



Next 15 Group plc

The Supplier Code of Conduct (Code)

Date: February 2026

Approved by: Sujoy Mathew, Group Head of Risk & Compliance

Version: 2

Applies to: Next 15 Group

Summary of Controls

This page is meant for the person responsible for embedding this policy in your business's daily operations. Please read the whole policy to gain a full understanding of Next 15's requirements.

Control (action(s) to be taken within daily operations)	How to demonstrate compliance to Next 15?
Suppliers who do not agree to the Next 15 Supplier Code of Conduct are not onboarded as suppliers for any businesses which are part of Next 15 Group	Annually , self-certify that suppliers who have not agreed to the Next 15 Group Supplier Code of Conduct have not been onboarded and therefore are not used.

Note: You may be subject to a Next 15 Internal Audit that requires you to show how you have embedded this policy in your daily operations.

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1. Introduction

Next 15 Group plc and its subsidiaries* (Next 15 or the Group) are committed to running a sustainable, equitable and diverse organisation that displays leadership in governance and values. The Group has placed business ethics at the forefront of its business practices, and to that end is committed to acting ethically and with integrity in all business dealings and relationships.

Our Suppliers (any entity, individual or partnership that supplies products or services to the Group) play an important role in our business, and therefore our values, which is why we expect them to reflect our three core principles embedded in this Code. These principles set out the minimum standards that must be met by any Supplier who works with Next 15. In return, we strive to be a fair and honest partner, firmly believing that relationships built on trust and integrity are most sustainable and mutually beneficial to all.

2. About the Code

All Suppliers (including their workers / employees and own supply chain) must comply with the Code. As such, Suppliers shall also be responsible for their own employees' and Suppliers' acts or omissions, including non-adherence to the Code. Failure to adhere or comply with the Code may result in the termination of a Supplier relationship.

Next 15 has the right to vary the Code from time to time. If there is a conflict between the provisions of an agreement with the Group and the provisions of the Code, the Supplier shall meet the higher standard.

3. New Supplier Form(s)

As part of Next 15's commitment to continuous improvement with respect to our social, environmental and governance principles, we ask that Suppliers demonstrate compliance with the Code by completing our New Supplier Form and our Supplier Assessment Form.

We may require Suppliers to re-perform this at certain intervals where necessary. This will ensure we monitor and report on our own progress over time. All Suppliers must provide information in a complete and timely manner and work with the Group to resolve any issues.

4. Our Next 15 Principles

▪ Principle 1: A safe, responsible and ethical workplace for everyone

Our people are our most important asset which is why we go to the lengths that we do to protect them and ensure they are working in an environment that is safe and

ethical. As such, Next 15 have Group policies on Anti-Corruption and Bribery (regardless of the territory of residence) and Information Security, Information Governance and GDPR.

Engagement with all Suppliers is governed by the UK Bribery Act 2021 along with section 199(6) of the Economic Crime and Corporate Transparency Act 2023 (specifying the fraud offences, including but not limited to fraudulent trading, fraud by false representation, cheating the public revenue and by failing to disclose information). Failure to comply may result in termination of the business relationship.

All of our Suppliers must disclose to us any situation that could constitute a conflict of interest, report any suspected fraudulent or unethical activity to Next 15 and refrain from using other people's intellectual property without their permission. We also ask that all of our Suppliers adhere to the following:

A. Compliance with law

Comply with all applicable local laws and regulations, including those related to issues addressed in this Code.

B. Data Protection and Information security

Comply with all applicable data protection laws (including UK GDPR, GDPR and the CCPA) and have in place appropriate measures to (a) protect the confidentiality, integrity and availability of the Group's (and its stakeholders') information held on its systems and assets and (b) ensure that there is no unauthorised access to such systems or assets.

C. Bribery and Corruption

Comply with all applicable laws relating to anti-bribery and corruption and, to that end, will not accept, offer, pay or authorise any unlawful or improper payments or benefits.

■ Principle 2: Ensure everyone is treated with dignity and respect

We believe in a culture of inclusivity without categories or constraints, we celebrate difference and believe that diversity makes our business more relevant, our work more meaningful and our people more empowered. As such, Next 15 have Group policies on Modern Slavery, Health & Safety, Equal Opportunities and Anti-Bullying and Harassment.

We ask that all of our Suppliers must adhere to the following:

D. Workforce and equal opportunities requirements

Comply with all applicable anti-slavery, human trafficking and child labour legislation. This includes, but is not limited to, not supporting or engaging or requiring any forced labour, the use of child labour, bonded labour, indentured labour and prison labour;

Comply with all internationally recognised human rights legislation;

Not discriminate in hiring, compensation or any other employment practice based on race, gender, gender identity, religion, age, sexual orientation or any other characteristic other than the worker's ability to perform the job and have policies in place to prevent any victimisation or harassment in respect of the same;

Provide a safe, healthy and sanitary working environment in compliance with all applicable health and safety laws; and

Compensate all workers with the applicable living wage, which includes with respect to workers

▪ **Principle 3: Take ownership of our environmental impact**

We hope that our Group Environment Policy, combined with our emissions reporting, including our reduction trajectory, and our alignment with sustainability reporting requirements such as Climate-related Financial Disclosures and SECR, demonstrates our commitment to understanding and minimising our environmental impact.

We ask that all of our Suppliers must adhere to the following:

E. Environmental Responsibility

Comply with all applicable environmental laws and standards with respect to its business and have in place processes to assess its environmental impact and to continuously improve environmental performance.

5. Continuous Improvement

Next 15 is committed to continuous improvement across all aspects of Environmental, Social and Governance performance. For more information, please refer to our most recent Annual Report, available on our website.

We look forward to working with you and thank you for helping us in our mission to support a sustainable and ethical future for everyone.

Sujoy Mathew

Group Head of Risk & Compliance

**Activate; Brandwidth; Elvis; Marker Collective; M Booth; M Booth Health; MHP Group; Pretzl; Savanta; Shopper Media Group (SMG); Transform*

6. Appendix - versioning & document history

Current document version	2
Date this document was last reviewed	February 2026
Date of next review	March 2027

Document history

Version	Date	Author	Approver	Document Description
1	June, 2023	Next 15 Legal Team	Jonathan Peachey	Policy has been written and approved
2	November, 2025	Guillaume Trouvilliez, Next 15 Risk & Compliance team	Sujoy Mathew, Group Head of Risk & Compliance team	Reference to the ECCTA (Economic Crime and Transparency Act) from 2023 was added – and subsidiaries were updated following group structure change