



SIMBA SLEEP SUPPLIER CODE OF CONDUCT

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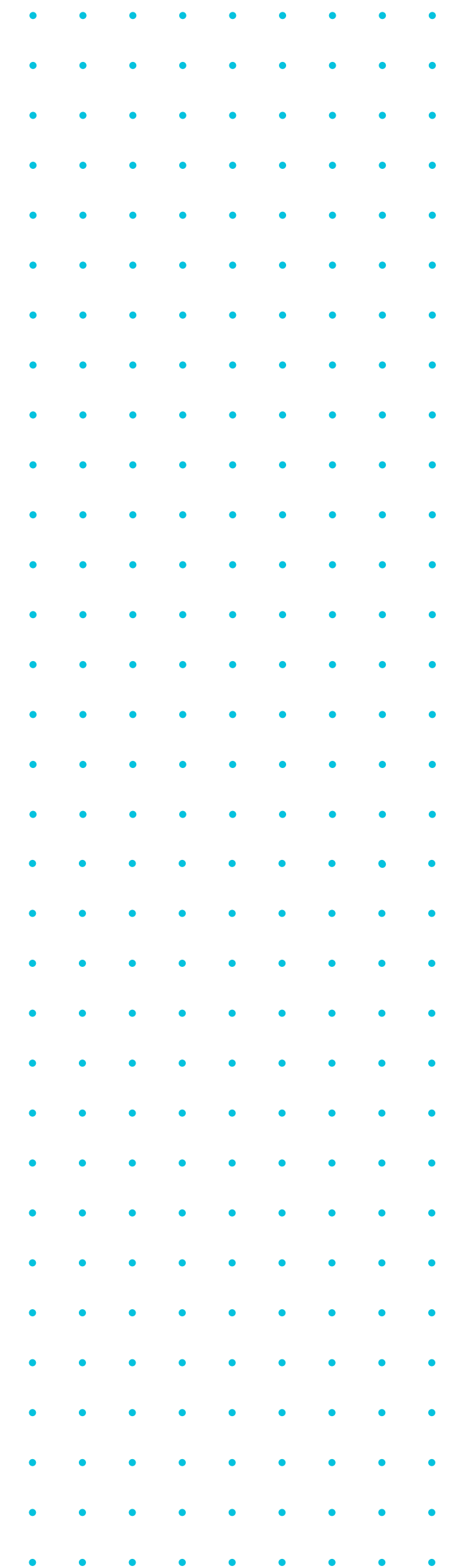
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INTRODUCTION

Here at Simba Sleep we are totally committed to running our business in a responsible and sustainable way; we constantly assess and carefully manage our environmental and social impacts, and we always seek to create benefit for all the people and communities whose lives we touch.

We also employ a selection of third-party suppliers throughout our business activities, so it's essential that these suppliers work with us to ensure the responsible and sustainable practices we believe in are in place throughout our supply chain; these third-party suppliers include manufacturers and retailers of our mattresses, bed bases, and bed accessories in the UK, Europe, China and Canada, as well as the logistics businesses who deliver them. We also work with third party recycling facilities to determine the suitability of products for the second-hand market or to identify and process materials to be recycled.

We hope to work with all our suppliers in a partnership of ongoing improvement, and we strongly believe that this cooperation will benefit not just us and our suppliers, but all the local communities where we operate. The Simba Sleep Supplier Code of Conduct is designed to set the standards by which we will build these long-term partnerships, and by which we should aim to conduct all our business.

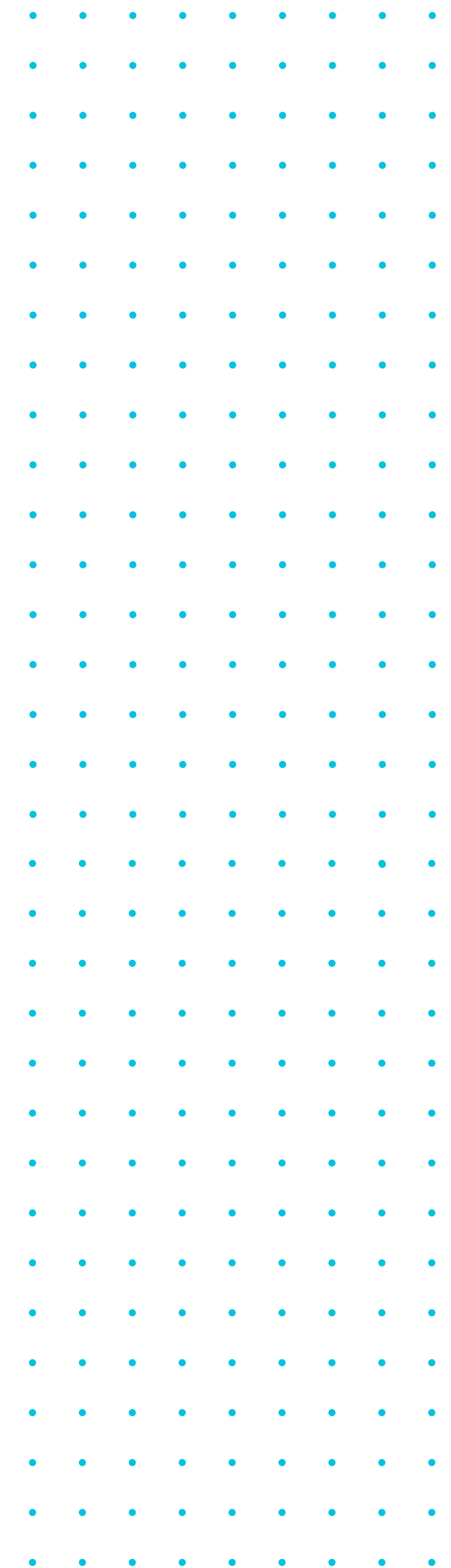


OBJECTIVES AND SCOPE OF OUR SUPPLIER CODE OF CONDUCT

The Simba Sleep Supplier Code of Conduct is applicable to all our suppliers of goods and services, manufacturers and business partners, along with their subsidiaries, affiliates, sub-contractors, and agency providers.

It sets out Simba's own social and environmental principles, our preferred terms of engagement, and the benefits to all of sustainability; we've based these commitments on the 10 Principles of the United Nations Global Compact and in alignment with the Declaration on Human Rights and ILO standards.

But it's also designed to clarify what Simba expects from its suppliers and trading partners - namely that they adhere to the same social and environmental standards- and as such it represents the minimum requirement for Simba to initiate or conduct business with any group, company or business. We also expect our suppliers to follow these same principles in their own supply chains, and to take a similar approach with their own suppliers.

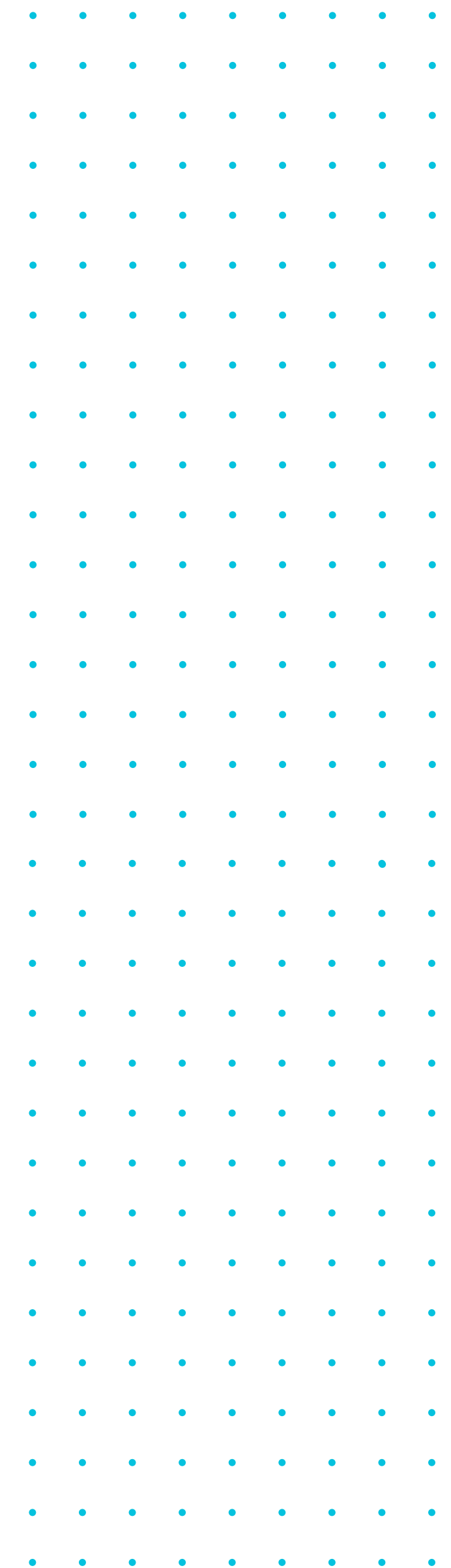


REQUIREMENTS AND TERMS OF ENGAGEMENT

KEY REQUIREMENTS OF THE SIMBA SLEEP SUPPLIER CODE OF CONDUCT

We expect our suppliers to follow these six principles:

1. Comply with all relevant national laws and legal regulations.
2. Adopt a responsible and ethical approach to business.
3. Ensure no Modern Slavery occurs in their own business, or in their supply chains.
4. Protect the human rights of suppliers' employees and the rights of employees further down suppliers' supply chains, and ensure the promotion of fair and non-discriminatory labour practices in their business and supply chains.
5. Manage and reduce environmental impacts in their own business, and in their supply chains.
6. Identify and manage supply chain risks in their own business, and in their supply chains.

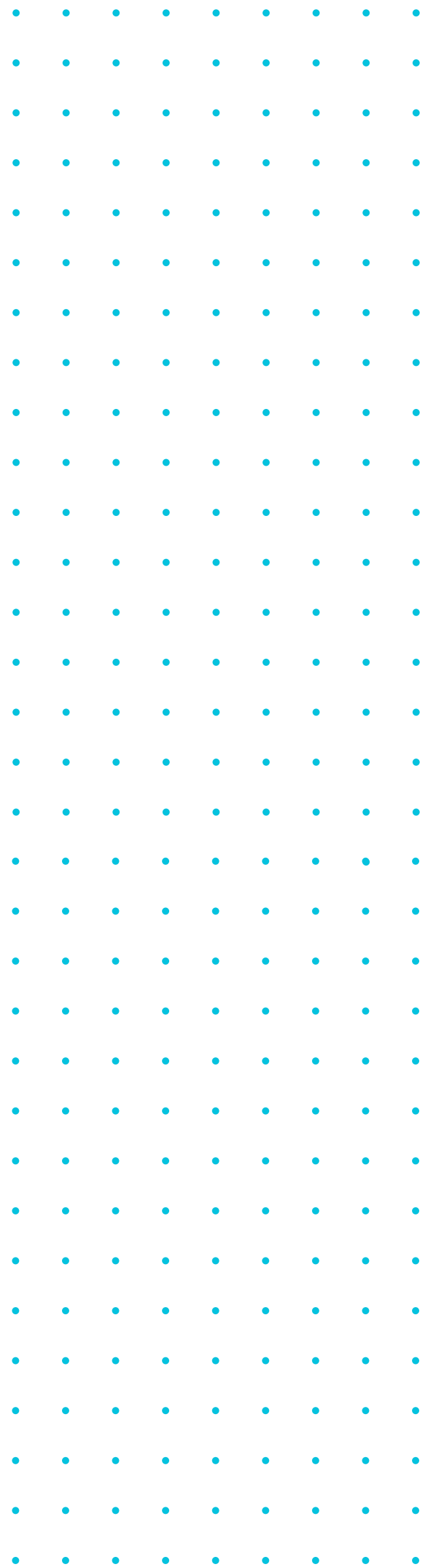


RULES OF ENGAGEMENT

We hope that our suppliers appreciate the importance of the Simba Sleep Supplier Code of Conduct, and that they will work with us to identify risks and areas of improvement, as well as to follow up agreed actions. We in turn pledge to engage with our suppliers during the procurement lifecycle on sustainability issues and opportunities.

Given their importance to us, we should be clear that we may incorporate our sustainability considerations into our supplier selection process, policies, tenders, or contracts, and that we may monitor supplier performance against specific goals and targets related to sustainability.

We will use appropriate due diligence to make sure our suppliers are following the principles of our Supplier Code of Conduct; these processes may include risk assessments, and requests for information and documents as substantiation of compliance with written policies and practices, as well as supplier audits. Should a supplier fail to comply, respond in a timely manner, or provide information requested, it may result in follow up action on our part, up to and including the potential conclusion of our relationship with the supplier.



REQUIREMENT 1:

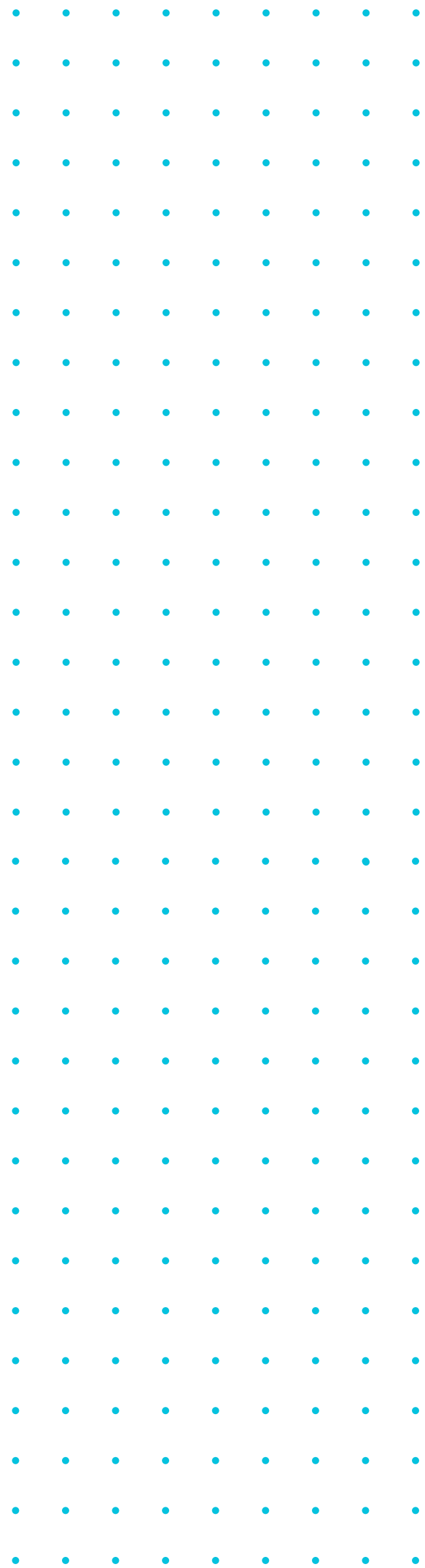
LAWS AND LEGAL REGULATIONS

COMPLY WITH ALL RELEVANT NATIONAL LAWS AND REGULATIONS

Simba requires all suppliers to comply in all material respects with all relevant national laws and regulations related to business practices, labour and human rights and environmental protection. If you as a supplier learn of any possible issues relating to compliance obligations around legislation, regulations, business practices, and labour or human rights, which relate to doing business with Simba Sleep, you should seek guidance from your point of contact at Simba Sleep about whether this should be discussed with parties at Simba Sleep involved with sustainability and compliance.

We expect our suppliers to deliver products and services that meet all safety and quality standards required by applicable laws.

Suppliers shall also comply with all applicable data protection, privacy and information security laws and regulations including, without limitations, such laws pertaining to Simba Sleep customers, Simba Sleep employees or other suppliers, wherever those customers, employees, or other suppliers may be located. In the UK, the primary Data Protection Law is the Data Protection Act 2018. Other jurisdictions will have other Data Protection Laws, whether national or more broadly. For example, all EU jurisdictions are required to both implement their national laws, and the EU GDPR. Compliance with the Data Protection Laws which apply to them is the responsibility of all Suppliers. Suppliers shall not render any service in any jurisdiction in a manner that causes Simba Sleep to violate Data Protection Laws applicable in any relevant jurisdiction.



REQUIREMENT 2:

ETHICS

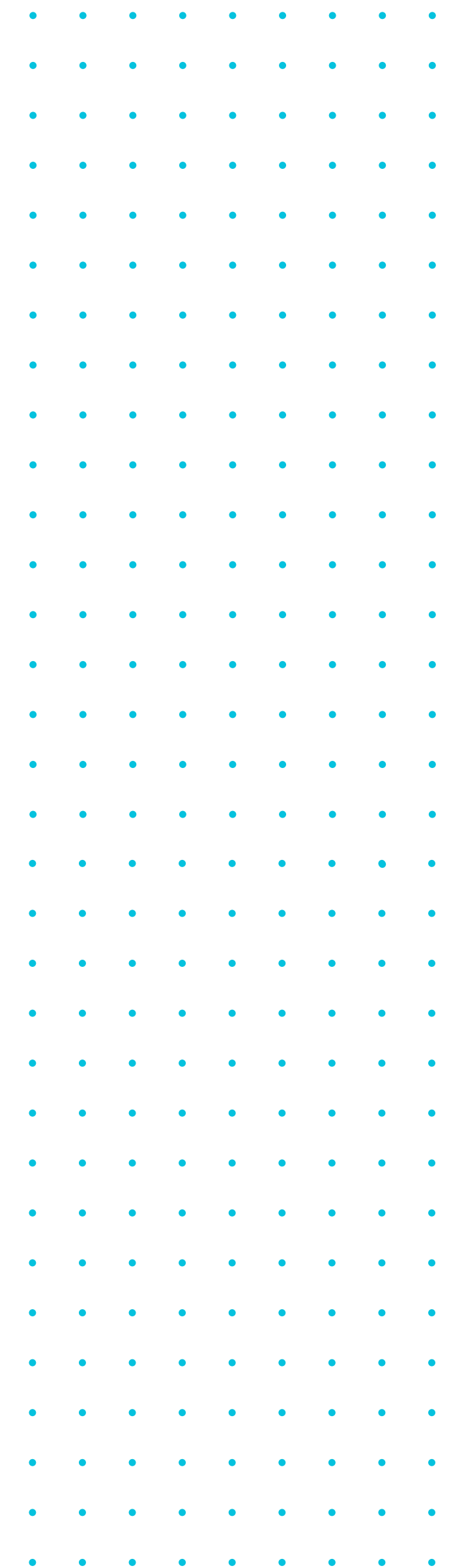
ADOPT A RESPONSIBLE AND ETHICAL APPROACH TO BUSINESS

We expect our suppliers to act ethically and with integrity in all business dealings in the UK and elsewhere; to be clear, Simba Sleep has a zero-tolerance approach to bribery and corruption of any kind.

Suppliers should:

- Comply with applicable laws, rules and regulations relating to countering bribery and corruption, and implement and enforce effective systems and controls.
- Avoid conflicts of interest.
- Avoid potential conflicts of interest .
- Engage in fair dealings with their suppliers.
- Not engage in conduct generally known as Insider Trading.
- Never make, offer, solicit, or encourage “facilitation payments” under any circumstances.
- Maintain confidentiality where necessary.
- Not practice discrimination in any form.
- Maintain accurate records.
- Retain accurate records for not less than periods prescribed by law or good practice.
- Not engage in tax evasion.

We also expect that our suppliers will hold their own suppliers to the same high standards of business conduct and ethics.



REQUIREMENT 3:

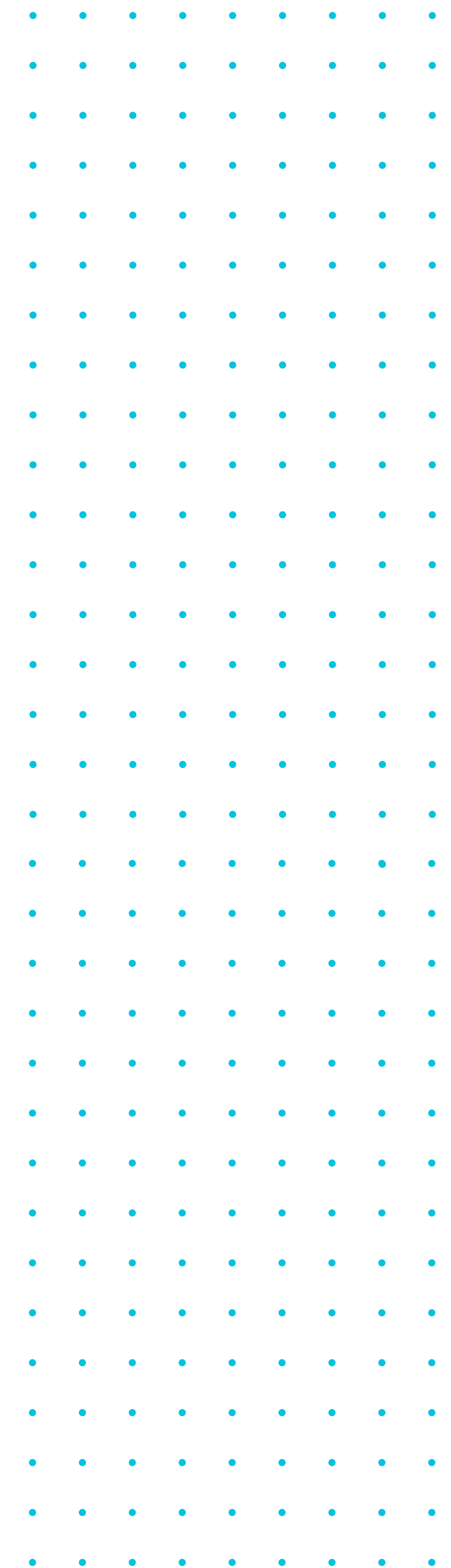
MODERN SLAVERY

TAKE ACTION AGAINST MODERN SLAVERY

SIMBA SLEEP HAS A ZERO-TOLERANCE APPROACH TO MODERN SLAVERY.

Modern Slavery is a crime and a violation of fundamental human rights. Set out in the Modern Slavery Act 2018, Modern Slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We expect the same zero tolerance of Modern Slavery from all our contractors, suppliers and other business partners, and we expect our suppliers to hold their own suppliers to the same high standards and to alert us to any risks associated with Modern Slavery which they have uncovered in their supply chains.

Suppliers must comply at all times with our Modern Slavery Policy and all applicable laws and regulation regarding slavery, human trafficking and compulsory labour practices including the Modern Slavery Act; suppliers must also maintain a complete set of records to trace the supply chain of all goods and services provided.



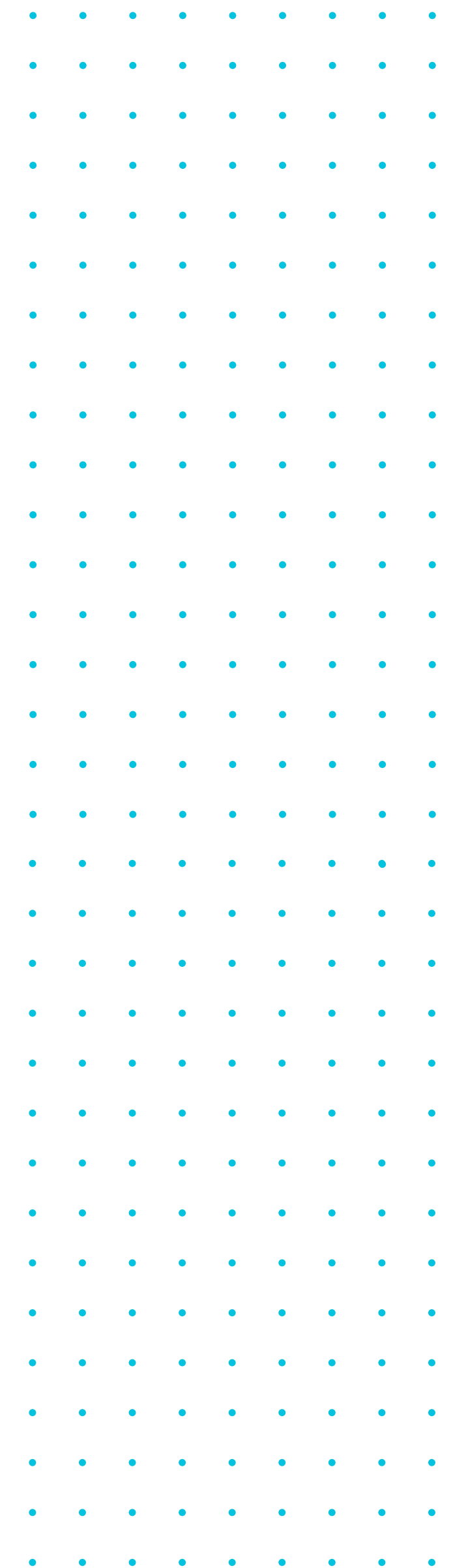
REQUIREMENT 4:

HUMAN AND SOCIAL RIGHTS

Our aim is to develop a supply chain that adheres to the Simba Sleep Supplier Code of Conduct, which in turn reflects our commitment to the International Principles of Human Rights expressed in our Modern Slavery Policy, to United Nations Guiding Principles, and to those principles contained within the UK Government Modern Slavery Act 2015. We are also fully committed to the protection of workers' rights, as defined in the International Labour Organisation's (ILO) core conventions, as well as the requirements aligned to the Ethical Trading Initiative (ETI) base code.

Simba Sleep expects its suppliers to both understand and take responsibility for the implementation of the Simba Sleep Supplier Code of Practice standards throughout their own supply chains and business operations.

1. No coercion in employment. There must be no form of Modern Slavery or forced labour. No employee should be obliged to work through force, financial pressure, intimidation, or by any other means.
2. Freedom of association and the right to collective bargaining. Suppliers and their factories must recognise and respect the rights of employees to join and organise associations of their own choosing, and to bargain collectively. Suppliers must not obstruct parallel means for free association and collective bargaining where permitted.
3. Health and Safety. A safe, clean and hygienic environment should be provided, taking into account the specific hazards of the industry in which our suppliers operate. A senior manager should be appointed as the Health and Safety representation for the supplier.
4. No child labour. Children under the age of 15 (or as set by law, whichever is higher) shall not be recruited or employed. Children and young persons under the age of 18 shall not be employed at night or in hazardous conditions. Policies and procedures shall conform to the relevant International Labour Organisation (ILO) policies.

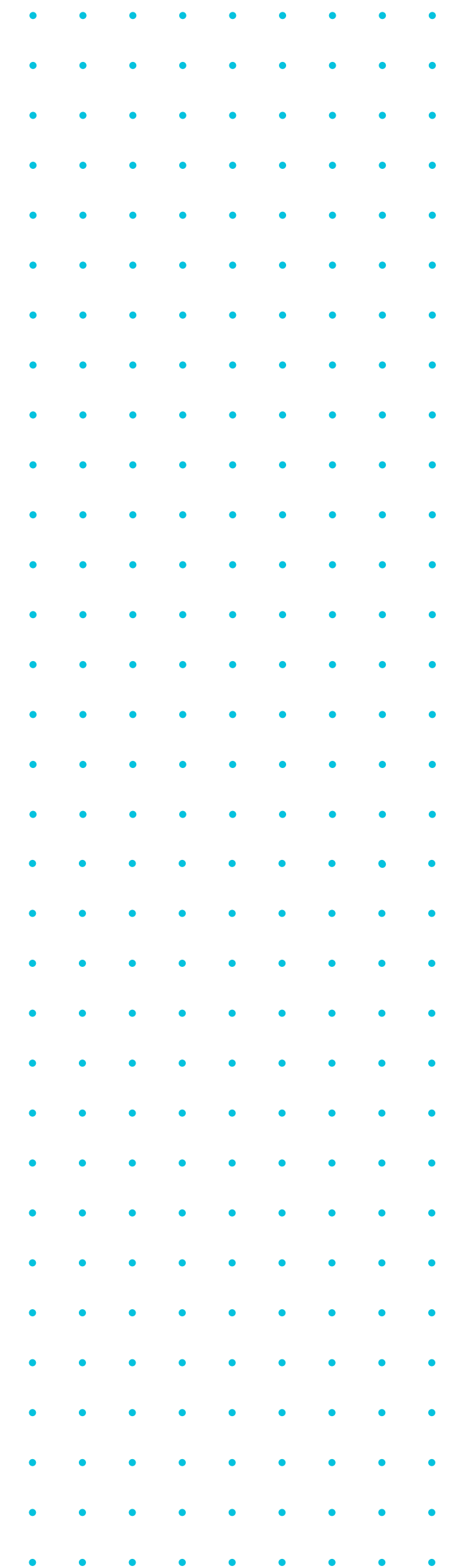


REQUIREMENT 4:

HUMAN AND SOCIAL RIGHTS (CONTINUED)

5. Fair wages and benefits. Wages and benefits paid must meet, as a minimum, national legal requirements, or industry benchmark standards, whichever is higher. All workers should be provided with written and understandable information about their employment conditions and wages and provided with wage slips for each period they are paid.
6. Reasonable working hours. Normal working hours must comply with national laws or the benchmark industry standards, whichever offers greater protection. Overtime working shall be voluntary. Employees must be compensated for overtime at the rate legally required in the country of manufacture or at a rate exceeding the regular hourly compensation rate, whichever is higher.
7. No discriminatory practices. All employees shall be afforded equality of treatment. There must be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, union, or political membership.
8. Regular employment. Wherever reasonably practicable, and in compliance with national legal requirements, all workers should enjoy security and stability of employment and regularity of income.
9. Respectful treatment of employees. Employees must be treated with respect and dignity, and be employed in a workplace free of harassment, abuse, and degrading treatment. No employee will be subject to physical, sexual, mental or any other form of abuse or harassment or corporal punishment.

Please contact Simba Sleep if you would like to view our Modern Slavery Policy. Our Modern Slavery statement will be available to view on the website.



REQUIREMENT 5:

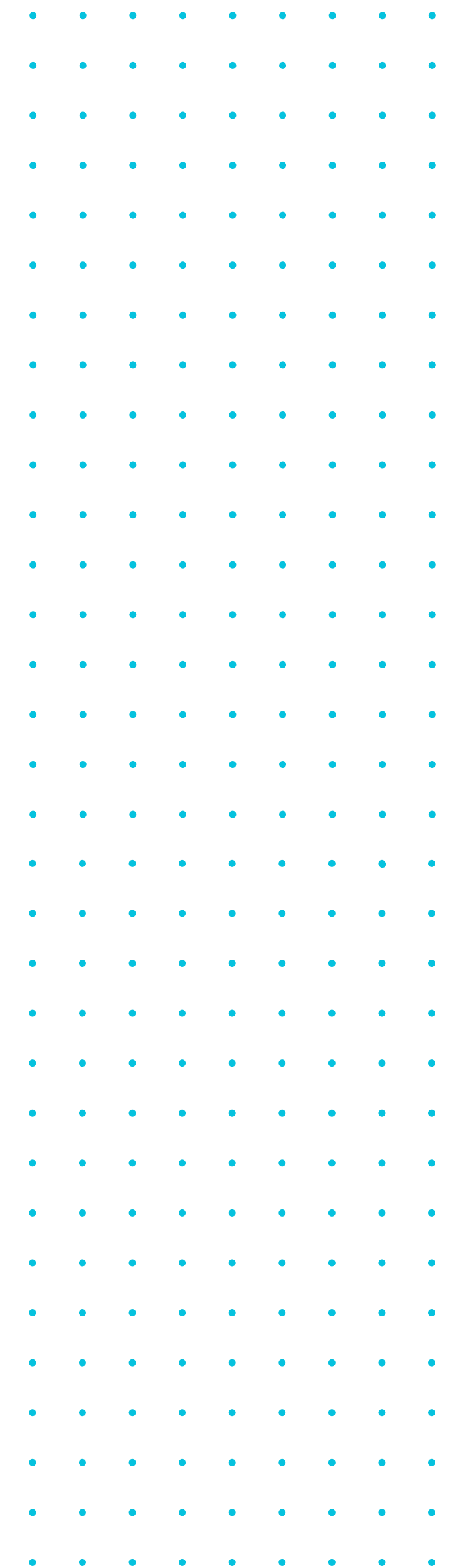
ENVIRONMENT MANAGEMENT

MANAGE AND REDUCE ENVIRONMENTAL IMPACT

We're committed to protecting the natural environment for a sustainable future, so we work hard to manage and reduce the environmental impact of what we do. We therefore encourage our suppliers to do the same, which means explicitly considering lifecycle resource usage, waste and emissions.

SPECIFICALLY, OUR SUPPLIERS SHOULD:

- Ensure compliance in all material respects with all applicable environmental legislation. This includes developing, implementing, and publishing our approaches to caring for the environment.
- Seek to purchase supplies and equipment which are low impact, and use sustainably sourced materials, including recycled content where possible
- Aim to use low impact methods for both inbound and outbound freight or shipping.
- Endeavour to produce goods which are designed to last and can be re-used or recycled at the end of their service life.
- Actively set targets to reduce water use, production waste, and transport emissions, and report on these.
- Understand their carbon footprint and set targets to reduce greenhouse gas emissions.

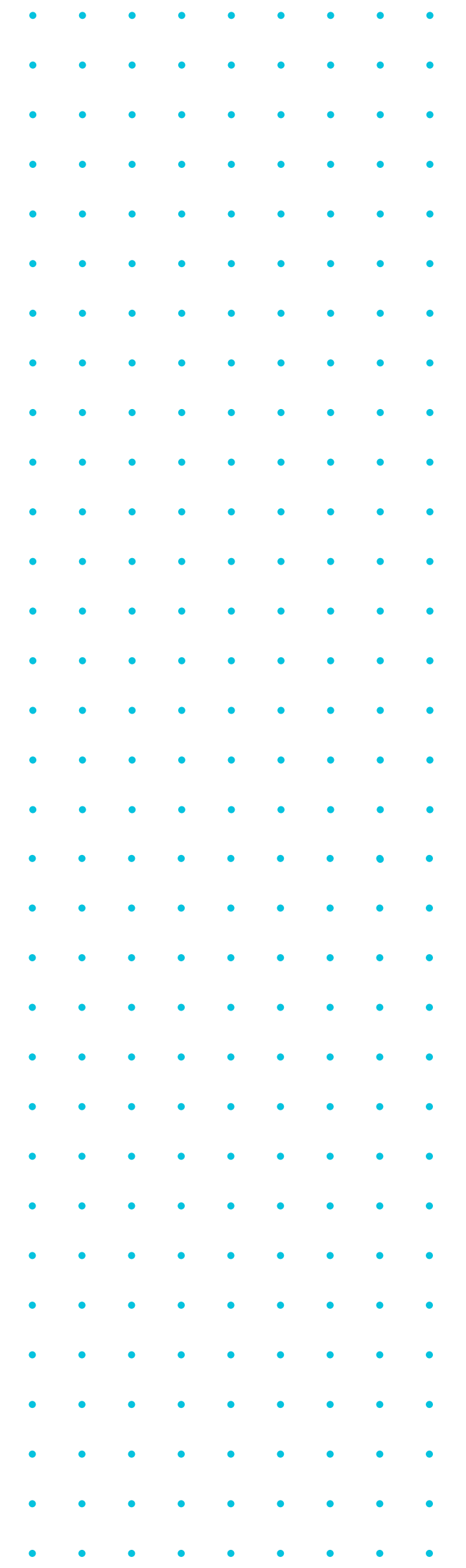


REQUIREMENT 5:

ENVIRONMENT MANAGEMENT (CONTINUED)

WHEN PROCURING GOODS OR SERVICES AND SELECTING SUPPLIERS, SIMBA SLEEP RESERVES THE RIGHT TO EVALUATE THE FOLLOWING AS PART OF OUR SELECTION CRITERIA:

- Preferred materials in manufacture of purchases, components, subassemblies or finished products, e.g. recycled materials, locally sourced materials, sustainably sourced timber, reduced plastic packaging and the avoidance of certain hazardous chemicals.
- Methods and standards used in the manufacturing process e.g. renewable energy, low carbon footprint, certified management systems (e.g. ISO 14001 or equivalent).
- Supply-chain management processes, e.g. environmental monitoring, management systems.
- A preference towards the use by Supplier of suppliers which are local to that Supplier, wherever feasible.
- Logistics, transport and delivery requirements, e.g. transport planning and fleet management for reduced fuel use and emissions, returnable transit packaging, take-back options etc.



REQUIREMENT 6:

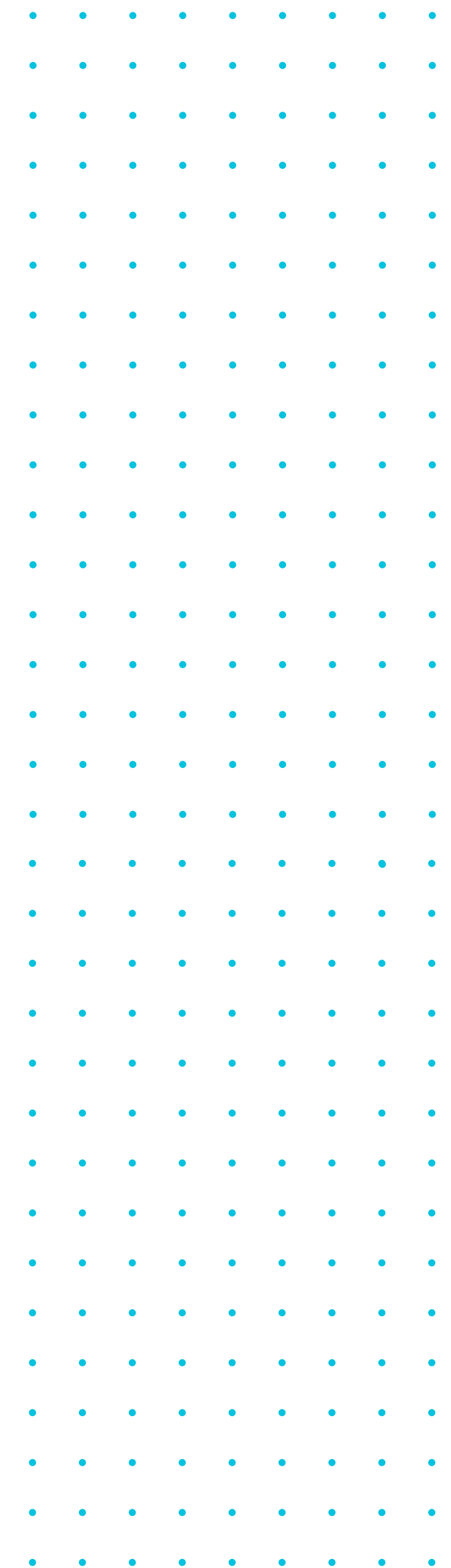
BUSINESS AND SUPPLY CHAIN RISK

IDENTIFY AND MANAGE BUSINESS AND SUPPLY CHAIN RISKS

Simba Sleep reserves the right to check supplier compliance with the requirements of the Simba Sleep Supplier Code of Conduct, for example through self-assessments and audits which may be carried out by Simba Sleep or through a third party. If a breach is identified, the supplier shall create an incident report and present a corrective action plan.

Suppliers are expected to adopt a risk-based due diligence approach to their own supply chains which focuses on:

- Processes for identifying and managing the environmental, health, safety and risks associated with their operational and labour practices, and ensuring regulatory compliance.
- Establishing adequate training and capacity building programme to mitigate risks.
- Identifying key suppliers based on spend, degree of dominance and influence, and potential level of environmental, social and governance (ESG) risks.
- Implementing follow up actions such as supplier assessments, requests for documentary evidence of the supplier's policies and practices, audits of suppliers where deemed necessary, and initiating and monitoring correct action plans.
- Maintaining records of risk assessment, incidents and corrective actions and providing evidence to Simba Sleep as appropriate.



SUPPLIER DECLARATION

SUPPLIER DECLARATION

Simba Sleep expects all its suppliers to comply with, and adhere to, the Simba Sleep Supplier Code; suppliers must inform us promptly of any breach of or concerns related to this Supplier Code.

Suppliers must take steps to ensure that their employees, suppliers and subcontractors who work on matters supporting Simba Sleep's business are aware of, and comply, with this Supplier Code. Suppliers are expected to improve their sustainability performance by implementing appropriate measures on an ongoing basis.

Simba Sleep may visit your facilities, review your documentation and conduct a full audit if necessary, to ensure compliance with this Supplier Code.

Supplier understands Simba Sleep reserves the right to take appropriate action, up to and including the termination of supply agreements for grounds such as material breach, for any violations of applicable law or this Supplier Code, at its sole discretion.

The Supplier acknowledges receipt of the Simba Sleep Supplier Code and seeks to conform with it.

Signed:

Name:

Role:

Date:

