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# SUPPLIER CODE OF CONDUCT

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## PREFACE

Styrolution is committed to operating as a responsible corporate citizen and to complying with all relevant local, national and international laws. Our mission is to be a leader in our industry and to continuously improve our performance, but in so doing we will not compromise our environmental, health or safety standards for any reason, including profit or production. We are determined to support the success of our customers in their markets, to give them a competitive edge – not only today but also in the future.

Our mission is supported by our five guiding principles, three of which are directly connected to our sustainability efforts: customer orientation, responsibility as well as valuing and respecting others.

The fundamentals of our Sustainability Program guide our employees and partners:

- We manufacture **responsible products**
- We conduct **responsible operations**
- We are a **responsible employer**
- We act **responsibly towards our stakeholders**

They also form the basis for this Supplier Code of Conduct (“SCoC”), which outlines our expectations for supplier conduct regarding labor practices and human rights, health and safety, environmental protection as well as ethics and fair business practices.

Styrolution’s suppliers play a critically important role in our ability to operate and provide products and services to our customers. That is why we choose suppliers carefully and with the expectation that they will act consistently with adequate compliance and ethics requirements, the principles envisaged in this SCoC, and always in full compliance with all applicable laws and regulations.

By accepting to work for or with Styrolution, suppliers commit to abide by this SCoC. It also applies to our suppliers’ subsidiaries and affiliates, their subcontractors or other business partners along the entire supply chain. The supplier is fully responsible for ensuring compliance by any such party as if it were the supplier itself.

We expect suppliers to use a proactive approach in establishing and maintaining the standards set forth in this SCoC, including the collection and evaluation of adequate and timely information as well as the provision of relevant documentation to Styrolution upon request. To verify compliance, Styrolution reserves the right to audit and inspect suppliers’ operations and facilities, either directly or through an accredited body, and request corrective actions if deemed necessary. If a supplier fails to comply with this SCoC, Styrolution may take action against the supplier, including suspending or terminating business relations without any right to any compensation depending on the gravity of the violation and the specific circumstances.

## LABOR PRACTICES AND HUMAN RIGHTS

Styrolution believes all employees deserve a fair, hygienic and ethical workplace. Employees must be treated with dignity and respect. Suppliers shall sustain the highest standards of human rights.

- **Anti-discrimination, anti-harassment and abuse:** Suppliers shall not discriminate against any employee based on gender, age, disability, marital status, sexual orientation, race, ethnicity, national origin, social origin or status, indigenous status, religion, caste, political affiliation or union membership, in hiring and other employment practices like salary, promotions, rewards, access to training, employment termination and retirement. Medical tests required from employees or potential employees are only to be used in a non-discriminatory way. Suppliers shall provide a workplace free of harassment, coercion and abuse. Any threats or other forms of intimidation are prohibited.
- **Prevention of forced labor and human trafficking:** Suppliers shall ensure that all work is voluntary. They shall not traffic persons or use any form of forced, bonded, slave or prison labor. Employees must not be required to surrender any government-issued identification, passports, work permits or travel documents as a condition of employment. Contracts shall clearly mention the conditions of employment in lucid language understood by the employees. Employees shall be free to terminate their employment upon reasonable notice. Suppliers shall not impose unreasonable

restrictions on movement within the workplace or upon entering or exiting company-provided facilities.

- **Prevention of child / underage labor:** Suppliers shall employ only members of staff who are at least 15 years of age or the applicable minimum legal age, whichever is higher. Legitimate workplace apprenticeship programs for educational benefit may be provided that are consistent with Article 6 or 7 of ILO Minimum Age Convention No. 138.
- **Working hours:** Suppliers shall follow all applicable laws and regulations with respect to working hours and days of rest.
- **Wages & salaries:** Fair and reasonable pay and working conditions must be provided. Suppliers shall ensure that all employees receive at least the legally mandated minimum wages and salaries, vacation time, leave periods and time off for legally recognized holidays according to applicable law and / or collective agreements. Employees shall be compensated for overtime hours according to applicable law and / or collective agreements. Suppliers shall pursue a fair remuneration policy with due recognition for performance and pay accurate wages in a timely manner.
- **Freedom of association and collective bargaining:** As legally permitted, suppliers shall freely allow employees to associate with others, form and join (or refrain from joining) organizations of their choice and seek representation to bargain collectively, without undue interference, retaliation, discrimination or harassment. Suppliers shall allow employees to express their concerns about working conditions without threats of reprisal or harassment.

## HEALTH AND SAFETY

Employee health and safety is of prime importance to Styrolution. Suppliers shall provide and maintain a safe work environment and encourage sound health and safety practices.

- **Occupational health, safety and hazard prevention:** A safe, healthy working environment must be provided for all employees, in accordance with applicable laws and regulations, with the aim of creating an incident- and injury-free work environment and preventing the occurrence of occupational illness and health problems associated with its activities. Suppliers shall identify, evaluate and manage occupational health and safety hazards through a prioritized process of hazard elimination and control. Employees shall be provided with job-related, appropriately maintained personal protective equipment and instruction on its proper use.
- **Emergency management:** Suppliers shall identify and assess potential emergency situations. For each situation, suppliers shall develop and implement emergency plans and response procedures that minimize harm to life, environment and property.
- **Sanitation, food and housing:** Suppliers shall provide employees with reasonably accessible and clean toilet facilities and drinking water. Dining, food preparation and storage facilities shall be sanitary. Dormitories are to be maintained to be clean and safe and provided with appropriate emergency exits, hot water for bathing and showering, adequate heat and ventilation, reasonable personal space along with reasonable entry and exit privileges.
- **Communication & training:** Employees must be adequately informed about health and safety issues and provided with appropriate training in their regional language to minimize health and safety risks associated with their job assignments.

## ENVIRONMENTAL PROTECTION

We are stewards of our environment and support the concept of sustainability. Our suppliers are expected to contribute to this by obeying all environmental laws and regulations and conducting all actions in a resource-conserving manner. Suppliers shall identify the risks and environmental impact of their products during the production, distribution and transportation process as well as their entire lifecycle and look for opportunities to reduce these.

- **Resource efficiency:** Suppliers shall reduce energy, water and natural resource consumption by implementing conservation and substitution measures.
- **Disposal of waste material:** Suppliers shall implement a systematic approach to identify, manage, reduce and responsibly dispose of or recycle hazardous and non-hazardous material.
- **Management of wastewater:** Suppliers shall implement a systematic approach to identify, control and reduce wastewater produced by its operations. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment systems.
- **Management of air emissions:** Suppliers shall identify, manage, reduce, and responsibly control air emissions released from its operations that pose a hazard to the environment. Suppliers shall conduct routine monitoring of the performance of their air emission control systems.
- **Prevention of pollution:** Suppliers shall minimize hazardous substance consumption by implementing reduction / substitution measures and prevent pollution of soils
- **Permits and reporting:** Suppliers shall obtain, keep current and comply with all required environmental permits. Suppliers shall comply with the reporting requirements of applicable permits and regulations.
- **Safety and health risks for local residents:** Suppliers shall systematically and regularly evaluate the impact of their activities on local residents. The results are to be documented.

## ETHICS AND FAIR BUSINESS PRACTICES

We expect our suppliers to conduct business in a fair and ethical manner.

- **Laws & regulations:** Suppliers must operate in full compliance with international, national and local laws and regulations that are applicable to their business operations and obtain all necessary permits. In particular, suppliers commit to adhere to anti-trust and other competition laws, international trade and export control regulations as well as embargoes imposed by national or supranational bodies or governments.
- **Corruption:** Suppliers refrain from any and all forms of corruption, including extortion and active or passive bribery, money laundering and insider trading. Suppliers specifically ensure that payments, gifts or other commitments to customers, government officials and any other party are in compliance with applicable anti-bribery laws.
- **Gifts:** Suppliers respect that Styrolution employees do not give or accept any gift or favor that could compromise or raise doubts about the neutrality of the decisions made by Styrolution or the supplier.
- **Conflicts of interest:** Suppliers disclose to Styrolution information regarding potential conflicts of interest as a Styrolution supplier, including disclosure of any financial interest a Styrolution employee may hold in the supplier's business.
- **Confidentiality:** Suppliers protect all confidential information provided by Styrolution and its respective business partners.
- **Intellectual property:** Suppliers commit to respect the intellectual property of Styrolution.
- **Sustainable procurement:** Suppliers shall procure goods and services in a responsible manner. They shall select their own suppliers providing goods or services based on standards comparable to those set forth in this SCoC.