

Supplier Code of Conduct



Contents

Introduction	3
General Expectations	3
Environmental Stewardship	3
Climate change	3
Circularity	3
Protection of the natural world	3
Ethical Employment Practices	3
Human Rights	3
Modern Slavery	4
Working Hours & Environment	4
Business Integrity	4
Anti-Bribery and Corruption (“ABC”)	4
Health and Safety	4
Competition Law Compliance	4
Personal Data Protection	4
Supplier Human Rights and Environmental Due Diligence (SHREDD)	4
Speak Out	4
Terms and Conditions	5
Conclusion	5
Document Control	5

Supplier Code of Conduct

Introduction

Kingspan Group plc and its affiliates (“Kingspan”) are committed to conducting their business activities with integrity, and in a responsible and ethical manner as outlined in the Kingspan Group ‘Code of Conduct’.

This Supplier Code of Conduct (SCoC) applies to all organisations that provide goods or services to Kingspan (a “Supplier” or “Suppliers”) including Suppliers’ officers and employees.

The SCoC sets out Kingspan’s expectations of Suppliers, generally in terms of business practices, and specifically with respect to:

- Environmental Stewardship;
- Ethical Employment Practices;
- Business Integrity.

General Expectations

Where the expectations of this SCoC exceed the minimum standards prescribed in the legislation applicable to a Supplier, the Supplier should adhere to the SCoC requirements in addition to the applicable legislation.

Suppliers are expected to maintain appropriate processes and policies in relation to this SCoC and communicate to relevant responsible person as appropriate and, if requested, be able to evidence in writing adherence to the expectations contained herein.

If requested by Kingspan, Suppliers are expected to report progress on the implementation of this SCoC by describing actions taken and detailing future planned activity.

Suppliers should seek continuous improvement in the way the company produces and delivers its products and services and manages its supply chain relationships.

Environmental Stewardship

At Kingspan, our mission is to help accelerate the transition to a net zero emissions-built environment, with people and planet at its heart.

This mission is driven by our comprehensive global environmental sustainability programme which sets ambitious targets across four key focus areas: carbon, energy, circularity and water. Through this programme, we aim to address three major global challenges: climate change, circularity and protection of the natural world.

But to achieve our mission and make progress against our targets, we need our supply chain partners’ support.

At a minimum, we expect all our Suppliers to comply with all applicable local, national and international laws and regulations and do the same for their upstream supply chain.

Climate change:

- We encourage our Suppliers to set GHG emission targets and implement climate change mitigation actions that are in line with the Paris Agreement and compatible with limiting global warming to 1.5°C.
- We expect our Suppliers with operations in high climate impact sectors¹ to identify and assess their material climate-related impacts, risks and opportunities and assess the resilience of their strategy and business model in relation to climate change.

Circularity:

- Suppliers should aim to increase their use of secondary and sustainably sourced, renewable resources and increase resource efficiency.
- We encourage our Suppliers to align their strategies and business models with circular economy principles, including the increase of resource and material efficiency in production and the landfill diversion of waste.

Protection of the natural world:

- We expect our Suppliers to strive to avoid and reduce pollution where possible, including any phase-out of materials or compounds that have material negative impacts.
- Suppliers are expected to protect water and marine resources, respect environmental limits and give increased focus on the local nature of water.
- We expect our Suppliers to protect biodiversity and ecosystems especially in and around biodiversity sensitive areas and mitigate any negative impacts on ecosystem loss and degradation, desertification and soil sealing.

We expect our Suppliers to publicly disclose their strategies, targets, actions and metrics on all relevant environmental topics, at least on an annual basis and, where possible, in accordance with widely recognised reporting standards.

Ethical Employment Practices

Kingspan is committed to the highest standards of business and ethical behaviour including compliance with applicable laws and regulations. Kingspan’s Suppliers are expected to support Kingspan’s commitments particularly regarding:

Human Rights

- Kingspan’s Human Rights Policy and its appendices support our fundamental values and outlines our human rights commitments and expectations of Suppliers to respect potential, current, and past employees.
- Respect and safeguard the people who work on behalf of the Supplier and Kingspan.

¹ High climate impact sectors are those listed in NACE Sections A to H and Section L (as defined in Commission Delegated Regulation (EU) 2022/1288).

Supplier Code of Conduct

Modern Slavery

- Prohibit any use of forced labour in the Supplier's supply chain with all work relating to their operations being completed voluntarily and without slavery, servitude, forced, compulsory or child labour or human trafficking.
- Respect workers right to freedom to terminate their employment with their respective Supplier at any time without penalty, upon giving reasonable notice.

Working Hours & Environment

- Provide their employees with a workplace free of discrimination, harsh and inhumane treatment, sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment.
- Comply with all applicable laws pertaining to working hours.

Business Integrity

Kingspan expects both its employees and those of its Suppliers to transact with integrity and:

- Uphold a high level of honesty, steer clear of conflicts of interest, and ensure business practices are transparent and ethical.
- Adhere to the principles, concepts, and recommendations outlined in the OECD Guidelines for Multinational Enterprises, where relevant.
- Act impartially and objectively in all their purchasing activities and to keep written records where appropriate to demonstrate that their actions have been fair and above reproach.
- Ensure products and services are produced and delivered in line with all laws, local regulations and best industry standards and practices.
- Adopt best practice, when issuing competitive tenders or Supplier quotes, judging bids on the merits of their competitive offerings and total life cycle cost.
- Abide by all pertinent laws and regulations, including but not limited to:

Anti-Bribery and Corruption ("ABC")

Kingspan does not tolerate bribery and corruption and expects its Suppliers uphold these standards:

- Prohibit their employees from engaging in any form of bribery.
- Maintain policies to prevent such activities.
- Avoid facilitation payments and include appropriate anti-bribery clauses in their contracts.

Health and Safety

- Adhere to health & safety legislation and work to continually improve Health & Safety performance.
- Protect their employees from any workplace hazards and physically demanding tasks in the workplace as well as from risks associated with any infrastructures used by their employees.

Competition Law Compliance

- Kingspan is dedicated to conducting business in accordance with all relevant competition laws and at all times fostering a culture of competition law compliance in accordance with our Competition Law Compliance Policy and expects the same of Suppliers.

Personal Data Protection

- Expects that any Supplier processing personal data are engaged on appropriate terms.
- Expects Suppliers to ensure the security of personal data, preventing unauthorised disclosure or breaches.

Supplier Human Rights and Environmental Due Diligence (SHREDD)

- Suppliers are expected to adhere to the standards and expectations of ethical behaviour, environmental sustainability, respect for human rights and responsible business conduct as set out in this SCoC.
- Suppliers are expected to fully cooperate with our 'Supplier Human Rights & Environmental Due Diligence' (SHREDD) procedures aligning with international guidelines such as the OECD Guidance for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

The intensity of engagement with Suppliers through SHREDD will depend on inherent and perceived risk factors, such as human rights and environmental risk, country and industry risk, spend level and business criticality. High-risk Suppliers are subject to increased scrutiny and more thorough review including but not limited to comprehensive assessments, audits and corrective action plans.

Speak Out

Suppliers are encouraged to highlight to Kingspan any areas of legal or ethical concern so that both organisations can have a constructive dialogue about resolving any gaps and deficiencies.

Kingspan is committed to conducting its business activities to the highest standards of integrity. In support of this objective, Kingspan maintains a confidential independent service for raising concerns and strongly encourages raising concerns through this service should the conduct of Kingspan or its employees fall short of the standards expected.

More information can be found on the Kingspan website: <https://www.kingspangroup.com/en/about/culture/code-of-conduct/confidential-independent-service/>

Supplier Code of Conduct

Terms and Conditions

Kingspan retains the authority to:

- End a current contract with a Supplier if there is any breach of this Supplier Code of Conduct or participation in our SHREDD process.
- End a current contract if a Supplier refuses to engage in a remediation plan when requested.
- Exclude Suppliers from future tendering processes if they do not show compliance with our procurement standards or relevant laws.

Kingspan will work to integrate the principles as contained in this SCoC into all current and future Supplier contracts, requests for information and tender documents.

Conclusion

Kingspan seeks to build and maintain long-term relationships with key Suppliers and contractors to ensure that they are aligned to the same standards as Kingspan, to address strategic global issues, emerging trends and ultimately our customer needs. We promote our Supplier Code of Conduct across Kingspan globally to ensure our expectations of Suppliers are clear in terms of business practices, and specifically with respect to: Business Integrity, Ethical Employment Practices and Environmental Responsibility.

Document Control

Author

Position	Contact No.
Group In-House Counsel	+353872380872
Procurement and ESG Senior Manager	+353429698000
Procurement and ESG PMO	+353429698000

Reviewed by:

Version	Issue Date	Position	Review Date
2.0	9th July 2025	Group Company Secretary	5th June 2025

Approvals:

Version	Issue Date	Position	Review Date
2.0	9th July 2025	Board of Directors of Kingspan Group PLC	26th June 2025

Contact Details

Kingspan Group

Dublin Road | Kingscourt
Co Cavan | Ireland | A82 XY31

T: +353 42 969 8000
E: admin@kingspan.com
www.kingspan.com



BE THE DIFFERENCE
THAT MAKES A DIFFERENCE.