



# SUPPLIER CODE OF CONDUCT

# Content

<b>Introduction</b>	<b>3</b>
<b>Compliance with Laws</b>	<b>3</b>
<b>Human Rights</b>	<b>3</b>
<b>Employment Practices</b>	<b>3</b>
Diversity and Inclusion	3
Wages and Benefits	4
Working Hours	4
Social Dialogue and Freedom of Association	4
Disciplinary and Grievance Procedures	4
<b>Health, Environmental and Climate Protection</b>	<b>4</b>
Management System for Health Protection and Occupational Safety	4
Management of Ingredients and Chemicals	4
Sustainable Product and Process Development, Decarbonization	5
<b>Compliance and Integrity</b>	<b>5</b>
<b>Supply Chain Due Diligence and Conflict Minerals</b>	<b>5</b>
<b>Governance</b>	<b>6</b>
<b>Commitment</b>	<b>6</b>

## Introduction

The companies of the MANKIEWICZ Group of Companies (hereinafter "MANKIEWICZ") are committed to complying with all applicable laws, respecting human rights and social standards, operating fairly in business and protecting the environment. The MANKIEWICZ Supplier Code of Conduct is an integral part of our policies and guidelines to ensure compliance with all applicable laws and regulations in the jurisdictions in which MANKIEWICZ operates.

MANKIEWICZ wants to promote its principles of conduct along the entire value chain. For this reason, we have set out in this MANKIEWICZ Supplier Code of Conduct the fundamental requirements in terms of human rights, working conditions, the environment, compliance and integrity that we expect our suppliers to apply. The code is based on the ten principles of the UN Global Compact, which are founded on the Universal Declaration of Human Rights, the core labour standards of the International Labour Organisation, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption.

We expect our suppliers to cascade these principles through their own supply chain as well.

## Compliance with Laws

Suppliers shall comply with all laws and regulations applicable to them, including the local laws and regulations in all countries outside their home country in which they do business.

## Human Rights

Suppliers are expected to conduct business in a way that respects human rights by treating their own employees and those working for their suppliers with respect and dignity and promoting fair employment practices. This includes providing fair and competitive wages, prohibition of harassment, bullying and discrimination, prohibition of unethical recruitment practices, prohibition of child and forced labour, bonded or indentured labour or prison labour, not engaging in trafficking of persons for any purpose.

## Employment Practices

Suppliers are expected to provide their employees with a working environment free from physical, psychological, sexual or verbal harassment, intimidation or other abusive behaviour.

### *Diversity and Inclusion*

Suppliers are expected to foster a diverse and inclusive work environment where employees are treated with dignity, respect and fairness regardless of race, colour, religion, gender, age, ethnic or national origin, disability, sexual orientation, gender identity, marital status, nationality, political preference or other personal characteristics.

Suppliers shall provide equal employment opportunities to employees and applicants for employment without discrimination and shall comply with all non-discrimination laws and regulations.

Suppliers shall ensure employment, including hiring, payment, benefits, termination and retirement, based on ability, not personal characteristics.

### *Wages and Benefits*

Suppliers must pay workers at least the minimum compensation required by applicable local law and provide all legally mandated benefits.

Deductions from wages as a disciplinary measure or other deductions not enshrined in national law are not permitted.

### *Working Hours*

Suppliers are expected to operate in consideration of the International Labour Organisation (ILO) standards regulating working and resting hours, maximum consecutive days of work and annual leave.

### *Social Dialogue and Freedom of Association*

Suppliers shall respect the rights of workers to engage in trade union activities, to organise and to bargain collectively as provided under applicable law and regulations and in accordance with International Labour Organisation (ILO) Conventions.

The right of employees to exercise their statutory rights of free organisation, including joining or not joining any organisation of their choosing within the appropriate national legal framework, shall be recognised and respected.

### *Disciplinary and Grievance Procedures*

Suppliers are expected to have a disciplinary process in place to address issues regarding employee work, conduct or absences.

A grievance procedure must be available for employees to raise a workplace concern or problem or to appeal a disciplinary decision.

## **Health, Environmental and Climate Protection**

### *Management System for Health Protection and Occupational Safety*

Suppliers are expected to establish an appropriate occupational health and safety management system (e.g. ISO 45001 or equivalent), including policies and procedures aimed at effectively protecting the health, safety and welfare of employees, business partners, visitors and others who may be affected by their activities by striving to eliminate fatalities, work-related injuries, health impairment and limiting exposure to safety hazard.

### *Management of Ingredients and Chemicals*

Suppliers are expected to provide MANKIEWICZ with up-to-date information on regards to environmental, occupational health and safety (EHS) matters of their products to enable safe usage of these products in the whole life cycle.

You are also expected to cooperate with MANKIEWICZ downstream requirements in relation to Supplier's products and/or services to be fulfilled.

In addition, suppliers are expected to anticipate future regulatory constraints on certain chemicals/substances to order to ensure continuity of supply.

### *Sustainable Product and Process Development, Decarbonization*

Suppliers actively support MANKIEWICZ' efforts to achieve greater sustainability and make their best effort to develop innovative products and processes that have the lowest possible environmental impact throughout the lifecycle.

Suppliers are expected to reduce their climate change impact, and to establish a system to measure and minimize greenhouse gas emissions. In addition, suppliers are expected to improve their efficiency of usage of energy, water and natural resource, minimize waste and use of hazardous materials, dispatch goods in an adequate outer packaging and foster reusable/recycled packaging materials such as reduced single used plastic, protect biodiversity and responsibly manage their air emissions

## **Compliance and Integrity**

Suppliers demonstrate responsible business conduct. This means that they comply with all applicable laws and regulations (including this MANKIEWICZ Supplier Code of Conduct).

Suppliers shall at no time exert undue influence on MANKIEWICZ employees in their business relations with MANKIEWICZ.

Suppliers are expected to avoid any conflicts of interest or situations that give the appearance of a potential conflict of interest.

Suppliers shall avoid any form of fraud (e.g. misleading financial reporting), unfair competition (price fixing, abuse of power, exchange of confidential commercially sensitive company information), bribery (offering benefits to employees to influence business decisions), extortion and money laundering.

Suppliers are expected to keep, store and maintain records and not alter any entry to conceal or misrepresent the underlying transaction.

Suppliers shall comply with international trade regulations, sanctions, embargoes and export control regulations. Suppliers will comply with all applicable data protection laws.

Suppliers shall at all times respect MANKIEWICZ' facilities, systems, premises, land and intellectual property and use the foregoing as intended.

## **Supply Chain Due Diligence and Conflict Minerals**

Suppliers are expected to implement due diligence processes in order to identify, prevent and mitigate risks for negative human rights and environmental impacts in their supply chains, including appropriate grievance mechanisms and reporting based on the United Nations Guiding Principles on Business and Human Rights.

Suppliers will comply with all applicable laws regarding supply chain due diligence. As part of overall supply chain due diligence, the supplier is expected to support due diligence processes and traceability throughout its supply chain.

Suppliers must comply with applicable laws and regulations regarding direct or indirect sourcing of critical materials and minerals from conflict areas (if contained in purchased products). Those minerals include "conflict minerals" (tin, tungsten, tantalum and gold) and other minerals or metals (e.g. mica). Suppliers shall establish a policy and management system to reasonably assure that the conflict minerals as well as critical materials, which may be contained in the products they deliver, are sourced responsibly (i.e. with limited environmental impact and not detrimental to human rights).

Suppliers shall support efforts to eradicate the use of conflict materials that directly or indirectly finance or benefit armed groups or that are perpetrators of serious human rights abuses. Suppliers are expected to conduct due diligence and provide MANKIEWICZ with evidence of their sources and chain of custody certification for these mineral raw materials upon request, and to identify to MANKIEWICZ any potential doubt on the origin and/or the production means.

If the event that the material "chain of custody" supplied is "indeterminable" or is otherwise unknown, suppliers are expected either to attain the necessary certifications, or phase out the source of the mineral.

## Governance

Suppliers are expected to provide employees and third parties with access to an adequate reporting channel to raise legal or ethical concerns without fear of retaliation.

The e-mail address [hinweise@mankiewicz.com](mailto:hinweise@mankiewicz.com) is available to suppliers and their employees as a secure and confidential channel through which they may raise alerts relating to MANKIEWICZ in the areas of bribery, human rights, environmental and health protection, occupational and product safety.

## Commitment

The Supplier agrees to comply with the principles of the MANKIEWICZ Supplier Code of Conduct, either by applying this Code of Conduct or by ensuring that its own code of conduct and current sustainability practices in relation to the supply chain are consistent with the principles set out in the MANKIEWICZ Supplier Code of Conduct.

The Supplier shall ensure that it has put appropriate systems and control mechanisms in place to ensure the application of this Code of Conduct and to address and take appropriate action in respect of any breaches (of whatever party) of which it becomes aware.

The Supplier accepts that this document constitutes a commitment with regard to the principles stated therein, which shall apply to all existing contracts. The Supplier further acknowledges that any serious breach of the MANKIEWICZ Supplier Code of Conduct committed by the Supplier in the opinion of MANKIEWICZ may result in the suspension or termination of the business relationship with MANKIEWICZ and of any contracts for goods already committed.

MANKIEWICZ reserves the right to inspect the suppliers by on-site inspections within the scope of the usual or contractually agreed supplier audits with regard to compliance with this MANKIEWICZ Supplier Code of Conduct



[www.mankiewicz.com](http://www.mankiewicz.com)