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SUPPLIER CODE OF CONDUCT

To us, development, safety and sustainability are core values that permeate everything we do. This includes our relations with partners and suppliers. Through long-term business relations we promote safety for us, our employees, our customers and our suppliers. We also promote a sustainable development of products and business relations. Our Code of Conduct applies to all suppliers providing products or services to Troax, and to their employees. We also expect our suppliers to apply and monitor these minimum standards to their sub-suppliers and subcontractors and their employees, to ensure the same commitment throughout the value chain.

Laws and regulations

We expect all our suppliers to operate in full compliance with relevant laws and regulations applicable to the operations and employment in the countries in which they operate, and to Troax Quality and Environment Policies, available at <https://www.troax.com/global/en/sustainability-safety>. This is a minimum requirement in all sections of our Code of Conduct.

Business ethics

Trust and reliability are highly appreciated values to us. This means that we operate our business with a high standard of ethics and integrity. Every form of corruption or bribery is forbidden. No employee may offer, give or receive any gift or payment which is, or may be construed as being, a bribe. Any demand for, or offer of, a bribe must be rejected immediately and reported to the management. Suppliers shall not violate any international anti-corruption conventions and applicable laws and regulations of the countries in which they operate, and they shall not engage in corruption, extortion, or embezzlement in any form.

All gifts of cash or granting loans to our employees or anyone representing our company is totally forbidden.

We also expect you to respect intellectual and other property rights and that you take appropriate measures to protect the personal data of customers, employees and other business partners.

Health and safety

All employees shall be provided with a safe and healthy working environment and, when applicable, safe and healthy residential facilities. Suppliers shall provide employees with appropriate workplace health and safety information, training and warnings, in the primary language of its employees.

Non-discrimination

We value and respect diversity and cultural differences. All employees, regardless of race, nationality, social background, possible disability, sexual orientation, political or religious conviction as well as their gender, gender identity, marital status or age, shall not be discriminated against for



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employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline and termination. All employees shall be treated strictly according to his or her abilities and qualifications in all employment decisions.

Harassment and abuse

All employees shall be safe at work. No employee shall be treated harsh or inhumane, including but not limited to, physical, sexual, psychological or verbal harassment, intimidation or abuse.

Forced labour and child labour

Forced, involuntary, uncompensated or trafficked labour is not tolerated in any form. Employees shall not be required to lodge deposits or identification documents and shall be free to leave work at any time or terminate their employment after reasonable notice.

Child labour is not tolerated in any form. Unless local law stipulates a higher age limit, no person younger than the age for completing compulsory education or younger than 15 shall be employed.

Human right abuses in conflict-affected areas

We do not accept that sourcing of material in products, parts or components directly or indirectly contribute to human right abuses, unethical business conduct, environmental damage or funding for conflict. You are expected to ensure that you and your suppliers perform adequate screening on your counterparties to ensure metals and minerals are responsibly sourced and traded. When dealing with materials from conflict-affected and high-risk areas, the Extended Mineral Reporting Template – EMRT (a free, standardized template created by the RMI - Responsible Mineral Initiative) must be submitted.

Employment contract, working hours, compensation and freedom of association

All employees are entitled to a written contract of employment.

The employer shall comply with applicable laws and industry standards on working hours. Except in extraordinary circumstances, all employees shall be entitled to at least one day off in every seven-day period.

Wages, including overtime compensation and benefits, shall equal or exceed the level required by applicable laws.

All employees shall be free to exercise their legal rights to form, join or refrain from joining organizations representing their interests as employees. If the right to freedom of association is restricted or prohibited under law, the employer shall not restrict alternative forms of independent and free workers' representation. The employees' right to collectively bargaining shall be respected. No employee shall be subject to intimidation or harassment in his or her peaceful exercise of these rights.



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Environmental management

All suppliers and their subcontractors shall operate in full compliance with applicable environmental legislation and, if applicable, with specific requirements of Troax. Relevant environmental aspects in their design, manufacturing process and waste emissions, shall be identified, and appropriate actions shall be taken to address these, including resource consumption, emissions, chemicals and waste.

We expect you to reduce the impact on the environment and the reduce the greenhouse gas emissions occurring in your own business, as well as your supply chain by;

- Increase energy efficiency and the use of renewable energy sources,
- supplying quality according to specification to minimize waste,
- Managing air quality and emissions,
- Managing water quality and consumption
- Support the reduction of waste and support the use of recycled and sustainable materials

Product safety

All products and services must meet the quality and safety criteria specified in relevant contract elements and meet all legislative requirements. The supplier must manage the product safety risks throughout the entire supply chain. Suppliers must use raw material of known origin and ensure the traceability of raw material and finished products. Suppliers must ensure that delivered products, if used as intended, are safe for people and environment

Business continuity planning

All suppliers shall implement a business continuity plan in order to mitigate exposures to terrorism, crime, business threats, pandemics, natural disasters and related major accident exposures.

Supply Chain

The supplier shall ensure that all its sub-suppliers and subcontractors recognize and respect the requirements of this Code of Conduct.

Data privacy, Intellectual property, and Confidentiality

Data privacy and intellectual property rights shall be respected. Suppliers must only make appropriate use of confidential information. Suppliers must deploy and maintain adequate measures to protect the confidentiality, integrity, and availability of confidential information and personal data. The transfer of technology and know-how must be done in a manner that protects intellectual property rights.



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Monitoring and Compliance

Our employees and suppliers are encouraged and expected to report incidents of non-compliance with this Code of Conduct. Reported information will only be processed to the extent reasonably necessary for the investigation. There will be no retaliation or other negative consequences for individual reporting on such incidents. In case of serious breaches of this Code of Conduct, the Supplier shall within one month present an action plan to make sure that they comply with the Code.

We also use our Self Assessment questionnaire to monitor compliance with the Code of Conduct.

As a condition of doing business with Troax Group, suppliers must permit Troax, or their designated agents, to perform audits, including confidential employee interviews, in order to monitor and review the compliance of this Code of Conduct.

You undertake to cooperate with us both with self-assessment questionnaires and on-site audits. Failures to do so may have consequences for the continuation of the relationship between Troax and yourself.

Duty to report concerns

We expect you to provide your employees with a safe and confidential channel to raise concerns and report non-conformance without fear or any form of retaliation. You similarly undertake to report any irregularity noted with regards to Troax and/or how we do business. Contact the Speak up portal at:

Management commitment

Suppliers must adopt or establish a management system designed to ensure compliance with this Code of Conduct for Suppliers and applicable laws and regulations; identify and mitigate related operational risks; and facilitate continuous improvement.

Suppliers shall have processes to identify, monitor, and understand applicable laws and regulations and the additional requirements imposed by this Code of Conduct for Suppliers.

Suppliers shall obtain, maintain, and keep records to ensure regulatory compliance and conformity to this Code of Conduct for Suppliers, with appropriate confidentiality measures to protect privacy.

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Place and date

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Company Name

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Signature and title of authorized representative