

SUPPLIER CODE OF CONDUCT

The sustainability concept SPOLCHEMIE's Sustainable Growth includes close cooperation with suppliers and other business partners who are encouraged and motivated to follow the same sustainability principles and ESG (environmental, social, governance) standards and to further develop sustainability in the value chain.

We expect all our suppliers to fully comply with applicable laws and to conduct their relationship with us, any of partners and other suppliers on a fair and ethical basis and in compliance with our Supplier Code of Conduct and basic principles of sustainability.

We particularly, but now exclusively, expect you as our supplier to support, embrace and implement the following principles:

Compliance

We expect you

- to fully comply with applicable international, national, state and local laws and regulations including (but not limited to) all environmental, health and safety, labour, antitrust, trade controls, and commercial honesty rules;
- to avoid any action, which would restrict fair competition;
- to not engage in any forms of cartel practices.

Bribery, corruption

We expect you

- to prohibit and avoid all types of bribery, corruption, and money laundering;
- to prohibit and avoid demanding, receiving, offering or giving any direct or indirect bribes, payments or other rewards to persons or entities that aim to influence business decisions or otherwise encourage them to act contrary to their obligations, in particular with the aim of obtaining, retaining or controlling commercial opportunities or securing any other significant advantage in business activities.

Accounting and taxes

We expect you to faithfully record all financial transactions and maintain truthful accounting in accordance with accounting regulations and principles, in particular to ensure that all

statements, documents and invoices are accurate and complete.

Confidentiality and intellectual property

We expect you

- to respect privacy and confidential information of all your employees and business partners as well as to protect data and intellectual property from misuse;
- to protect all intellectual property you have access to in relation to our company.

Quality

We expect you

- to meet generally recognized or contractually agreed requirements regarding the product quality, product performance and product safety;
- to provide us with material safety data sheets containing all necessary safety-relevant information;
- to supply products compliant with the EU REACH regulation.

Compliance with health and safety standards

We expect you

- to provide your employees with healthy and safe working environment in accordance with the applicable international and national standards and laws;
- to protect your employees from any chemical, biological and physical hazards and physically

demanding tasks in the workplace as well as from risks associated with the use of infrastructures.

Compliance with human and labour rights

We expect you

- to act in compliance with human and labour rights, support the principles of the Universal Declaration of Human Rights and to promote diversity;
- to avoid any violation of these rights when dealing with stakeholders;
- to provide equal opportunities to people irrespective of their race, skin colour, gender, age, nationality, religion, ethnicity or other distinguishing characteristics;
- to prevent and defend any discrimination;
- to treat your employees with respect and dignity;
- to provide a workplace free of harassment or any physical or verbal abuse and any threats or other forms of intimidation;
- to refuse the use of child labour (below the minimum legal age for employment) and to comply with special need of young workers;
- to refuse the use of forced or compulsory labour;
- to respect the freedom of association, the right to organise and join trade unions and the right to collective bargaining in accordance with the applicable laws;
- to not exceed working hours limits set by the applicable international and national standards and laws;
- to respect right of employees to the payment of a wage in accordance with legal regulations

External sources:

- International Labour Standards (ILO) <http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm.ilo.org>
- Responsible Care Global Charter <http://www.responsiblecare.org>
- Universal Declaration on Human Rights https://www.un.org/en/udhrbook/pdf/udhr_booklet_en_web.pdf

The Code of Conduct shall apply to all purchase relationships between any of the following companies: Spolek pro chemickou a hutní výrobu, akciová společnost, IN: 000 11 789, EPISPOL, a.s., IN: 254 49 842, SPOLCHEMIE Distribution, a.s., IN: 241 50 584, SPOLCHEMIE Electrolysis, a.s., IN: 292 00 181, CSS, a.s., IN: 289 63 661, CHS Epi, a.s., IN: 282 07 882, SPOLCHEMIE Zebra, a.s., IN:

and to pay employees a wage regularly and duly;

- to ensure that products supplied to us do not contain conflict minerals (e.g. tin, tantalum, tungsten and gold).

Environmental protection

We expect you

- to reduce your environmental and climate impact including carbon footprint and to promote environmentally friendly actions, processes and products;
- to ensure responsible resource use (including water, raw materials, energy etc.);
- to promote improving in efficiency of resource use and reduction of use of finite or non-renewable resources;
- to ensure appropriate management of waste, air emissions and wastewater discharges;
- to avoid pollution if possible and to ensure protection of biodiversity and local communities.

Infringement of the Supplier Code of Conduct

We expect you

- to provide us with detailed explanation in the case of justified suspicion of infringement of this Supplier Code of Conduct;
- to cease any breach of obligations set out in this Supplier Code of Conduct without undue delay and to prevent such breach from reoccurring.

Suspicious of improper or unethical conduct may be reported through our whistleblowing system: <https://www.spolchemie.cz/en/for-whistleblowers/>

119 63 751, all with their business seat at Revoluční 1930/86, Ústí nad Labem – centrum, 400 01 Ústí nad labem as a purchaser and its supplier.