

Supplier Code of Conduct



About this Code

Purpose

In accordance with our purpose of *Material Solutions Advancing Life*, the Sibelco Supplier Code of Conduct (the "Code") is an extension of the Sibelco Code of Sustainable Conduct which represents our commitment to conduct our activities sustainably and responsibly.

Sibelco expects all its suppliers and subcontractors to share, respect and adhere to the 4 non-negotiable principles (the "Principles") expressed in this Code and expect them to replicate these Principles further down the supply chain. The Code comprises an important component in our Supplier selection and evaluation process and compliance to the Principles are a prerequisite for working with Sibelco

Scope

The 4 Principles of the Code set forth requirements for the Supplier with whom Sibelco does business, including their parent, subsidiary or affiliate entities. It is the Supplier's responsibility to disseminate, educate and exercise diligence in verifying compliance of this Code to its employees, agents and sub tier suppliers when relevant.



Material solutions advancing life



The 4 pillars of the code

1. Health, Safety and Quality

A safe and healthy workplace:

Comply with the applicable laws and regulations on *occupational health and safety* in the respective countries where you operate.

Process safety:

Comply with the applicable laws, regulations and safety standards on *managing and maintaining production processes* in the respective countries where you operate.

Product safety:

Comply with the applicable laws and regulations on **product safety** (including labelling and product-handling requirements) in the respective countries where you operate. Suppliers shall provide the applicable documentation containing all safety-relevant information (e.g. product information, safety data sheets, etc.).

Quality requirements:

Provide high-quality, safe and effective goods and services in compliance with the applicable laws, regulations, quality standards or contractually agreed quality requirements and standards in the respective countries where you operate.

2. Human rights and labour standards

Wages & working hours:

Comply with applicable minimum wage and working hours' standards, laws and regulations in the respective countries where you operate.

Prohibition of discrimination:

Equal and fair treatment of all employees by providing a work environment that prohibits all forms of illegal discrimination.

Prohibition of forced labour:

Prohibit any kind of forced labour, including forced prison labour, indentured labour, bonded labour, slave labour or any form of human trafficking, physical punishment or abuse in accordance with the applicable laws and regulations in the countries where you operate.

Prohibition of child labour:

Comply with minimum age requirements prescribed by applicable laws and regulations in the countries where you operate.

3. Legal compliance and ethical business practices

Legal compliance:

comply with all *applicable laws, regulations, contractual agreements and internationally recognized standards* including, but not restricted to: the prohibition of corruption and bribery, conflict of interest, competition and antitrust, confidentiality and intellectual property, international trade compliance, licensing and permits, tax, data protection and privacy.

Ethical business practices:

uphold the highest **ethical business standards** by conducting their business in a sustainable and responsible manner and act with integrity in accordance with this Code. This also includes the duty to report any observed breach of the Code.

4. Environmental protection

Comply with all applicable laws and regulations and standards relating to the *protection and preservation of the environment.*



Application in contracts and ordering

Acknowledgement, acceptance and adherence to the Code is a *prerequisite* for every commitment Sibelco enters into with our Suppliers.

The Code, or its adherence thereto do not create any beneficiary rights for the Supplier. The Principles of the Code are in addition to, and not in lieu of provisions of any commitment between Sibelco and its Suppliers.

Monitoring standards

Sibelco reserves the right to verify compliance to the Code as follows:

- Self-assessment: Sibelco may ask Suppliers to complete a self-assessment to evaluate their compliance.
- **Audits:** Supplier shall grant Sibelco the right to audit (quality, security, compliance etc.). These can either be conducted by Sibelco or an authorized third party acting on behalf of Sibelco.
- **Third-Party Assessments:** Sibelco may solicit desktop information from a third party, e.g. a data provider, on the Suppliers' compliance and performance regarding these Principles.
- **Certifications/Statements:** Sibelco may ask Suppliers for a certification or statement confirming compliance with these Principles.

Compliance

Sibelco recognizes that reaching the Principles established in this Code is a dynamic process and encourages Suppliers to continuously improve. If a Supplier is in breach of these Principles and cannot agree on an improvement plan or fails to implement it, Sibelco reserves the right to revaluate the continuation of the business with Supplier.

Suppliers (and in turn their supply chain) must immediately report any behaviour which is not compliant with this Code or with the applicable laws or regulations by using the ethical helpline <u>(e-mail: ethicalhelpline@sibelco.com)</u>.

Contact

Suppliers can get in touch with their Procurement or Supply Chain point of contact at Sibelco.