

**SIBELCO**



# **SUPPLIER CODE OF CONDUCT**

*The Code is an important component in our Supplier selection and evaluation process, compliance with the Code is a prerequisite for working with Sibelco*

# SUPPLIER CODE OF CONDUCT

The Supplier Code of Conduct is the foundation of our relationship with our Suppliers - creating a mutual understanding of our company's core values and beliefs. The purpose of the Supplier Code of Conduct is to outline our expectations according to law, plus our beliefs - ensuring consistent compliance from all of our Suppliers, including their subcontractors, who provide goods or services to Sibelco.

- The Supplier Code of Conduct was created to communicate our commitment to conduct our activities sustainably and responsibly and our expectations of our suppliers.
- This code applies to any company who provides supplies or services to SIBELCO (« Supplier »). This code is not exhaustive; Suppliers are required to use their own discretion to ensure compliance with unaddressed topics.
- We believe a strong relationship with our Suppliers is key to ensuring our success.

# Overview

## Commitment to Human Rights

We expect all Suppliers to commit to human rights and honour this highest standard when applicable laws and regulations differ.

***Our Supplier Code of Conduct is rooted in a deep commitment to human rights.***

## Legal & Regulatory Compliance

We require our Suppliers to fully comply with all laws, rules, and regulations applicable to their country of operation and Supplier's location, where SIBELCO is located.

***Applicable Laws and Regulations are all local, state, federal, and international laws and regulations, including but not limited to the labour and employment, health and safety, and environmental laws and regulations of the Supplier location.***

## Health & Safety

We recognise the fundamental importance of committing to ensuring a safe and hazard-free environment for all of our employees.

***We require our Suppliers to ascertain the highest dedication to Health & Safety standards.***

## Caring for the Environment

We recognise our responsibility to the environment and seek to operate sustainably.

***Suppliers are expected to apply a continuous improvement approach to enhance their environmental performance and reduce their environmental footprint. Suppliers must follow all applicable laws and regulations regarding environmental practices.***

## Upholding the standards

We expect the highest standard of ethics, integrity, and responsibility in all our operations and endeavours.

***Suppliers are required to be ethical in all aspects of their business, practices, operations, and relationships. We hold all of our Suppliers to the highest ethical standards.***






## Commitment to Human Rights

**Our Supplier Code of Conduct is rooted in a deep commitment to human rights. We expect all Suppliers to commit to human rights and honor this highest standard when applicable laws and regulations differ.**


### Prohibition of Child Labour

All employees must be of at least legal age established by working age laws of their country of operation. Suppliers must create and maintain official and verifiable documentation of each of its employees' ages. If child labour is found, the Supplier must take action in the best interest of the child.

 *"Child" means any person who is under 16 years of age, under the age of completion of compulsory education, or under the minimum age for employment in the country, whichever is the higher. Workers under the age of 18 are not allowed to perform any work that could endanger their health or safety, including night shifts and overtime.*

### Prohibition of Forced Labour and modern Slavery


All work must be completed on a voluntary basis only.

 *Suppliers may not use and/or tolerate the use of any illegal form of forced labour,*

*including trafficked, bonded, slave, indentured, or prison labour.*


### Prohibition of Discrimination

Suppliers may not engage in or tolerate any discriminatory conduct against any person on any basis.

 *Basis including race, religion, gender, disability, nationality, veteran status, union membership, political opinion or any other class protected by law.*


### Diversity, Inclusion and Belonging

Diversity, Inclusion and Belonging is a journey. Sibelco is on that journey and is committed to becoming a truly diverse workplace where every employee can be themselves and bring their unique perspectives to work.

 *Suppliers must demonstrate their commitment to identify, measure, and improve a culture of diversity and inclusion through all aspects of workplace management.*

### Freedom of Association


We firmly believe in the principle of Freedom of Association. We expect our Suppliers to recognise, respect, and protect their employees' lawful rights to freely associate and collectively bargain.

 *Suppliers must recognise, respect, and protect employees' lawful rights to freely associate and collectively bargain in accordance*

*with applicable laws and regulations and without fear of retaliation.*


### Wages, Benefits & Respect Terms of Employment

Suppliers must pay employees in accordance with applicable wage laws, including minimum wages, overtime hours and mandated benefits in any jurisdiction where the Supplier and SIBELCO operate

 *Suppliers are expected to provide their employees with an environment that is respectful of human dignity.*


### Working Hours

Suppliers must comply with all applicable laws and regulations regarding working hours, break periods, and overtime hours in any jurisdiction where the Supplier and SIBELCO operate.

 *Employees must not be expected to work additional hours to earn minimum wage for a day's work.*


### No Harassment

All workers have a right to a workplace free of harassment and abuse.

 *We require our Suppliers to prohibit all types of harassment including, but not limited to physical, verbal, psychological and sexual harassment.*


### No Substance Abuse

Suppliers must create and maintain a workplace free from the illegal use, possession, sale, or distribution of controlled substances.

 *Suppliers shall have policies and procedures in place to ensure that employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications (whether prescription or non-prescription).*

### Immigration

Suppliers must comply with applicable immigration laws and regulations in any jurisdiction where they and SIBELCO operate.

 *Only employ workers with a legal right to work in the relevant location.*

*This note aims to correct a previous error in the **Prohibition of Child Labour** section. The definition of a "child" in this version has been increased from under 15 years of age to under 16 years of age.*




## Legal & Regulatory Compliance

**We require our Suppliers to fully comply with all laws, rules, and regulations applicable to their country of operation and the country in which the SIBELCO operation/affiliate being supplied is located.**


### Anti-Bribery/Anti-corruption

We expect Suppliers to be in full compliance with all applicable foreign and domestic anti-corruption laws.

 *Suppliers may not engage in any kind of bribery or kickbacks, including promising, offering, providing, or authorising anything of value to a government official or political entity to gain an unfair business advantage. Suppliers may not engage in bribery, embezzlement, extortion or other corrupt practices.*


### Conflicts of Interest

Suppliers should avoid even the appearance of conflicts of interest in their cooperation with SIBELCO.

 *Suppliers are required to disclose any conflict of interest to Sibelco as well as known family or other close personal relationships with our employees who may influence their cooperation with SIBELCO.*


### Gifts and Entertainment

Suppliers may not offer or accept anything of value from business partners to obtain unfair business advantages.

 *Any gifts or entertainment must comply with applicable laws and regulations and must not violate SIBELCO's policies on the matter. "Gifts and entertainment" includes anything of value, such as loans, prizes, meals, tickets, or gift certificates.*


### Fair Competition and Antitrust

We require our Suppliers to conduct their business in full compliance with all applicable fair competition and antitrust laws and regulations in the jurisdictions in which they operate.

 *Suppliers must not engage in any activities that could be construed as anti-competitive or monopolistic, such as price fixing, market allocation, bid rigging, or abuse of market power. They should also avoid any actions that could unfairly disadvantage other businesses or distort the marketplace.*


### Trade Sanctions

We require our Suppliers to comply with international trade sanction programs and regulations.

 *This requires conducting careful due diligence before selecting a business partner.*


### Money Laundering

All Suppliers are expected to comply with applicable laws and regulations aiming to prevent unlawful or illicit financial transactions.

 *This requires conducting careful due diligence before selecting a business partner.*


### Disclosure of Information

We expect Suppliers to accurately record and disclose information regarding their business activities, without falsification or misrepresentation, to all appropriate parties and as required by law.

 *Suppliers must not falsify records or misrepresent conditions or practices and shall be transparent in all their dealings with Sibelco.*


### Confidentiality/Privacy

Suppliers may not disclose such information unless given prior written permission by SIBELCO. In order to conduct day-to-day business with SIBELCO, Suppliers may need access to confidential/ private records.

 *Suppliers must ensure this information be protected and remain confidential and abide by all applicable data privacy laws and regulations.*


### Intellectual Property

Suppliers must respect SIBELCO's intellectual property rights, including processes, information, technology, and customer information.

 *Suppliers are required to take all reasonable efforts and necessary precautions to safeguard their knowledge and protect intellectual property rights.*


### Accuracy of Business Records

We are committed to the integrity of our business records and ensuring that our books, records, and financial reporting are accurate and complete.

 *We require Suppliers to maintain up-to-date business and financial books, records, and statements to demonstrate compliance with applicable laws and regulations. Upon SIBELCO's request, these records must be made available.*

### Workplace Standards

Suppliers must commit to establish and ensure a safe working environment for all employees.

 *Suppliers are required to follow all general workplace standards and must comply with all applicable laws and regulations, including those that relate to labour, wages, working hours, discriminatory hiring and employment practices, and health and safety.*




## Health and Safety

**Health and Safety is a paramount concern for our Company, deeply ingrained in our ethos and operations. We expect our Suppliers to mirror this commitment, demonstrating the same level of diligence and adherence to health and safety standards in their activities.**

### Safety Laws

Suppliers must comply with all applicable safety and health laws and regulations in the countries in which they and SIBELCO operate.

 *Suppliers are expected to provide employees with a healthy and safe workplace, including access to clean, safe and reasonable working conditions.*


### Occupational Safety

Suppliers must protect workers from exposure to chemical, biological, and physical hazards, in addition to on-site accidents.

 *Suppliers are expected to identify, evaluate, and manage these occupational health and safety hazards.*

### Emergency Prevention


Suppliers must identify and assess potential emergency situations in the workplace.

 *Suppliers must develop and implement emergency plans and response procedures, including but not limited to fire alarms, fire drills, exit facilitates, fire detection*

*and suppression equipment, and recovery plans to minimise harm to life and property. Suppliers must regularly test emergency preventative methods, such as fire alarms, to ensure that they are in working order.*


### Infectious Disease

Suppliers must develop, implement, and maintain a program to prepare for, prevent, and respond to the potential of an infectious disease outbreak among its employees.

 *Suppliers are expected to provide sufficient personal protection equipment to prevent infectious diseases spreading in the workplace.*


### Incident Management

Suppliers must create and maintain procedures to prevent, manage, track, and report employee safety incidents.

 *Suppliers are expected to implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate employees' return to work.*

### Housing Facilities

Suppliers must meet SIBELCO's standards when providing housing facilities to employees.

 *Suppliers must follow legal requirements for the amount of living space in sleeping quarters, clean toilet facilities, potable water, and sanitary food preparation and eating facilities. Living spaces must be distinct from the factory/production area and separated by gender.*



## Caring for the Environment

**We require our Suppliers to support sustainability initiatives in their daily operations.**


### Sustainability

Suppliers are expected to recognise their responsibility to the environment and seek to operate sustainably.

 *Suppliers are expected to apply a continuous improvement approach to enhance their environmental performance and reduce their environmental footprint. Suppliers must follow all applicable laws and regulations regarding environmental practices.*


### Permits and Reporting

Suppliers must obtain and maintain all required environmental permits.

 *Suppliers must comply with the reporting requirements of applicable permits and regulations.*


### Hazardous Materials

Suppliers are expected to train employees on how to handle hazardous materials.

 *Suppliers must create and maintain systems to ensure the safe handling, movement, storage, disposal, and management of hazardous materials.*


### Wastewater and Solid Waste Emissions

Suppliers must comply with all applicable waste management laws and regulations.

 *Suppliers must monitor, treat, control, manage, and properly dispose of wastewater and solid waste.*


### Air Emissions

Suppliers must identify, manage, reduce, and properly dispose of air emissions that pose a hazard to the environment.

 *Suppliers are expected to conduct routine monitoring of the performance of its air emission control systems.*


### Pollution Prevention

Suppliers must strive to reduce consumption of resources, including raw materials, energy and water.

 *Suppliers are expected to implement improvement plans for waste reduction, recycling, and energy conservation policies and seek ways to use cleaner sources of energy.*

### Conflict Minerals

Suppliers and their subcontractors must not use conflict minerals, whose obtainment is linked to human rights violations.

 *Suppliers must meet the conflict reporting requirements as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission.*




## Upholding the Standards

**We expect our Suppliers to uphold the highest standards in all aspects of their operations reflecting their commitment to integrity and excellence.**


### Risk Assessment and Management

We expect Suppliers to develop and maintain processes that identify risks in all areas addressed in this Code; assess the significance of each risk; and implement appropriate procedures and controls to minimise the identified risks.

 *Suppliers should have proactive approach to risk identification and management.*


### Audits and Inspection

Sibelco can audit Suppliers at any time to ensure compliance with the standards in this Supplier Code of Conduct.

 *Factories can be inspected as a part of this process. If permission to conduct an audit is denied, consequences up to or including termination of our agreement may occur.*


### Verification

We require Suppliers to maintain documentation to verify compliance with the Supplier Code of Conduct and applicable laws and regulations.

 *Suppliers should have robust systems in place for record-keeping and should follow best practices for document retention.*


### Non-Compliance

Failure to adhere to this Supplier Code of Conduct may lead to penalties. We reserve the right to terminate business with a Supplier who fails to adhere to the Supplier Code of Conduct.

 *If it is determined that a Supplier does not adhere to the Code, they must correct their actions to ensure compliance with the requirements outlined in this document.*

### Speaking Up / Whistleblower Protection and Anonymous Complaints

Suppliers are required to implement and maintain an anonymous complaint system for employees and third parties to report complaints.

 *Suppliers must protect whistleblower confidentiality and prohibit retaliation.*

## Definitions

**Employee:** All current and former workers of SIBELCO, a Supplier, or subcontractors.

**Supplier:** An institution, including their subcontractors, who provides goods or services to SIBELCO.

**SIBELCO:** Applicable Laws and Regulations. All local, state, federal, and international laws and regulations, including but not limited to the labour and employment, health and safety, and environmental laws and regulations of the [region where Supplier operates].

# How can you make a report?

***Raising a concern should be as easy as possible. Choose the reporting option you are most comfortable with and know your confidentiality will always be protected.***



### Our Reportline

You can make use of our independent and confidential reporting service which is available 24 hours a day, 7 days a week. To voice your concerns please click on the [link](#).

### Over the phone

If you would like to raise your concern over the phone, you can find your local phone number by selecting your country in the Reportline home page. This is a safe and secure call center run by the external provider EQS Group and is dedicated to receiving whistleblowing disclosures on a global level. You can rest assured that any information you provide is handled confidentially and securely. The phone numbers can be used 24 hours a day, 365 days a year.

### By registered mail

You can also make a report by registered mail addressed to the Chief Legal Officer at: SCR-Sibelco NV, Plantin en Moretuslei 1A, 2018 Antwerp (Belgium).

### To external competent authorities

While the Reportline is our preferred internal channel, you can also make a report directly to external competent authorities if you reasonably believe there is an imminent danger to the public interest.

In some circumstances the law will protect you if you report your concerns to external competent authorities or raise the matter in the media. However, we strongly encourage you to seek advice before reporting a concern to anyone external.