



# Supplier Code of Conduct



Version 1.3 – August 2024



## Supplier Code of Conduct



### **INTRODUCTION**

Dear Valued Suppliers,

At Klöckner Pentaplast (kp), commitment to sustainability is integrated into every aspect of our business, including sourcing and procurement. While the environmental and social challenges around us continue to evolve and grow, we have always understood our responsibility to be part of the solution to these challenges. In addition to our focus on compliance with laws, rules, and regulations governing our activities, we have developed a framework of policies to help drive high ethical standards.

Moreover, we are a United Nations Global Compact signatory and fully dedicated to their United Nations Sustainable Development Goals, which align with the mission and purpose of our business and our commitment to sustainability. kp's Supplier Code of Conduct is also aligned with the United Nations Guiding Principles on Business and Human Rights and the Core Conventions of the International Labour Organization (ILO), including the ILO Declaration on Fundamental Principles and Rights at Work.

We strive to collaborate with our suppliers to decarbonise the supply chain and conduct business in a highly ethical and responsible way, focusing on human rights and social impacts in all areas. In addition to complying with the applicable laws and regulations, kp expects that our suppliers aspire to embrace sustainable activities. We require that our suppliers share the same core values and operate ethically by adhering to our Supplier Code of Conduct, which provides guidance for doing business with kp.

We are committed to continually improving our operations and expect our suppliers to promote similar principles throughout their supply chain.

Thank you for your continued support to these important topics.

Best regards,

Ranga Mulabagula  
Chief Procurement Officer

Svetlana Walker  
General Counsel and Chief Compliance Officer



## Supplier Code of Conduct



### **LABOUR & EMPLOYMENT**

#### **1. Freely Chosen Employment**

Suppliers shall not permit temporary service agencies or contract manufacturers that perform services on their behalf, to use forced, bonded or indentured labour. 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 in violation of any applicable law in countries where suppliers operate and must comply with all other applicable child labour laws.

#### **3. Freedom of Association**

Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, to join or not join labour unions or workers' councils, and to seek representation.

#### **4. Wages, Benefits and Working Hours**

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

#### **5. Diversity & Inclusion**

Suppliers should promote diversity and inclusion within their workforce and business practices. The rights of workers should stand regardless of race, gender, age, sexual orientation, disability, religion, or other characteristics. Discrimination or harassment of any kind will not be tolerated. We expect our suppliers to be inclusive and ensure that their employees and other stakeholders are always treated with dignity and respect.



### **SUPPLY CHAIN RESPONSIBILITY**

#### **6. Transparency & Traceability**

Suppliers must ensure transparency and traceability within their supply chain.

#### **7. Responsible Sourcing**

Suppliers must adhere to responsible sourcing practices of materials and components like avoidance of sourcing from conflict zones and respecting indigenous rights and cultural heritage.

#### **8. Conflict Minerals**

Suppliers shall ensure that products supplied to kp do not contain metals derived from conflict minerals and suppliers must comply with all applicable laws and regulations concerning the sourcing of minerals from conflict areas.

#### **9. Collaboration**

Suppliers should be cooperative in addressing potential supply chain issues.



## Supplier Code of Conduct



### **ETHICAL BEHAVIOUR**

#### **10. Anti-Corruption and Business Integrity**

All forms of corruption are prohibited. Suppliers shall not directly or indirectly offer pay, promise or accept bribes or participate in other illegal inducements with public or private parties for the purpose of gaining favourable treatment. Suppliers shall abide by all applicable anti-corruption laws and regulations in the countries in which suppliers conduct business.

#### **11. Antitrust and Competition Laws**

Suppliers shall not violate antitrust and competition laws in the countries in which they operate. Suppliers shall operate in fair competition and shall not engage in price fixing, price discrimination, or unfair trade practices in violation of the law.

#### **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 laws, rules and regulations applicable to the countries in which they operate.

#### **14. Privacy and Data Security**

Suppliers should protect confidential and personal data and work in compliance with data protection laws. They should ensure that the handling of sensitive information is secure.

#### **15. Supplier Diversity**

Suppliers shall build an inclusive supply chain and actively seek opportunities to collaborate with diverse suppliers. Suppliers shall create an inclusive environment that supports growth and development of diverse business.

#### **16. Tax Evasion and the Facilitation of Tax Evasion**

Suppliers shall not engage in any activity in their business with kp which involves tax evasion or the facilitation of tax evasion. kp has zero tolerance of tax evasion and expects those it works with to adopt the same approach, including maintaining appropriate prevention procedures.



### **HEALTH & SAFETY**

#### **17. Health & Safety**

Suppliers shall provide employees with a safe and healthy workplace in accordance with applicable local and national laws, and protect employees from chemical, biological and physical hazards.

#### **18. Quality & Product Safety**

Suppliers shall ensure that all products and services provided meet the quality and safety standards required by applicable law and any applicable specifications and quality standards.



## Supplier Code of Conduct



### ENVIRONMENT AND SUSTAINABILITY

#### 19. Resource Efficiency

Suppliers shall adopt environmentally sustainable practices, such as minimising waste, preventing pollution, reducing energy consumption, and responsibly managing natural resources. Compliance with applicable environmental laws and regulations is expected. We expect our suppliers to have waste management systems in place that ensure the proper treatment of hazardous waste and 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

Our suppliers should strive to improve their own environmental performance and reduce their greenhouse gas emissions. Suppliers should quantify their greenhouse gas emissions in all Scopes (1,2 and 3) and adopt ambitious emission reduction targets to limit global warming to 1.5-degree Celsius. Suppliers are expected to take steps to address their own operations towards decarbonisation, while challenging their own supply chain to develop a similar approach.

#### 21. Biodiversity

Suppliers shall adhere to local and international laws, regulations and standards that pertain to biodiversity conservation. We expect our suppliers to 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.



### MANAGEMENT PRACTICES

#### 22. Business Continuity

Suppliers are responsible for the development and implementation of appropriate business continuity plans for operations supporting kp's business.

#### 23. Commitment and Accountability

Suppliers are encouraged to fulfil the requirements described in this Supplier Code by allocating appropriate resources.

#### 24. Confidentiality

Suppliers shall hold kp information in strict confidence and shall not disclose such information to any unauthorised third party.

#### 25. Compliance Assessment

Suppliers are expected to monitor their own compliance with this Supplier Code. kp reserves the right to assess suppliers' compliance with this Supplier Code through use of kp personnel or third parties through audits, inspections or other means.



## Supplier Code of Conduct



### QUESTIONS AND CONCERNS

You should never hesitate to contact kp's Compliance Officer with any questions or inquiries about how this Supplier Code may be relevant to your duties. If you have concerns or become aware of a potential violation of this Supplier Code, please report such concerns and potential violations to kp's Chief Compliance Officer, E-Mail: [compliance@kpfilms.com](mailto:compliance@kpfilms.com).

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	March 2025