



Supplier Code of Conduct



Version 1.4 – May 2026



Supplier Code of Conduct



INTRODUCTION

Dear Valued Suppliers,

At Klöckner Pentaplast (kp), sustainability and responsible business conduct is embedded in every aspect of our business and operations, including sourcing and procurement. As environmental, social and governance challenges continue to evolve, we recognise our responsibility to contribute to effective solutions. In addition to complying with applicable laws, rules, and regulations, we have established a framework of policies and controls designed to uphold high ethical, environmental and human rights standards.

We are a signatory to the United Nations Global Compact and support the United Nations Sustainable Development Goals, which align with our business purpose sustainability commitments. This Supplier Code of Conduct is also informed by the United Nations Guiding Principles on Business and Human Rights, the OECD due diligence guidance for responsible business conduct (RBC), and the Core Conventions of the International Labour Organization (ILO), including the ILO Declaration on Fundamental Principles and Rights at Work.

We encourage our suppliers to decarbonise the supply chain and require them to conduct business in an ethical, responsible and transparent manner, with particular attention to human rights, labour standards, environmental performance, and business integrity. In addition to complying with applicable laws and regulations, kp expects our suppliers to implement appropriate policies, due diligence processes and controls to meet the requirements of this Supplier Code of Conduct and to drive continuous improvement.

We are committed to continuous improvement and expect our suppliers to cascade similar principles throughout their own supply chains, to monitor compliance and to address adverse impacts in a timely manner.

Thank you for your continued support of these important topics.

Best regards,

Shené Mitchell
General Counsel, PHD

Carolyn Tan
General Counsel, FP



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LABOUR & EMPLOYMENT

1. Freely Chosen Employment

Suppliers shall prohibit all forms of forced, bonded, indentured or involuntary prison labour, slavery and human trafficking and shall ensure that temporary labour providers, recruiters or contract manufacturers acting on their behalf comply with the same requirements. Additionally, suppliers shall not support, promote or engage in the practice of slavery or human trafficking including by way of payment of recruitment fees.

2. Child Labour

Suppliers shall not use child labour and shall comply with all applicable minimum age laws and ILO standards. Suppliers shall maintain age verification procedures and, where any instance of child labour is identified, shall implement prompt remediation measures that prioritise the best interests, safety, education and welfare of the child.

3. Freedom of Association

Suppliers shall respect the rights of workers, as set forth out in applicable law, to associate freely, to join or not join labour unions or workers' councils, and to seek representation without fear of intimidation, harassment or retaliation.

4. Wages, Benefits and Working Hours

Suppliers shall pay workers in a timely manner and in compliance with applicable laws, including laws regarding minimum wages, working hours, overtime hours and statutory benefits. We also encourage suppliers to regularly assess wage levels and whether workers earn enough to meet their basic needs and the needs of their family.

5. Diversity & Inclusion

Suppliers shall promote a workplace that is inclusive, respectful and free from discrimination, harassment and abuse. The rights of workers should stand regardless of race, gender, age, sexual orientation, disability, religion, or other characteristics. Suppliers shall treat their employees and other stakeholders with dignity and respect and implement appropriate policies, training and compliant handling procedures.



SUPPLY CHAIN RESPONSIBILITY

6. Transparency & Traceability

Suppliers shall maintain appropriate transparency and traceability within their supply chains, including records sufficient to identify the source of key materials, the countries of origin and material environmental, social, and governance (ESG) risks. Suppliers shall provide relevant traceability information to kp upon request.

7. Responsible Sourcing

Suppliers shall implement responsible sourcing practices for materials and components, including risk-based due diligence relating to conflict affected and high risk areas, indigenous peoples' rights, land rights, cultural heritage, and other significant environmental or social impacts.



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8. Conflict Minerals

Suppliers shall comply with all applicable laws and regulations concerning conflict minerals and shall conduct due diligence consistent with OECD Due Diligence Guidance for Responsible Supply Chains or Minerals from Conflict-Affected and High-Risk Areas. Upon request, suppliers shall provide complete and accurate mineral sourcing disclosures, including recognised reporting templates where relevant.

9. Collaboration

Suppliers shall cooperate with kp in addressing actual or potential supply chain issues, including timely participation in corrective action, remediation, audits, investigations and improvement initiatives.



ETHICAL BEHAVIOUR

10. Anti-Corruption and Business Integrity

All forms of corruption, bribery, extortion, embezzlement and other improper business conduct are prohibited. Suppliers shall not directly or indirectly offer pay, promise, request or accept bribes or other improper advantages, in dealings with public or private parties for the purpose of gaining favourable treatment. Suppliers shall comply by all applicable anti-corruption laws and regulations in the countries in which suppliers conduct business.

11. Antitrust and Competition Laws

Suppliers shall comply with applicable antitrust and competition and shall compete fairly. Suppliers shall not engage in price fixing, bid rigging, price discrimination, market allocation, abuse of dominance, unlawful exchange of competitively sensitive information, or other anti-competitive practices.

12. Conflicts of Interest

Suppliers shall not engage in any activity that could create a conflict of interest.

13. Legal Requirements

Suppliers shall fully comply with all applicable laws, rules and regulations in the jurisdictions in which they operate, including those relating to labour, health and safety, the environment, product compliance, trade sanctions, export controls and customs.

14. Privacy and Data Security

Suppliers shall protect confidential, proprietary, and personal data and shall comply with applicable data protection and privacy laws. Suppliers shall implement appropriate technical and organisational measures to safeguard such data, restrict access on a need-to-know basis, and notify kp without undue delay of any actual or suspected data breach affecting kp information.

15. Supplier Diversity

Suppliers are encouraged, where relevant to their business, to promote an inclusive supply chain and actively seek opportunities to collaborate with diverse suppliers. Any such initiatives shall be implemented in compliance with applicable law.



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16. Tax Evasion and the Facilitation of Tax Evasion

Suppliers shall not engage in tax evasion or the facilitation of tax evasion in connection with their business with kp. kp has zero tolerance of tax evasion and expects those it works with to adopt the same approach, including maintaining appropriate controls and procedures to prevent, detect and address tax evasion risks.



HEALTH & SAFETY

17. Health & Safety

Suppliers shall provide employees with a safe and healthy workplace in accordance with applicable law, and shall identify, assess and control protect employees from chemical, biological, physical and other workplace hazards. Suppliers shall provide appropriate training, personal protective equipment, emergency preparedness measures, incident reporting and, where appropriate, management systems to support continual improvement.

18. Quality & Product Safety

Suppliers shall ensure that all products and services supplied to kp comply with applicable legal requirements, agreed specifications and relevant quality and safety standards.



ENVIRONMENT AND SUSTAINABILITY

19. Resource Efficiency

Suppliers shall implement environmentally responsible practices, such as minimising waste, preventing pollution, reducing energy consumption, and responsibly managing natural resources. Suppliers shall comply with applicable environmental laws and regulations and should maintain an environmental management system appropriate to the nature and scale of their operations. Suppliers shall manage hazardous and non-hazardous waste responsibly, and work towards the minimisation of waste to landfill. Suppliers are expected to implement measures that promote efficient and responsible water use in their operations.

20. Greenhouse Gas Emissions

Suppliers shall work to improve their environmental performance and reduce their greenhouse gas emissions. Suppliers shall, where relevant, quantify their greenhouse gas emissions in all Scopes (1, 2 and 3), maintain reliable supporting data and establish time-bound emission reduction targets aligned with a 1.5 degree Celsius pathway where feasible. Suppliers are expected to implement decarbonisation measures in their own operations and encourage equivalent action within their own supply chains.

21. Biodiversity

Suppliers shall comply with applicable laws, regulations and standards that pertain to biodiversity conservation and prioritise sustainable sourcing practices that minimise negative impacts on biodiversity. Suppliers shall take measures to prevent and mitigate the degradation of ecosystems within their operational areas. This includes avoiding activities that result in deforestation or habitat destruction. Suppliers shall protect natural habitats and land conservation and must not engage in activities that harm or exploit protected species.



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MANAGEMENT PRACTICES

22. Business Continuity

Suppliers shall develop, maintain and test appropriate business continuity and resilience plans for operations supporting kp's business, including plans addressing significant operational disruptions, cyber incidents, utility interruption and other relevant risks.

23. Commitment and Accountability

Suppliers shall assign responsibility for compliance with this Supplier Code by allocating appropriate resources.

24. Confidentiality

Suppliers shall protect kp information in strict confidence and shall not use or disclose such information to any unauthorised third party, except as authorised and necessary for the performance of their obligations.

25. Compliance Assessment

Suppliers shall monitor their compliance with this Supplier Code. kp reserves the right to assess compliance with this Supplier Code through use of kp personnel or third parties through audits, inspections or other means. Suppliers shall cooperate fully, provide accurate information and implement corrective action plans within agreed timeframes. Material non-compliance, refusal to cooperate or failure to remediate may result in suspension or termination of the business relationship, subject to applicable law and contract.



QUESTIONS AND CONCERNS

Suppliers should contact kp if they have any questions about this Supplier Code or its application. If suppliers have concerns or become aware of a potential violation of this Supplier Code, they should report such concerns and promptly through appropriate channels, including kp's compliance contact at compliance@kpfilms.com or by the anonymous kpEthicsHotline, available at [EthicsPoint - Kleopatra Lux](#).

kp will not tolerate retaliation against any person who raises a concern in good faith.



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Version and Revision Date	Document Authorizer	Document Initiator	Revision Details	Next Revision Date
Version 1.1 March 2021	Tony Harrison Chief Procurement Officer Susan Fornaro General Counsel and Chief Compliance Officer	Kristen Mavraganis Corporate Counsel, Americas	New policy developed to align with kp's Sustainable Procurement Strategy	July 2023
Version 1.2 July 2023	Tony Harrison Chief Procurement Officer Svetlana Walker General Counsel and Chief Compliance Officer	Jana Lena Fries Group Procurement Manager Sustainability & ESG	Policy updated with additional content	Aug 2024
Version 1.3 August 2024	Ranga Mulabagula Chief Procurement Officer Svetlana Walker General Counsel and Chief Compliance Officer	Jana Lena Schönberger Group Procurement Manager Sustainability & ESG	Policy updated with additional content on Tax which was legally required	August 2026
Version 1.4 May 2026	Shené Mitchell General Counsel, PHD Carolyn Tan General Counsel, FP	Jana Lena Schönberger Group Procurement Manager Sustainability & ESG	Policy updated because of change in personnel	May 2028