

A large graphic consisting of three overlapping, semi-transparent orange shapes that form a stylized arrow pointing to the right. The top shape is a dark orange, the middle is a medium orange, and the bottom is a lighter orange. The text "Suppliers Code of Conduct" is centered in white over the middle shape.

Suppliers Code of Conduct

January 2025

Introduction

Having signed up to the UN's Global Compact, Etex is committed to work towards sustainable development goals. Our suppliers are vital partners in supporting the entire supply chain and we care about the way they do business. Therefore, Etex decided to implement a Suppliers Code of Conduct (the "Code"). The Code is not only addressing the issues covered by the UN Global Compact in the areas of human rights, labour, environment, and anti-corruption, but also more generally the key principles in Etex's own Code of Conduct.

As a condition of doing business with Etex we expect all suppliers to operate in a manner that meets or exceeds our minimum requirements.

Reaching some of the standards from this Code is a dynamic rather than static process. To further enhance and accelerate its sustainable procurement efforts, Etex has developed a Sustainable Procurement Policy and Etex encourages suppliers to continually improve their processes accordingly and to have established clear goals to comply with the standard set forth in this Code. Suppliers should also actively review, monitor and modify their management processes and business operations to align with this Code. **Should a supplier not be in a position to confirm its compliance with any of the Code's standards, it should inform Etex Group Purchasing for further assessment.**

1. Etex's suppliers

Etex selects its suppliers using objective criteria, including but not limited to products, price, services, and ethical/responsible business conduct. Suppliers should be quality-driven, innovative, efficient and must be law-abiding. **All Etex suppliers must adhere to good ethical practices and internationally recognised standards of responsible business conduct and fully commit to the recommendations contained in this Code.** Failure to do so may lead to the termination of the contract between the supplier and Etex.

Etex expects its suppliers to continuously improve social and environmental performance and strive to meet or exceed international and industry best practices. Etex encourages Suppliers to work with their own suppliers and subcontractors to ensure that they also strive to meet the standards of this Code.

2. Suppliers' commitment to Safety, Ethics, Law and Regulations

Etex's suppliers must behave safely and ethically at all times, and they must comply with all laws and regulations, industry standards and all other relevant legal directives applicable in the jurisdictions in which they operate.

Where differences arise between the provisions of any local and national law and the principles set out in this Code, the stricter standard or provision offering the greater protection for employees and communities, should be applied.

3. Human Rights, Labour and Workplace Conditions

Etex does not tolerate human rights violations and support the relevant national laws and the applicable provisions of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, the International Covenant on Economic and Social Rights as well as the principles concerning fundamental rights in the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work. Etex requires all of its Suppliers to treat their workers with trust, dignity, respect, fairness and equity.

As a minimum, Etex expects its suppliers to respect the following fundamental concepts:

- **No child labour and respecting minimum age level:** The use of child labour is strictly prohibited.
- **No forced or compulsory labour** and ensuring that forced, compulsory labour, or any form of slavery does not exist in their organisations. All employment must be voluntary.
- **Employment standards:** Suppliers must support the application of fair and just remuneration. Suppliers should observe standards of employment and industrial relations no less favourable than those of similar employers in the country when it comes to compensation and working time arrangements.
- **Freedom of association and right to collective bargaining:** Suppliers must recognise the freedom of association and collective bargaining within the applicable legal framework.
- **No harassment:** Suppliers are expected to have committed to a workplace free from harassment and abuse. Suppliers are expected not to threaten workers with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual, or psychological.
- **Workplace diversity:** Suppliers should uphold the elimination of discrimination in respect of employment and occupation. In doing so, Suppliers should encourage the diversity of their workforce. Decisions relating to hiring, job assignment, discharge, pay and benefits, promotion, transfer and relocation, termination, training and retirement are not influenced by factors such as race, colour, religion, political opinion, gender, national or social origin, age, pregnancy, marital status, sexual preference, HIV status or disability (unless government policies promoting greater equality of opportunity or job characteristics require otherwise)

4. Occupational Health & Safety

Suppliers must provide a safe and healthy workplace for their employees and contractors. Suppliers must be compliant with local and national laws and regulations on occupational work health and safety, and have the required permits, licenses and permissions granted by local and national authorities.

Suppliers must have documented health and safety policies and procedures in place together with an appropriate safety infrastructure and equipment. Suppliers are expected to commit to putting comprehensive safety standards, guidelines, systems and procedures based on best practices into place that may go beyond simple compliance with laws.

When on Etex sites, Suppliers must comply fully with all applicable Etex policies and directives. Consuming alcohol or illegal substances is strictly prohibited on all Etex premises.

5. Compliance and Ethics

Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, or unlawful activities. Suppliers should have appropriate policies and procedures in place to foster a culture of fairness, compliant and ethical behaviour, in particular to ensure compliance with applicable laws related to the below:

- **Preventing conflict of interests:** suppliers shall avoid any situations where a conflict of interest between the supplier and Etex may exist including interactions with an Etex employee that could create a conflict of interest with Etex employee's duty to act in the best interest of Etex. Suppliers shall disclose to Etex any potential or existing conflict of interest situation in its relationship with Etex.
- **Anti-bribery and -corruption:** Etex has a zero-tolerance approach to bribery and corruption. Suppliers must ensure that their employees do not offer, promise or give Etex employees any benefits aimed at obtaining an order or other preferential treatment in the context of business transactions. In the same way suppliers shall not request any inappropriate benefits from Etex employees. This obligation extends to all activities and are not limited to cases involving public officials. Offering or accepting occasional small gifts or hospitality (any form of entertainment) may be acceptable behaviour but should never be used to influence a decision which could be perceived as an act of bribery or corruption or lead to a conflict of interest.
- **Compliance with competition law:** Etex expects its suppliers to compete in a fair and open market and to comply with applicable competition laws. Suppliers must not engage in any anti-competitive conduct or take improper advantage of a possible market dominant position.
- **Fraud:** Suppliers should be committed to preventing all types of fraud by promoting a culture of integrity at all levels within its organization.
- **Compliance with anti-money laundering rules and sanctions:** Suppliers shall comply with all applicable laws and regulations aimed at preventing money laundering and economic and trade sanctions. Suppliers shall not lead Etex to be in violation with these rules.
- **Confidential information and personal data:** Suppliers must treat business correspondence with Etex confidentially. Confidential information, any protection-worthy data and the intellectual property rights of Etex must be properly safeguarded by suppliers. Suppliers must also comply with their obligations pursuant to applicable data protection laws.
- **Reporting line(s):** Suppliers must provide protection to their employees to report any suspected violation of their own code of business conduct (or equivalent).

6. Sustainability / Environment

Etex recognises the need to protect the environment, properly manage resources and conduct its activities in a manner that contributes to the wider goal of sustainable development. Etex is committed to continual improvement in its environmental performance and resources management through the setting of objectives and targets aligned with our environmental strategic objectives. This is an integral part of Etex's commitment to Corporate Social Responsibility.

- **Reduced environmental impact:** Etex expects its suppliers to increase environmental sustainability by
 - optimizing their consumption of natural resources including energy and water, and prefer renewable resources when the choice exists;
 - implementing and demonstrating sound measures to prevent pollution and minimize generation of solid waste, wastewater, and air emissions;
 - avoiding the use of drinking water for production process and enhancing water stewardship;
 - whenever feasible, implementing circularity solutions: waste, energy and water recycling/reuse at plant level or beyond plant level.
- **Environmental management:** We expect our suppliers to comply with all laws and regulations relating to environmental performance, management, and reporting.
 - Suppliers must have a written environmental policy and an environmental management system to measure and manage the environmental aspects of their activity and to avoid or minimise any adverse environmental impacts.
 - In the case of a serious environmental risk, Etex expects its suppliers to take corrective measures in a timely and responsible way.
 - Our Suppliers should also have an emergency response plan helping them cope with any environmental accident occurring due to their activities.
- **Dangerous materials:** Suppliers of materials containing hazardous substances must label and provide safety data sheet (SDS) to inform on the hazards and safe recommendations for handling, transport, storage and disposal. The suppliers must comply with all chemical legislations and regulations, including REACH, of the jurisdictions where they supply.

7. Compliance with this Code and reporting requirements

Suppliers with knowledge of, or reason to suspect, a violation to this Code or of Etex's code of business conduct (The Etex Way), should immediately report it through the [SpeakUp Line](#) with no fear of retaliation. Good faith reports filed through the SpeakUp Line will be managed by Etex in line with its SpeakUp Policy. The SpeakUp Line is operated by an independent 3rd party allowing web intake and is designed to preserve confidentiality and, if need be, the full anonymity of the person reporting a concern.



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