



## Supplier Code of Conduct

Ensuring that the principles of sustainable practice are present in our supply chain is important to us at Neuchem. We want to partner with suppliers who operate sustainably and strive to be their best every day. We expect our suppliers to fully comply with all applicable laws and to adhere to internationally recognized human rights as well as environmental, social, and corporate governance standards (“**ESG Standards**”) as particularly outline in international conventions.

We also expect our suppliers to implement these standards in all aspects of their operations, including with their suppliers and subcontractors.

We expect you as our supplier to support, embrace and enact the following ESG Standards, which are based on the ten principles of the United Nations Global Compact initiative, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization, Declaration on Fundamental Principles and Rights at Work, and the global chemical industry’s Responsible Care® program.

### ESG Standards

#### Environment

Our suppliers must:

- Comply with all applicable environmental, occupational health and safety regulations and international conventions on environmental standards.
- Promote the safe and environmentally sound development, manufacturing, transport, use, and disposal of your products.
- Ensure by using appropriate management systems that product quality and safety meet the applicable requirements.
- Protect your employees’ and neighbors’ life and health, as well as the general public at large against hazards inherent in your processes and products.
- Use resources efficiently, apply energy-efficient and environmentally friendly technologies and reduce waste, as well as emissions to air, water, and soil.
- Minimize your negative impact on biodiversity, climate change and water scarcity to protect the livelihood of people.
- Prohibit unlawful eviction and unlawful taking of land, forests, and waters.

## Social

Our suppliers must:

- Ensure that you protect internationally proclaimed human rights in your operations and for your employees, and do not directly or indirectly use forced labor (including, but not limited to, modern slavery and human trafficking) and child labor of any kind, or inputs produced using such labor.
- Uphold the freedom of association and the right to collective bargaining in accordance with applicable laws.
- Treat your employees with respect, promote an inclusive work environment and prohibit discrimination, unequal treatment, harassment, abuse or inhumane treatment against anyone, for example on the grounds of an individual's ethnic descent or national origin, race or color, religion or ideology, gender, sexual orientation, gender identity and/or expression, age, physical or mental disability, political or union affiliation, citizenship, maternity, marital status, or any other characteristic protected by applicable law.
- Support these aspects also in the selection of your suppliers and subcontractors.
- Enable your employees and other stakeholders to report concerns or potentially unlawful practices at the workplace.
- Comply with minimum wages and working hours in accordance with local laws, and ensure compensation of a living wage according to local living conditions.
- Ensure that all security forces for the protection of the enterprise's project comply with applicable laws.
- Ensure that you do not supply products that contain conflict minerals which directly or indirectly finance, or benefit armed groups and cause human rights abuses as outlined in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Countries (OECD DDG). We expect you to fulfill your due diligence on mineral supply chains according to the recommendations outlined in the OECD DDG.

## Governance

Our suppliers must:

- Abide by all applicable national and international trade laws and regulations including but not limited to antitrust, trade controls, and sanction regimes.
- Consider business integrity as the basis of business relationships.
- Prohibit all types of bribery, corruption, and money laundering.
- Forbid gifts to private persons or public officials that aim to influence business decisions or otherwise encourage them to act contrary to their obligations.
- Respect the privacy and confidential information of all your employees and business partners as well as protect data and intellectual property from misuse.

- Implement an appropriate Compliance Management System, which facilitates compliance with applicable laws, regulations, and standards.
- Establish training measures to allow your managers and employees to gain an appropriate level of knowledge and understanding of the content of this Supplier Code of Conduct, the applicable laws and regulations and recognized standards.

You may acknowledge the principles stated above or demonstrate your commitment via compliance with your own code of conduct or company policies that embrace these standards.

Neuchem reserves the right to conduct audits or assessments to ensure your compliance and will take appropriate steps regarding our relationship with you if there is a reason for concern. Neuchem reserves the right to discontinue any relationship for non-adherence to international principles, failure to correct violations, or displaying patterns of non-compliance with these standards.

Should you have any concerns about illegal or improper conduct, please contact [admin@neuchem.com](mailto:admin@neuchem.com) for additional guidance.