

SUPPLIER CODE OF CONDUCT

AXACTOR GROUP

INTRODUCTION

All companies of the Axactor Group (“**Axactor**”) are dedicated to operating and developing its business in a sustainable and responsible manner. Axactor expects any company or person supplying goods or services to Axactor (each a “**Supplier**”) to fully comply with applicable laws and to adhere to internationally recognized environmental, social and corporate governance standards. Axactor also expects its Suppliers to use their best efforts to implement these standards with their agents, suppliers and subcontractors.

Axactor particularly expects its Suppliers to support, embrace and enact the ten principles of the United Nations Global Compact initiative. The Ten Principles of the United Nations Global Compact are derived from the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

For this purpose, Axactor’s parent company, Axactor SE, has issued this code of conduct for all Suppliers to any company of the Axactor Group (the “**Supplier Code of Conduct**”).

Axactor requires its Suppliers to ensure compliance with the standards set out in this Supplier Code of Conduct and to use all reasonable efforts to ensure that their agents, suppliers and subcontractors comply with the same.

ENVIRONMENTAL

- The Supplier supports a precautionary approach to environmental challenges, undertakes initiatives to promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly technologies.
- The Supplier shall strictly comply with all obligations applicable to them in environmental matters and have an effective environmental policy or appropriate procedures in place to ensure compliance with the policy.

SOCIAL

- The Supplier shall develop and carry out its business relationships in accordance with transparent principles of business ethics and management.
- The Supplier supports and respects the protection of internationally proclaimed human rights and have adopted relevant policies and processes to ensure that it neither is nor becomes complicit in any human rights abuses.
- The Supplier processes personal data confidentially and responsibly, respects data privacy and ensures that personal data is effectively protected and used only for legitimate purposes.
- The Supplier upholds the freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced and compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation.
- The Supplier promotes equal opportunities and treatment of employees, irrespective of skin colour, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual identity and orientation, marital status, religious conviction, or age.
- The Supplier refuses to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.
- The Supplier acts in accordance with the applicable statutory and international standards regarding occupational health and safety and provide safe working conditions.
- The Supplier enables employees and other stakeholders to report concerns or potentially unlawful practices at the workplace.

AXACTOR

- The Supplier complies with minimum wages and working hours in accordance with local laws and ensure compensation of a living wage according to local living conditions.

CORPORATE GOVERNANCE

- The Supplier shall at all times comply with, or exceed the requirements of all applicable laws, rules and regulations in the countries in which the Supplier is conducting business.
- The Supplier shall ensure that no entity within the Supplier's group of companies, its management or owners, being legal entities and/or persons and subcontractors appear on any Watch and/or Sanctions lists issued by i.e. the UN, UK, EU and /or the US governmental bodies (collective Sanctions- and Watch lists). Further, the Supplier must inform Axactor immediately if the Supplier becomes aware that any of its companies, management or owners, being legal entities and/or persons or business partners appear on any such Sanctions- and Watch lists.
- The Supplier complies with all applicable laws and regulations relating to anti-bribery and anti-corruption and has in place and enforces policies and procedures adequate to ensure such compliance.
- The Supplier shall comply with Axactor's policies on the prevention of corruption, bribery and extortion, as well as the strictest standards of ethical and moral conduct, international conventions, compliance with applicable laws and ensure that it has established appropriate procedures required for this purpose.
- The Supplier does not tolerate any form of and does not engage directly or indirectly in any form of corruption or bribery and does not grant, offer or promise any gifts, gratuities or other benefits to any Axactor employee, government official or other counterparty in the private sector which may influence decisions, result in an improper advantage or may be conceived as a bribe or facilitation payment.
- The Supplier complies with all applicable national and international competition laws and regulations, and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.
- The Supplier does not directly or indirectly facilitate money laundering or terrorism financing.
- The Supplier respects the intellectual property rights of others.

REPORTING

- Axactor has established a whistleblowing channel as a means of communication for the Suppliers and its agents, suppliers and subcontractors to report any potential breach of this Supplier Code of Conduct: [Axactor Whistleblowing Channel](#).
- The Supplier and its agents, suppliers and subcontractors undertakes to report any potential breach of this Supplier Code of Conduct to Axactor, without delay, using the whistleblowing channel or other appropriate means of communication.

YOUR COMMITMENT

Ensuring the principles of sustainable development in our supply chain is important to us. You may acknowledge your commitment to the standards set out in this Supplier Code of Conduct or demonstrate your commitment and compliance to these same by providing copies of your own code of conduct or company policies that embrace these standards.

The provisions of this Supplier Code of Conduct are without prejudice to the additional conditions and requirements that may be established in the applicable legislation, in the practices and rules of the different jurisdictions where Axactor carries out its activities and in the different contracts with each Supplier, which shall in any case apply.

Axactor reserves the right to conduct audits or assessments to ensure your compliance and will take appropriate steps regarding our relationship with you if there is a reason for concern. Axactor reserves the right to discontinue any relationship for non-adherence to these standards, failure to correct violations, or displaying patterns of non-compliance with the standards of this Supplier Code of Conduct.