricing, strategy, volumes, discounts, promotions or other sensitive information with competitors.
- Never allow or suggest disclosure of confidential information to or from competitors. One-way disclosures of competitively sensitive information can be treated by the authorities as anti-competitive agreements. In such cases, you must immediately end the conversation, make it clear why and report the discussion to the Kingfisher Legal and Compliance team.
- Don’t obtain confidential information from competitors, including indirectly whether from a third party or other market participant.

Make sure you are familiar with our [Fair Competition Policy](#). Please seek guidance from your Legal and Compliance team if anything isn’t clear.



# prevention of facilitation of tax evasion





**It's a criminal offence to evade tax or to facilitate others in their evasion of tax. We take a zero-tolerance approach to tax evasion and the facilitation of tax evasion.**

**Tax evasion involves deliberately and dishonestly not paying tax which is correctly payable. It could, for example, involve hiding sources of income or assets from tax authorities or creating false records to conceal the true nature of transactions. There is no minimum value threshold to tax evasion.**

**Facilitation of tax evasion occurs when a person:**

- Is knowingly involved in, or takes steps with a view to, the fraudulent evasion of tax; or
- Assists or encourages another person to commit tax evasion.

Kingfisher can face criminal sanctions if we fail to prevent colleagues and third parties from facilitating tax evasion. Colleagues and third parties must not facilitate tax evasion in the course of their duties for Kingfisher, whether in the UK or abroad, and whether by customers, suppliers, contractors or others.

**Ask yourself:**

- Do you know or suspect that tax evasion or the facilitation of tax evasion is taking place?
- Have you been asked to do anything that you suspect would facilitate tax evasion?
- Do you see opportunities for facilitation of tax evasion that we need to close/address?

If the answer to any of the above is “yes” or “perhaps”, then it is likely to be breaching our Code and you should report your concern. If you are not certain, then you should seek guidance from your Manager or from your Legal and Compliance team.

Make sure you are familiar with our [Tax Evasion Policy](#) and seek guidance from your Legal and Compliance team if anything isn't clear.

**Do the right thing:**

- Look out for suppliers asking to be paid through a tax haven country.
- Watch out if a company contracted by Kingfisher engages informal workers to avoid the payment of taxes.

# safeguarding confidential information



**Various laws protect confidential information from use by others as well as restricting the handling of such information.**



**Confidential information is critical to business success in a competitive marketplace. Improper or unauthorised use or handling of confidential information is damaging to the business and may impact on the operational or financial performance of Kingfisher or its reputation.**

Colleagues and third parties may have access to information that is private or confidential to Kingfisher, its personnel, customers or other suppliers. You must ensure that such information is only made available to those who need to know it to carry out their legitimate work for Kingfisher and that it is never disclosed to anyone else.

**Confidential information includes, but is not limited to:**

- Customer information
- Marketing or sales forecasts and strategies
- Business ideas, processes, plans and proposals
- Business strategies
- Supplier data
- Trade secrets and know-how
- Colleagues' personal records including employment, medical, education and training information
- Information about Kingfisher that is not publicly available

Where confidential information includes personal data, colleagues and third parties must also comply with the 'personal data' section below.

**Do the right thing:**

**Colleagues**

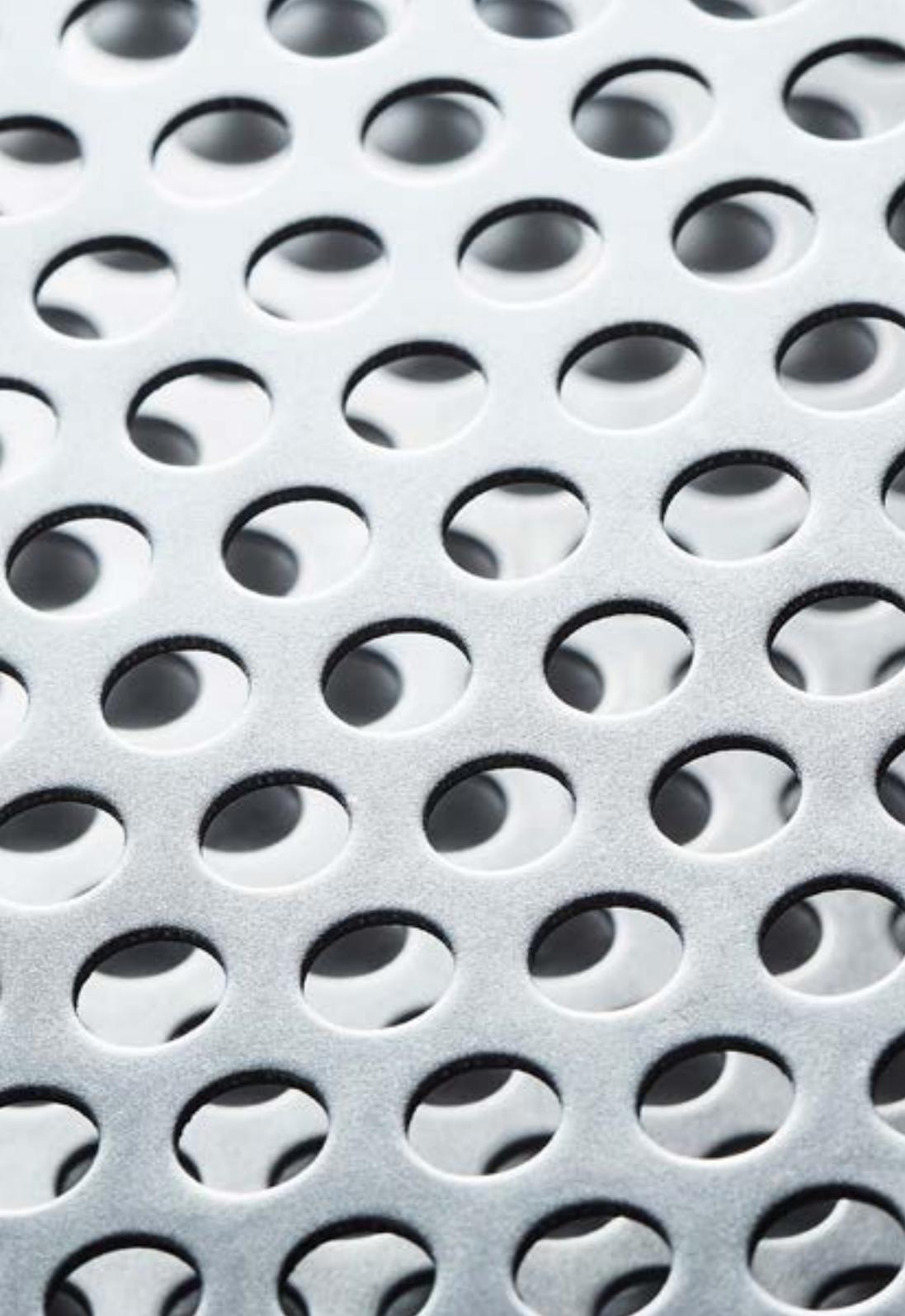
- If you have any doubt as to whether a person is entitled to confidential information, first check with your Manager.
- Take particular care when providing the confidential information to third parties acting on our behalf.
- Any information supplied should only be used to further legitimate business interests and must never be supplied with the intention of it being passed to third parties or competitors.

**Third parties**

- If you believe you have been given access to Kingfisher's confidential information in error, you should notify us immediately and refrain from distributing such information.
- You must not share with anyone at Kingfisher information related to any other person, company or other organisation if you are under a contractual or legal obligation not to share that information.

personal data



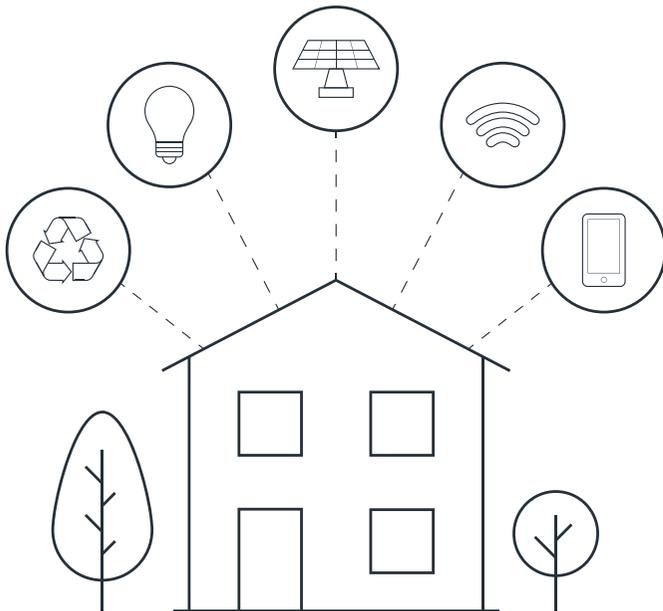


**Information which allows the identification of individuals, including customers, suppliers, employees and others is considered to be personal data.**

**Kingfisher takes the protection of personal data very seriously. We have, and require relevant third parties to have, robust processes and mechanisms in place to access, collect, store, manage and transfer personal data responsibly.**

Many of our business and commercial activities require us to process personal data. We have a responsibility to protect personal information we collect from colleagues, third parties and customers and to treat it fairly in accordance with the law.

We expect colleagues and third parties to comply with all data protection laws that apply to personal data, as well as with our Data Protection Policy and Information Security Policy.



**Do the right thing:**

When handling personal data:

- be transparent about what you are using it for – only use it for the purposes for which it was collected, and other purposes permitted by law.
- keep it secure.
- make sure it is adequate, accurate and relevant for the purpose for which it was collected.
- treat it in accordance with the laws related to data protection and privacy.

Make sure you are familiar with our Policies. Please seek guidance from our Data Protection Officer ([dpo@kingfisher.com](mailto:dpo@kingfisher.com)) or your Legal and Compliance team if anything isn't clear.

**health & safety**



**We aim to ensure the safety of our customers and colleagues is considered, all the way from initial product concept to the shop floor. A virtuous circle, from factory to store.**



**The safety and well-being of our colleagues and customers is all-important. We want to create a safe shopping environment for our customers and ensure that our colleagues can go about their work without being subjected to any unnecessary risk.**

While we can never totally guarantee a completely risk-free environment, we can ensure that safety is a part of our decision making. That way we can have a positive impact on the environment in which we operate and can be sure that all of our customers and colleagues return home safely after visiting our stores.

The Minimum Health and Safety Standards provide a benchmark that all Kingfisher Group Entities are expected to achieve or their local legislation, whichever is the highest.

**Safe Product**

We set minimum standards for safety and quality in the raw materials we will use to make our products, and in our packaging to ensure that we do not use harmful substances. We will use the highest standards of legislation and best practices as the universal benchmark for all.

**Safe Transportation**

Making the right decisions on how we transport our products has a significant impact on the welfare of our colleagues, for example on how much we have to manual handle products.

We commit to only using high quality, sustainable solutions to transport our products from all of our suppliers, using the safest methods available to us.

**Safe Stores**

The health and safety of our colleagues are always part of the decision making when we consider how we display our products in stores, creating merchandising standards that don't expose our colleagues and customers to potential harm.

**Safe People**

We train our colleagues to the highest safety standards and continually assess their training needs as our business moves forward.

We engage and empower our staff to work with us, together creating a safe culture in our stores.

# annual disclosures

**It's important to track how we are doing against our Code of Conduct. Not only does it give reassurance that we are meeting the high ethical standards we set ourselves, it also allows us to see where we can improve for the benefit of colleagues, customers and all those we do business with.**

## **We therefore require:**

- Each Kingfisher Group Entity Chief Executive to report annually to Kingfisher that there are no breaches of the Code that they have not already disclosed.
- All senior managers in Kingfisher to self-certify annually that they know of no breaches of the Code that they have not already disclosed, that they have read and understood the Code (and Group Policies), and that all potential conflicts of interest have been declared in writing.
- Third parties to report annually to Kingfisher (where requested) that there are no breaches of the Code that they have not already disclosed. We may ask third parties to review their control procedures to help prevent and detect conflicts of interest, bribery and corrupt business practices. If we have serious concerns about a third party's control procedures (whether they relate to our business or not), we may terminate our relationship with them.

# further information on our Code of Conduct

**This Code of Conduct is based on risk assessment carried out in line with legal requirements. The Code will be regularly reviewed to ensure it keeps pace with our constantly evolving and growing business.**

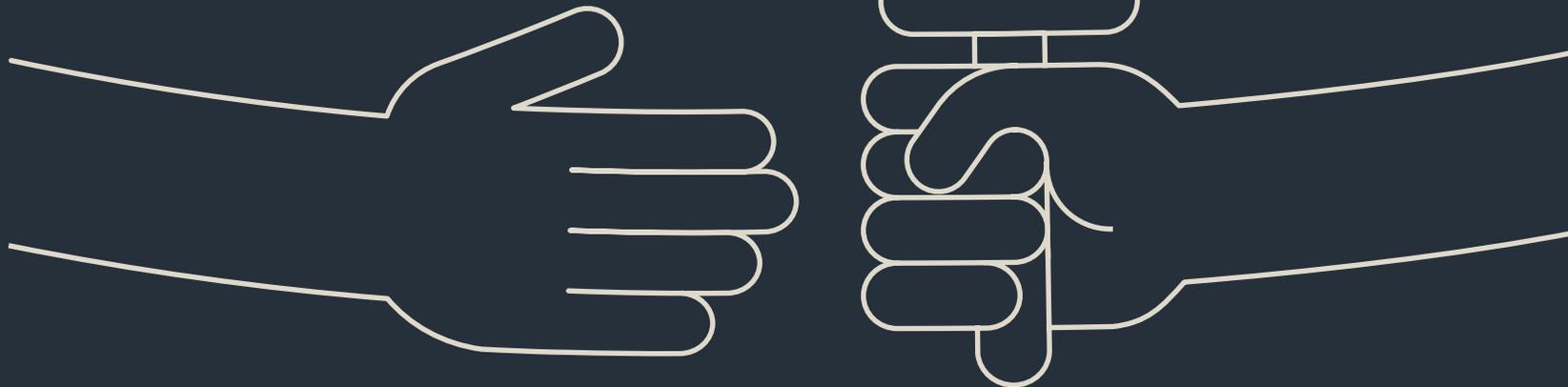
Kingfisher operates in countries where there are significant differences in cultures, laws and political environments. There may be instances when our Code and legal requirements conflict with local law or customs.

To the extent local law requires a higher standard than our Code, local law should always apply. Where local laws or customs set a lower standard, our Code should be followed as it sets the minimum requirements for all colleagues and third parties.

Kingfisher Group Entity can approve and maintain a local addendum to the Code of Conduct whenever this is necessary to comply with local requirements.

If you have any questions in relation to the Code or its application, please feel free to contact us through [codeofconduct@kingfisher.com](mailto:codeofconduct@kingfisher.com)

All emails to this account will be addressed by the Kingfisher Head of Compliance.



# Group Policies

**The following Group Policies are an integral part of the Kingfisher Code of Conduct:**

- Acceptable Use Security Policy
- Anti-Bribery and Corruption Policy
- Anti-Bullying and Harassment Policy
- Community Policy
- Corporate Affairs Policy
- Data Protection Policy
- Disclosure Policy
- Diversity and Inclusion Policy
- Equal Opportunities Policy
- Fair Competition Policy
- Gifts & Hospitality Policy
- Group Intellectual Property Policy
- Group Share Dealing Policy
- Health & Safety Policy
- Human Rights Policy
- Information Security Policy
- Record Keeping and Document Retention Policy
- Sanctions Policy
- Sustainability Policies
- Tax Evasion Policy
- Whistleblowing Policy

# agreement

**I have received a copy of this Code of Conduct and agree to comply with it.**

Signed:

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Name:

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Date:

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