

**BITMORE LIMITED**  
**Code of Business Conduct**  
**Version: 01/01/2025**

Our mission is to empower entrepreneurs and communities to work in harmony with nature and empower people. We do that by empowering our staff, partners, and communities by promoting fair entrepreneurship and collaboration. BITMORE LIMITED is committed to looking after the planet and are championing the use of sustainable and eco-friendly materials across our range of products.

We care about what we produce and how we produce it, we focus on sustainable design to ensure a positive impact for our customers, environment, and planet

We acknowledge our support of the United Nations Global Compact's ten principles. Under that program, we have pledged to respect those core principles relating to human rights, working conditions, environmental protection, and the fight against corruption. They are the foundation of our policies on environmental, social, and corporate governance, and they guide our continuous development in this area.

**Hoj Parmar**, BITMORE LIMITED Co-Founder

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BITMORE LIMITED creates and provides travel-tech products made from recycled, upcycled & plant-based materials to the world's finest airlines. Our ambition is to ensure we continually care about what we produce and how we produce it, and to focus on sustainable design to ensure a positive impact for our customers, environment and planet.

BITMORE LIMITED is committed to developing and distributing high-quality products. Our way of doing business entails being responsible, with a focus on the global impact on the environment and people. BITMORE LIMITED is paving the way regarding sustainability within the travel tech industry by using 80-100% recycled and plant-based plastics, eco-friendly inks, using less paper and card, and only using recycled paper and card, ensuring product packaging is simple, informative and can be easily recycled.

The roots of the BITMORE LIMITED Code of Business Conduct are in the implementation of values and principles through all our practices. We expect the same of all those who encounter our company, its products or value chains.



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**Our Code of Business Conduct** describes the values, actions and behaviours expected of all those who are employed by, represent or engage with BITMORE LIMITED.

The contents of this policy should be respected in letter and in spirit. It is not exhaustive, but it forms an essential foundation to be combined with everyone's sense of own responsibility. If in doubt, a precautionary principle of 'do no harm' to those impacted must be employed.

BITMORE LIMITED recognises the proliferation of Codes of Conduct standards and initiatives. We therefore support the convergence of these Codes of Conduct, standards and initiatives in an effort to consolidate the positive impact of collective efforts.

Requirements in this Code apply to the whole supply chain, including sub-suppliers, subcontractors, and farms. Standards equally apply to permanent, temporary, and agency workers, as well as piece-rate, salaried, hourly paid, legal young workers (minors), part time, night, and migrant workers.

BITMORE LIMITED pledges to help our suppliers improve labour, health and safety and environmental conditions in the workplace, and to help our suppliers understand how to improve their sustainability practices. We recognize that this effort requires listening to our suppliers and their employees' needs and requires a collaborative approach using capacity building tools such as root-cause analysis, training, and management-system development to drive meaningful change.

BITMORE LIMITED always seeks to exercise the best possible practices for the respectful and ethical treatment of workers and promote sustainable conditions in which workers earn fair wages in safe and healthy workplaces.

Our Code of Business Conduct is consistent with internationally agreed conventions on human rights, labour rights and environmental protection, including the Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration of Fundamental Principles and Rights at Work, the ILO conventions, the United Nations (UN) guiding principles for business and the UN conventions on the environment and human health.



## OUR VALUES

**Approachable** - At Bitmore we keep it real, we're not an aloof corporate driven by profit and marketing spin. We see ourselves less as a company and more as a movement.

**Inventive** – At Bitmore our curiosity means that we're constantly looking for innovative ways to meet our customer's needs.

**Caring** - At Bitmore we care about the small things that matter to our customers and collectively make a big difference to the world we live in.

**Imaginative** - At Bitmore, our thinking is not limited by category conventions on how to do things. Our success (and fun) lies in finding new ways to do things.

**Integrity** – Being present and operating with transparency, dignity, and respect.

**Sustainability** - At Bitmore, sustainability is woven into everything we do whether it's changing the way we package our products or ensuring we source materials as sustainably as possible.

## OUR PRINCIPLES

### LABOUR

- **Decent hours:** Observe the law and international standards regarding hours of work and the right of workers to balance their work and private lives. A
- **Fair remuneration:** Respect the right of workers to receive fair remuneration.
- **Freely chosen employment:** Do not engage in any form of forced servitude, trafficked or non-voluntary labour.
- **Humane treatment:** Workers are treated with dignity and respect. They are not subject to inhumane or degrading treatment, corporal punishment, mental or physical coercion and/or verbal abuse, including any forms of harassment.
- **Human resource development:** Find, secure, guide, and develop employees whose talents and desires are compatible with the company's operating needs and goals.
- **No child labour:** Do not hire any worker below the legal minimum age.



- **No discrimination:** Provide equal opportunities and do not discriminate against workers due to their sex, age, sexual orientation, religious beliefs, political conviction, gender identity or expression, culture, origin, colour, disability, nationality, life stage or any other characteristic protected by applicable laws.
- **Diversity and inclusion:** Cultivate a diverse and inclusive workplace, rooted in ethical behaviours, with respect for individuals of all backgrounds, capabilities, and opinions.
- **No precarious employment:** Hire workers based on documented and understandable contracts in accordance with the law and international standards.
- **Special protection for young workers:** Provide special protection to any workers that are not yet adults.

## HEALTH and SAFETY

- **Consumer health protection:** Control consumer exposure to potential hazards through proper design, manufacture, and communication.
- **Decent sanitation, food, and housing:** Provide ready access to clean toilet facilities, potable water and where applicable to sanitary eating and residence facilities.
- **Emergency preparedness:** Minimise the harm to life, the environment and property in potential emergency situations and events.
- **Industrial hygiene protection:** Minimise and control the exposure to chemical, biological and physical agents.
- **Occupational injury and illness prevention:** Prevent and minimise occupational injury and illness.
- **Occupational Safety Protection:** Minimise and control exposure to potential safety hazards through proper design, engineering, administrative controls, and ongoing safety training.

## ENVIRONMENTAL

- **Climate change mitigation and biodiversity protection and regeneration:**

Contribute to a carbon net zero and nature-positive world with:

- a reduction of greenhouse gas emissions in the value chain.
- sustainable use of resources: reduce or eliminate energy and resources consumption at the source, use low impact energies, trace, and use sustainable raw materials and components, and limit water use.

- pollution minimisation: reduce or eliminate waste of all types at the source, recycle as much as possible, create a circular economy, control, and treat air emissions, hazardous substances, wastewater, and solid waste prior to discharge.
- a positive contribution to protecting and regenerating biodiversity, increasing carbon sinks, and avoiding deforestation, both within and outside the value chain.
- **Good material use:** Comply with all applicable laws and regulations regarding the prohibition of or restrictions on specific substances in products.
- **No animal use:** Minimise the use of any ingredient or product derived from animals, except from beehives. Do not test on animals in the product development or manufacturing process. Be committed to working actively towards the abolition of animal testing of beauty products worldwide.

## ETHICS

- **Apolitical business stance:** No contributions of resources such as money, goods or services to political candidates or parties.
- **Business integrity:** Uphold the highest standards of integrity in all business interactions, with a zero tolerance for all forms of bribery, corruption, extortion, and embezzlement.
- **Disclosure of Information:** Disclose information in accordance with applicable regulations and international practices. Do not falsify records or misrepresent.
- **Fair business, advertising, and competition:** Uphold standards of fair business, advertising, and competition.
- **Intellectual property protection:** Respect intellectual property rights, transfer of technology and know-how, protect intellectual property rights and safeguard customer information.
- **Privacy protection:** Protect the privacy of personal information in compliance with privacy and information security laws and international requirements.
- **Protection of identity and non-retaliation:** Ensure 'no fear of retaliation' and protect the confidentiality and anonymity of anyone raising any concerns/suggestions.
- **Responsible sourcing:** Contribute actively to minimising the negative impact on people and the planet and maintain a chain of custody.
- **No improper advantage:** No direct or indirect bribes or other means of obtaining undue or improper advantage.
- **Avoid conflict of interest:** Disclose to management if there is a potential conflict of interest which might influence or appear to influence our judgement and actions.

- **Acceptance of gifts/entertainment/hospitality:** Stay within reasonable limits, disclose all such offers to management and always ask oneself the reason for and legitimacy of them.
- **Insider trading and market misconduct:** Comply with laws and internal policies for directors, officers, employees, and relatives to prevent fraudulent activities.
- **Anti-money laundering:** Play our part in ensuring that our activities are not used to launder money from criminal activities.

## IMPLEMENTATION

### Minimum expectation

The principles set out in this Code of Business Conduct represent BITMORE LIMITED's aspirational goals and minimum expectations.

Even though the aspirations will remain unchanged, the minimum expectations of the Code of Business Conduct, which are translated into verifiable standards, may change in line with societal changes. BITMORE LIMITED encourages all to go beyond legal compliance to advance corporate responsibility, business ethics and good corporate citizenship.

### Applicable law

Applicable law in this Code of Business Conduct means any state, national, regional, local and domestic laws, common laws and customs, administrative laws, regulations, rules, orders, interpretations, permits, standards, judgements, decrees, injunctions, writs and orders of any court, governmental body or arbitrator that apply in the country where an activity takes place or has impact. If the applicable law and the requirements in this Code of Business Conduct are in conflict, or set a different standard of protection, the principles that provide the highest protection to the workers and the environment prevails.

### Value chain

Each of us has the capacity to influence changes in their value chains through their purchasing activities and business behaviours. Relationships with all business partners must be managed in a responsible way, and we expect the same in return.

That requires a cooperative approach where every business enterprise (a) involves its respective business partners, (b) takes all reasonable and appropriate measures in its sphere of influence needed to implement this Code of Business Conduct and (c) exchanges information to identify in a timely fashion any challenges that require mitigation.





This responsibility must be embedded in the value chain management to prevent and address any adverse impacts that may be detected in the value chain. The due diligence process and development of the necessary management systems, policies and processes are included in this responsibility.

## **Worker involvement**

Good management practices must be established that involve workers and their representatives in sound information exchange on workplace issues and allow for appropriate measures for protecting workers in line with the aspirations outlined in this Code of Business Conduct. Sufficient competence amongst employers, managers, workers, and worker representatives must be in place to maintain these good management practices. Specific steps must be taken to make workers aware of their rights and responsibilities.

Continuous education and training at each level of the organisation is essential to ensuring awareness and clear understanding of this Code and of the relevant associated behaviours. Such programmes will be proposed on a regularly basis.

Effective operational-level grievance mechanisms must be established for individuals and communities potentially adversely impacted. Even where judicial systems are effective and well-resourced, grievance mechanisms may offer advantages such as speed of access and remediation, reduced costs, and transnational reach.

## **Company commitment and accountability**

For each business partner, a Code of Business Conduct statement affirming the commitment to compliance with the requirements in this Code, endorsed by executive management, must be available in the language of the employees/workers and acknowledged at the start of the business relationship.

## **Risk assessment and risk management**

An adequate and effective risk assessment process must be in place to identify legal compliance, environmental, health and safety, labour practice and ethics risks, including the determination of the relative significance of each risk and implementation of appropriate procedural and physical controls.

## **Improvement objectives**

To engage in continuous improvement, written performance objectives, targets and implementation plans for improvement should be in place, including a periodic assessment of performance in achieving those objectives.



## Audits and assessments

Periodic self-evaluations must be performed to ensure conformity with legal, policy and contractual requirements. Creation and maintenance of records to ensure regulatory compliance and demonstrate Code conformity and performance must be kept, with appropriate confidentiality considerations. Any BITMORE LIMITED value chain entity waives the right to refuse access to BITMORE LIMITED representative to verify conformance with the requirements of this policy and its implementation.

## Raising concerns

Reporting channels must be implemented to allow the raising of questions or concerns about a potential violation of the law or principles of the Code of Business Conduct. As part of our feedback culture, speaking up should be encouraged in an environment that fosters and enables ethical behaviour where employees are comfortable speaking up without fear of retaliation or loss of anonymity, where permitted by law.

## Conformance failure

All severe and deliberate failings regarding the values, principles and implementation set forth in this Code of Business Conduct can result in the termination of the relationship with BITMORE LIMITED.

