



**restaurant  
brands  
europe**

**BURGER KING.** **POPEYES.** *Tim Hortons.*

## **SUPPLIER CODE OF CONDUCT OF RB EUROPE GROUP**

Version approved by the Board of Directors of Restaurant Brands  
Europe, S.A.U., dated 25 February 2025

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## **1. INTRODUCTION**

Restaurant Brands Europe Group (hereinafter referred to as RBE, RB EUROPE Group and/or the Company) deals with suppliers of goods and services in an ethical and lawful manner. All suppliers shall operate in full compliance with the regulations in force.

Special attention, due diligence and care shall be used in the supplier evaluation and selection processes in order to avoid any business relationship with individuals or legal entities that may be involved in unethical or dishonest conduct or behaviour, and in particular, in activities related to corruption of children, fraud, corruption and money laundering, and terrorist financing.

RB EUROPE Group will value positively those suppliers who show their commitment to the principles promoted in this Code of Conduct by their acceptance of and compliance. The Company also reserves the right to terminate its contractual relationship with suppliers who are in repeated or serious breach of the Code.

## **2. PURPOSE**

The purpose of this Supplier Code of Conduct (hereinafter referred to as the Code) is to serve as a guide for the actions of suppliers that are linked to any of the companies of the RB EUROPE Group.

## **3. SCOPE OF APPLICATION**

This Code of Conduct applies to all suppliers, consultants, agents and any other third parties partnering with RB EUROPE Group, regardless of their location.

## **4. COMMITMENTS OF RB EUROPE GROUP SUPPLIERS**

The ethical principles to be followed by the suppliers of RB EUROPE Group shall be expressly accepted prior to the commencement of the contractual relationship.

The provisions of this Code are without prejudice to any additional conditions or requirements that may be required by RB EUROPE Group.

Suppliers shall develop their business relationships in accordance with the following requirements:

- a. Ethical Behaviour:** Suppliers shall at all times maintain an ethical and transparent behaviour in their business transactions.
- b. Legal Compliance:** Suppliers shall comply with the RB EUROPE Group's policies and procedures relating to the prevention of criminal offences as well as with applicable national and international crime prevention laws.
- c. Corruption:** Suppliers shall comply with all corruption laws and regulations and shall not corruptly promise, offer or pay, directly or indirectly, money and other valuable goods, in order to influence an act or decision by a third party or a Company employee; to obtain an undue advantage for the RB EUROPE Group or to induce a third party or Group professional to influence a public official.
- d. Bribery:** Suppliers shall comply with all bribery laws and regulations and shall not promise, offer or pay, directly or indirectly, any bribe to any third party or any employee of the Company.

- e. **Prevention of Money Laundering and Terrorist Financing:** Suppliers shall comply with all laws and regulations on the prevention of money laundering and terrorist financing and shall not make or offer, directly or indirectly, unlawful cash payments.
- f. **Bribery of Public Officials:** Suppliers shall not promise, offer or give gifts or objects of value of any nature whatsoever to public officials in connection with the conclusion of their contracts with RB EUROPE Group companies.
- g. **Gifts:** Suppliers may not offer or give gifts, presents or hospitality to RB EUROPE Group employees, except when these correspond to business practices or signs of courtesy provided for in the Company's gift procedure, are of symbolic or irrelevant economic value and are not made with the intention of influencing the objectivity and independence of the conclusion of the contract.
- h. **Conflict of Interest:** Suppliers shall avoid any activity that could lead to a potential and/or particular conflict of interest and affect the independence of the supplier's actions and its full compliance with applicable laws. In the event of a potential conflict of interest, the supplier shall abstain from deliberations or decision-making.
- i. **Personal Data Protection:** The Company guarantees at all times the right to data protection of all data subjects related to RB EUROPE, protecting and making appropriate use of them, respecting in any case the applicable laws and the standards set by RB EUROPE Group.
- j. **Confidential Information:** Company information entrusted to the supplier shall generally be treated as secret or confidential information. Suppliers and their respective professionals are responsible for adopting sufficient technical and organisational security measures to safeguard such information.
- k. **Food Safety:** Suppliers shall ensure food safety standards, hygiene and quality requirements and shall create, implement and maintain permanent procedures based on the HACCP principles of RBE.
- l. **Safety and Quality:** All products and services delivered by suppliers shall comply with the quality and safety standards and parameters required both by applicable laws and by RB EUROPE Group.
- m. **Human Rights:** The Company's suppliers must respect compliance with internationally recognised Human Rights and ensure that they do not abuse these rights in their business operations. Therefore, all suppliers shall treat their employees with dignity and respect. In no case shall physical or psychological punishment, harassment of any kind, or abuse of power be permitted, respecting in all cases their labour rights.
- n. **Environmental Responsibility:** Suppliers shall maintain a precautionary approach focusing on the challenge of environmental protection, adopt methods that benefit greater environmental responsibility and encourage the development and dissemination of environmentally friendly technologies.
- o. **Personality Rights:** Suppliers undertake to take the utmost care to preserve the image and reputation of RB EUROPE Group in their professional performance, through a proper and correct use of them both by their employees and by any subcontractors.

This Code applies to all suppliers of RB EUROPE Group and to all subcontracted suppliers. In the event of subcontracting by the supplier, the supplier shall be responsible for ensuring that its subcontracted suppliers also carry out their activities in compliance with all the principles as set out in this document.

## **5. MONITORING AND AUDITING**

Suppliers shall authorise RB EUROPE or third parties designated by RB EUROPE to monitor proper compliance with this Code of Conduct. To this end, they shall provide the means and access to facilities and documentation necessary to ensure such verification.

## **6. ETHICS CHANNEL**

RB EUROPE Group provides its suppliers with an ethical channel to report any non-compliance with this document, its related policies and/or applicable regulations and also to clarify doubts about the Company's internal rules. This channel can be accessed through the following link:

<https://rbeurope-canaletico.appcore.es/>

## **7. VERSION CONTROL**

Version	Summary	Drafted by	Approved by	Date
1	Creation	Ethics and Compliance Department	-	-
2	Revision and update	Ethics and Compliance Department	Board of Directors of Restaurant Brands EUROPE, S.A.U.	25/05/2022
3	Update	Ethics and Compliance Department	Board of Directors of Restaurant Brands EUROPE, S.A.U.	18/04/2023
4	Update	Ethics and Compliance Department	Board of Directors of Restaurant Brands Europe, S.A.U.	25/02/2025



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europe**

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**CONTACT:**

**Restaurant Brands Europe Group**

Avenida de Europa 26, Edificio Ática 7,  
C.P. 28224 - Pozuelo de Alarcón, Madrid (Spain)  
Tel.: (+34) 91 450 16 26

**Ethics Channel:** <https://rbeurope-canaletico.appcore.es/>

**Corporate Website:** <https://www.rbeurope.com/>