

# ***OUR VALUES AT WORK***

Supplier Code of Conduct  
September 2023

***Envalior***  
Imagine the Future



# A MESSAGE FROM *OUR CPO*

Dear Business Partner,

At Envalior, integrity is at the heart of our legacy – and it continues to guide our journey forward as we Imagine the Future together. After all, good business conduct forms the foundation of our success, not only as a leading global engineering materials player, but also as a company that is respected and trusted by all our stakeholders.

We are committed to conducting our business with the highest standards of business conduct and ethics. Our employees as well as our business partners have a joint responsibility to maintain and promote these standards within our organizations.

As a global company, we are responsible to our employees, customers, shareholders, and the societies in which we operate. We are convinced that long-term corporate success and added value for society can only be achieved through consistently responsible, value-based, and lawful action. Envalior promotes these principles throughout its entire value chain. A key criterion during the business partner selection process is the extent to which they share and comply with our values.

These values are geared toward the UN Sustainable Development Goals as well as the standards applicable to the chemical industry, and they are published in our Envalior corporate policy as well as the Envalior Code of Business Conduct. Envalior is committed to adhering to strict principles in the fields of, for example, anti-corruption, working standards, human rights, and environmental protection.

Envalior requires its business partners to confirm compliance with the principles contained in this Supplier Code of Conduct as well as with all applicable laws and regulations wherever they operate. On behalf of the entire management team,

I thank you for your cooperation.  
*Paula Tinkler, Envalior Chief Procurement Officer*

# OUR BUSINESS PRINCIPLES

Our business principles capture three dimensions: People, Business and Communities. We consider all three intertwined and equally important.

## II. A

# PEOPLE

Workplace safety, respect for people, recognition of their fundamental rights, and a belief in the power of their diversity are key principles at Envalor. Our organizational policy is based on openness, fairness, and trust and is aimed at promoting personal growth and integrating different views. Safety and health are our top priorities.

As our business partner, you commit to Envalor that you will:

- put the health and safety of your and our employees first. You encourage your employees to speak up to prevent accidents and injuries and minimize health risks associated with our workplaces.
- adhere to the applicable laws and regulations on product safety (e.g., regarding the classification, labeling, and packaging of hazardous substances and mixtures) and any statutory provisions regarding health and safety in the workplace. Employees are particularly informed of workplace hazards as well as the appropriate protective measures and receive suitable protective equipment and clothing at no cost to them.
- treat all employees equally regardless of their ethnic heritage, skin color, age, gender, religion, nationality, sexual orientation, social background, physical and mental abilities, or political opinion.
- respect the rights of all human beings and comply with the Universal Declaration of Human Rights and the Ten Principles of the UN Global Compact as well as the labor standards of the International Labor Organization (ILO). You prevent child labor as well as forced labor as well as any form of modern slavery and human trafficking.
- respect the fundamental right of all employees to form or join worker representations as well as a living wage, statutory social benefits, and a reasonable limitation of working hours.
- do not employ security forces that use unreasonable measures against your employees and refrain from unlawfully evicting or grabbing the land of your workers and your subcontractors.
- provide your employees and business partners with channels to report violations of the principles specified herein or violations of laws.
- protect the personal data of your employees, customers, suppliers, and other data subjects, and comply with all applicable data protection laws.





## II. B

# BUSINESS

Envalior stands for integrity in conducting all business affairs. Every employee and business partner always needs to comply with all applicable laws and regulations. Our joint success is always based on the quality of your and our solutions and products and never on any bribes to prospects or customers.

As our business partner, you commit to Envalior that you will:

- comply with the applicable antitrust laws and do not enter any anti-competitive arrangements with your suppliers, competitors, or customers.
- comply with all applicable laws, regulations, and sanctions, including laws to combat international terrorism, when importing and exporting goods or services and when transmitting information.
- not tolerate any form of corruption and procure that employees, subcontractors, or agents neither accept bribes or kickbacks from business partners, public officials, or third parties nor offer bribes or kickbacks to them.
- refrain from improper donations, inappropriate gifts, invitations, entertainment, or other undue benefits meant to influence our employees or third parties.
- do not demand or accept any inappropriate benefits.
- comply with the applicable legal provisions when dealing with public authorities and officials.
- use advisers and intermediaries only in compliance with applicable laws.
- implement effective measures against money laundering and terrorist financing in your organization.
- respect the know-how, patents, and trade/business secrets of Envalior and others.

*"Our joint success is always based on the quality of your and our solutions and products."*

II. C

# COMMUNITIES

At Envalor, we know that we can only create brighter lives for all if we take responsibility for the environment, and we are convinced of the importance of sustainable entrepreneurship and good corporate citizenship. This means that we strive to conduct our activities in a way that meets today's needs without compromising the ability of future generations to meet their needs.



**As our business partner, you commit to Envalor that you will:**

- observe environmental regulations and international standards.
- protect the environment by conserving natural resources and minimizing the environmental impact caused by your products and their production.
- help to reduce energy consumption and harmful emissions.
- avoid mercury pollution.
- properly and professionally handle persistent organic pollutants and hazardous waste, if applicable.
- comply with all applicable laws and regulations regarding conflict minerals.

# ACKNOWLEDGMENT AND CONTACT INFO

As our business partner, you commit to comply with the principles in the business relationship with Envalior. You agree to also communicate these principles or equivalent ones to your own business partners that you engage in the context of its business relationship with Envalior and to promote compliance with them.

If you have established your own code of conduct and it is equivalent to the principles specified in this document, we will mutually acknowledge our respective codes as equivalent.

Envalior considers compliance with the principles above to be essential to the business relationship between Envalior and the business partner. If you fail to observe these principles, Envalior reserves the right to discontinue the contractual relationship with you.

Envalior has implemented a groupwide Compliance Management System which is administered by Envalior's Compliance Organization. The fundamental aim of the Compliance Management System is to ensure compliance appropriately and effectively throughout the Envalior Group to promptly address illegal or unethical conduct at the Envalior Group and to take appropriate measures to avoid misconduct. Our reporting channels are also available for our



**SPEAK UP**

Business Partners, and they can submit a report using the channels listed further below (anonymously if they wish). The Compliance Organization ensures that reporting channels are open and that any information which is submitted to these channels is kept confidential.

## HOW TO REPORT VIOLATIONS

### How to report violations

Website and Policy: [www.Envalior.com/SpeakUp](http://www.Envalior.com/SpeakUp)

Email: [SpeakUp@Envalior.com](mailto:SpeakUp@Envalior.com)

Telephone: See website

Online (anonymous): <https://envalior.speakup.report/external>

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