



BLOOMIN' BRANDS, INC.

SUPPLIER CODE OF CONDUCT

Purpose and Scope

Bloomin' Brands, Inc. (“**BBI**”) and its direct and indirect subsidiaries and affiliates (collectively, the “**Company**”) are strongly committed to conducting business in a lawful and ethical manner, including engaging with suppliers that are committed to the same principles to ensure a long-term, sustainable, and successful relationship for all parties.

This Supplier Code of Conduct (the “**Supplier Code**”) applies to the Company’s Suppliers and Supplier Affiliates.

To ensure these responsible sourcing standards are cascaded throughout Bloomin’ Brands supply chain, Suppliers are expected to hold their suppliers and contractors to the standards and practices covered here. The Company reserves the right to decline to deal with Suppliers who do not comply with this Supplier Code. Violations of, or non-cooperation with the Company in its enforcement of the Supplier Code, may lead to corrective action or termination of the Supplier relationship.

Definitions

Laws: All national, state, or local laws, regulations, executive orders, rules, ordinances.

Supplier: Any person, firm, corporation, or other entity who provides goods and/or services to the Company or performs a contract for or with the Company other than as employees in exchange for payment from the Company and/or its designated third-party agent(s).

Supplier Affiliate(s): Direct and indirect subsidiaries of any Supplier, and its and their owners, officers, directors, agents, and representatives.

Confidential Information: Any information relating to or disclosed by Company, which is designated as, or should be reasonably understood to be, confidential or proprietary to Company, including, but not limited to, information related to Company’s business, sales and performance data, technical processes and formulas, customers, employees, and current and future business and development plans.

Company Trademarks: Any material containing a symbol, trademark, service mark or trade name owned by Company.

Section 1: Business Practices

Suppliers must comply with and ensure that their Supplier Affiliates comply with this Supplier Code.

- 1.1 **Compliance:** Suppliers and Supplier Affiliates must comply with all applicable Laws.. This compliance requirement includes, but is not limited to, all applicable Laws related to employment, human rights, the environment, bribery, and health and safety.

Laws may be in some instances less restrictive than the principles set forth in this Supplier Code. In those situations, Suppliers and Supplier Affiliates are expected to comply with this Supplier Code, even if the conduct would otherwise be legal under applicable Laws. If Laws are more restrictive than this Supplier Code, Suppliers and Supplier Affiliates are expected to comply with applicable Law.

- 1.2 **Confidentiality:** Suppliers and Supplier Affiliates must respect the confidentiality of Confidential Information acquired during their professional relationship with Company and not disclose such information to any third party except with Company written consent or when compelled to disclose such information by valid legal or government action. Suppliers and Supplier Affiliates must not use for personal or business advantage Confidential Information acquired during their business relationship with the Company.
- 1.3 **Responsible Sourcing of Materials:** The Supplier and Supplier Affiliates must exercise due diligence with relevant materials in its supply chains. The Supplier and Supplier Affiliates shall develop due diligence policies and management systems to identify risks and take appropriate steps to mitigate them. Due diligence shall be conducted to the materials processing level to determine whether relevant materials originate from regions with risks. These risks include those associated with conflict, child labor, forced labor and human trafficking, human rights violations (such as sexual violence), or other reasonably objective risk activities, including health and safety risks and negative environmental impacts.
- 1.4 **Financial Management:** Suppliers and Supplier Affiliates must not have any false or inaccurate entries in their accounting books or records related to the Company for any reason. Supplier's and Supplier's Affiliates business records must be retained in accordance with all applicable Laws.
- 1.5 **Improper Payments:** Suppliers and Supplier Affiliates must not directly or indirectly offer or make bribes, kickbacks, or improper payments of any kind to the Company, or government official. Suppliers and Supplier Affiliates are required to comply with U.S. Foreign Corrupt Practices Act as well as all other applicable anti-bribery or corruption Laws.
- 1.6 **Company Name and Trademarks:** Any news release, public statement or any form of publicity pertaining to Company is prohibited without prior written approval of the Chief Legal Officer of Company which may be withheld or revoked in Company's sole discretion. Supplier and Supplier Affiliates may not use, in or on any product label, advertisement, promotional materials, website or the like, in any manner whatsoever, and form or the Company's name or Company Trademarks without the prior written consent of the Chief Legal Officer of the Company. (See Section 2.3 Reporting) No ownership or license rights to Company Trademarks are granted to Supplier or and Supplier Affiliate hereunder.
- 1.7 **Gifts:** Suppliers and Supplier Affiliates must not seek, accept, offer, or give payments, fees, loans, services, or gifts from or to Company as a condition or result of doing business with the Company, or if the intended purpose is to influence a business decision or if acceptance would have the appearance of having influenced a business decision. For the purposes of this Supplier Code, gifts include providing goods and/or services at prices less than the prices normally charged to the public. All such gifts are prohibited. Supplier and Supplier Affiliates may provide nominal gifts to the Company that meet all the following criteria:

A. total market value of all gifts to the Company may not exceed USD 150 per year;

Approved: October 1, 2013; amended Nov 20, 2020 and January 11, 2024

Approved by: Policy and Procedure Sub-Committee

Policy #SC04

- B. the gift does not violate the Supplier's or Supplier Affiliate's internal policy;
- C. the gift does not consist of cash or cash equivalents (e.g., stocks, or other forms of marketable securities, or gift cards)
- D. the gift does not violate any Law, or this Supplier Code

It is improper for Company to request or demand gifts of any kind from any Supplier or Supplier Affiliate and any such requests or demands must be reported as directed in Section 2.3 (Reporting) below.

- 1.8 **Conflict of Interest and Full Disclosure:** Suppliers and Supplier Affiliates must make immediate and full disclosure to the Company's Chief Legal Officer of any relationships of the Supplier or any Supplier Affiliate with any Company officer, director, or employee, or a family member or significant other of any Company officer, director, or employee, or any entity in which any of the foregoing has a financial interest (each a "**Company Related Party**") whether or not such Company Related Party deals directly with the Supplier or Supplier Affiliate. Relationships include, but are not limited to family relationships, personal relationships, financial relationships, relationships as co-investors, partners or shareholders in other businesses or entities, and any other relationship that could result in a Company Related Party having a conflict of interest or an appearance of a conflict of interest in dealing with the Supplier or Supplier Affiliate whether or not the Company Related Party deals directly with the Supplier or Supplier Affiliate on behalf of the Company. Full and fair disclosure requires disclosure of any of the above-described relationships. The Supplier or Supplier Affiliate shall also disclose any employment or managerial position the Supplier or any Supplier Affiliate has with a competitor of the Company. Suppliers and Supplier Affiliates shall not invest, subsequent to the date of adoption of this Supplier Code, in any franchisee of the Company. Suppliers and Supplier Affiliates are required to update this disclosure on an on-going basis and immediately notify the Chief Legal Officer of the Company of the existence of any of the above-described relationships. All required disclosures must be made as directed in Section I.9 (Reporting) below.

All potential and actual conflicts of interest must be reported to the Company as directed in Section 1.9 (Reporting) below so that appropriate action can be taken. Any ownership of or interest in the Supplier's or and Supplier Affiliate's business by government officials or political parties or a Company employee must be reported prior to a Supplier or Supplier Affiliate entering into business relations with Company.

- 1.9 **Reporting:** Suppliers and Supplier Affiliates must work through their own company to resolve internal ethics and compliance issues. Suppliers must promptly and fully make all disclosures required in this Supplier Code, report violations of this Supplier Code and report any unethical or illegal behavior by Company to the Company Chief Legal Officer as follows:

Bloomin' Brands, Inc.

2202 N. West Shore Blvd., Suite 500

Tampa, FL 33607

If you do not believe it appropriate or are not comfortable approaching the Company Chief Legal Officer about your concerns or complaints, you may report through the Company's Ethics and Compliance Hotline, or web portal as follows:

Ethics and Compliance Hotline: **(800) 806-1133**

Ethics and Compliance Portal: bloominbrands.ethicspoint.com

Approved: October 1, 2013; amended Nov 20, 2020 and January 11, 2024

Approved by: Policy and Procedure Sub-Committee

Policy #SC04

Section 2: Human Rights and Labor Practice

The Company believes all workers in its supply chain deserve a fair and ethical workplace. Workers must be treated with dignity and respect. At a minimum, Suppliers and Supplier Affiliates are required to comply with all applicable Laws regarding working conditions and labor standards. Where applicable Laws are less stringent than the International Labor Organization's ("ILO") Fundamental Principles, the ILO's Fundamental Principles will apply.

- 2.1 **No Forced Labor:** The Supplier and Supplier Affiliates must ensure that all work is voluntary. The Supplier and Supplier Affiliates must not use any enslaved, involuntary, forced, prison or debt bondage labor of any kind. The Supplier and Supplier Affiliates must not be involved in human trafficking activity or any activity that promotes modern slavery. The Supplier must not use any corporal punishment, physical or psychological abuse, or threats of violence or coercion to secure or keep its employees.
- 2.2 **No Child Labor:** The Supplier and Supplier Affiliates must comply with all applicable Laws preventing child labor. Only workers who meet the minimum legal age requirements of the applicable country shall be permitted to work. If there is any doubt about the minimum employment age, the ILO's Minimum Age Convention, 1973 (No. 138) which states that at a minimum, children should be at least 15 years of age or have completed compulsory education, should be applied. Supplier and all Supplier Affiliates shall implement and maintain a reliable system to verify the age eligibility of all workers.
- 2.3 **Wages, Benefits and Working Hours:** The Supplier and Supplier Affiliates must adhere to all applicable Laws regarding working hours, wages, social security payments and overtime payments. Workers must be paid at least the minimum legal wage or better. Where there is no legislated minimum wage, the Supplier and Supplier Affiliates must be able to demonstrate that an employee's wages meet industry norms. Wages shall be paid promptly and paid in full subject to legal deductions.

Supplier and Supplier Affiliates will limit working hours and overtime to levels that are humane and safe and will ensure productive working conditions. Workers shall receive annual leave and public holidays in accordance with Law.
- 2.4 **Discrimination and Harassment:** Supplier and Supplier Affiliates will comply with all applicable Laws prohibiting discrimination or harassment against any person on the basis of their race, color, sex, sexual orientation or preference, religion, national origin, age, genetics, military or veteran status or any other protected category or status under the Law.
- 2.5 **Immigration Compliance:** Suppliers and Supplier Affiliates will comply with applicable Laws related to the eligibility of its employees to work in the United States. Such compliance includes verifying the employment status of employees through a properly completed Form 1-9 and through E-Verify as applicable, or for workers outside the United States, a reliable system to verify the legal work status of all workers.

Approved: October 1, 2013; amended Nov 20, 2020 and January 11, 2024

Approved by: Policy and Procedure Sub-Committee

Policy #SC04

Section 3: Health and Safety

Supplier and Supplier Affiliates must provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Supplier employees must be provided the right to refuse unsafe work and to report unhealthy working conditions.

- 3.1 **Management Commitment:** Supplier and Supplier Affiliates must set a policy and reasonable objectives for health and safety of individuals. A competent and qualified health and safety responsible person will be appointed and will report to an appropriate level of the Supplier's organization.
- 3.2 **Health and Safety Permits:** Supplier and Supplier Affiliates must obtain, keep current, and comply with all required permits and Laws regarding health, safety, hygiene, sanitation, fire safety, electrical, mechanical, and structural safety. Supplier and Supplier Affiliates must have a structured health and safety management system in place.
- 3.3 **Safe Working Environment:** Supplier and Supplier Affiliates must routinely assess its work environment for health and safety hazards and eliminate, control, or mitigate these identified risks. Supplier and Supplier Affiliates must provide workers with appropriate workplace health and safety training in their primary language. Health and safety-related information must be made accessible by Supplier and Supplier Affiliates to its employees at the work site or location. Supplier and Supplier Affiliates must issue its employees with the necessary personal protective equipment, at no cost, to protect their health, safety, and welfare.

Supplier and Supplier Affiliates must monitor its working environments to assess the exposure of workers and visitors to occupational health hazards, including but not limited to chemical exposure, dust, noise, and fumes.

- 3.4 **Investigation:** Supplier and Supplier Affiliates must put in place processes to record and investigate accidents, near misses and first-aid events. This investigation will include a root cause analysis and preventative and corrective actions to prevent reoccurrence. Supplier and Supplier Affiliates is prohibited from taking punitive measures against its employees for reporting or having accidents, near misses or first-aid events, unless the employee is shown to be willfully negligent.

Section 4: Environmental

Supplier and Supplier Affiliates must comply with all applicable environmental Laws, in relation to its business and operations.

- 4.1 **Environmental Permits and Reporting:** Supplier and Supplier Affiliates must ensure compliance with industry environmental, agricultural, and animal welfare standards applicable to their respective industry.
- 4.2 **Management of Environmental Impact:** Supplier and Supplier Affiliates is responsible for managing, measuring, and minimizing the environmental impact of its facilities. Specific focus areas include air emissions, waste reduction, recovery and management, water use and disposal, and greenhouse gas emissions.
- 4.3 **Hazardous Waste Management:** Supplier and Supplier Affiliates must effectively identify and manage the safe handling, movement, storage, and disposal of chemicals and other substances

Approved: October 1, 2013; amended Nov 20, 2020 and January 11, 2024

Approved by: Policy and Procedure Sub-Committee

Policy #SC04

that threaten the environment, including providing workers with appropriate training on the safe handling and disposal of hazardous substances.

- 4.4 **Monitoring and Measurement:** Supplier and Supplier Affiliates is expected to develop appropriate environmental management systems that recognize the environmental impacts of its specific business processes and monitor and report performance against improvement targets.

Section 5: Audits; Modifications

- 5.1 Company may conduct audits, inspections, and evaluations of Suppliers, Supplier Affiliates and their business practices, records, and facilities. Suppliers and Supplier Affiliates must preserve all information necessary to demonstrate and document compliance with this Supplier Code.
- 5.2 Company reserves the right to supplement or modify this Supplier Code at any time and request that Suppliers accept and agree to its requirements.

Related Policies

Gift & Entertainment Policy (LG20)