



**Reliable. Sustainable. Resourceful.**

# SUPPLIER CODE OF CONDUCT



# At Vynova, we are...



## Reliable

We aim to be a strong and reliable partner for our customers, suppliers and for the communities in which we operate our businesses.

## Sustainable

We embrace sustainability, balancing economic success with social and environmental responsibility.



## Resourceful

Our experienced teams are committed to positively impact our customers' business needs and help them turn challenges into opportunities for growth and innovation.

## Introduction

Vynova understands the social and environmental impacts of its activities and maintains the standards expected of a responsible company. This is achieved internally, and in our dealings with external Suppliers, through the proper conduct of business activities.

Vynova is committed to being a responsible and sustainable business. We aim to conduct our business in accordance with the highest environmental, social and ethical standards and we expect the same from our Suppliers.

Vynova supports the ten principles of the UN Global Compact and the eight fundamental conventions of the International Labour Organization (ILO) and is an active member of the global chemical industry's Responsible Care® Program, Vinyl Plus® and Operation Clean Sweep®. The Vynova Sustainability Report clearly states these targets as well as our efforts and achievements.

This Supplier Code of Conduct establishes the standards we expect all our Suppliers to comply with. We expect our Suppliers to adhere to the ten principles of the UN Global Compact and the eight fundamental conventions of the International Labour Organization (ILO).

Suppliers and any of their subcontractors shall operate in full compliance with the applicable laws and regulations in the countries in which they operate. By applicable laws and regulations, it is understood, but not limited to, internationally recognized laws, pertaining to human rights, workers' rights, ethical and social responsibility, and environmental protection.

We want to partner with our Suppliers to further develop their sustainability performance in our supply chain. We expect our Suppliers to cooperate with Vynova on the topics of circularity and continuous improvement to build an ever more sustainable supply chain.

Vynova may update this Code at any time.



**CONNECT**



**COMMIT**



**IMPROVE**



**RESPECT**



We particularly expect you as our Supplier (“You”) to adhere to the following principles:



## SOCIAL ASPECTS

### Child & Forced Labour

- ✓ You do not engage in or support the use of child labour, in the production or distribution of goods and services.
- ✓ You do not engage in or support the use of forced labour. We will not tolerate any form of slavery, servitude, indenture, debt bondage, involuntary prison, military or compulsory labour or any form of human trafficking in the extended supply chain.

### Diversity, Equity & Inclusion

- ✓ You do not engage in or support discrimination in your activities based on race, ethnicity, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age.
- ✓ You support these aspects also in the selection of your Suppliers and subcontractors.

### Health & Safety & Working Conditions

- ✓ You do not engage in or support the use of corporal punishment, mental or physical coercion, and verbal abuse.
- ✓ You provide a safe and healthy work environment.
- ✓ You respect the rights of employees to join trade unions of their choice and bargain collectively.
- ✓ You comply with applicable laws and industry standards on working hours.
- ✓ You ensure that salaries paid will always meet legal or industry minimum standards.



# ENVIRONMENTAL ASPECTS

## Laws & Regulations

- ✓ You comply with the applicable environmental laws and regulations in the territories within which you operate, including the [REACH Regulation \(EC 1907/2006\)](#) and its subsequent revisions.
- ✓ You possess all the necessary environmental permits and registrations.

## Environmental impact

- ✓ You strive to minimize relevant environmental impacts and bring to an end negative environmental impacts.
- ✓ You maintain a management system which enables you to improve environmental performance.
- ✓ You have procedures in place to prevent incidents – in case incidents occur, you will easily take action to mitigate the consequences that may have an impact on the environment.
- ✓ You encourage the development and diffusion of environmentally friendly technologies.
- ✓ You support Vynova's efforts in the following areas:



### GHG Emissions

You will undertake necessary efforts to actively monitor energy consumption and greenhouse gas emissions, reporting where possible and aiming for reduction year-on-year. You will, where feasible, source from renewable and sustainable energy sources.



### Energy consumption

You will use resources efficiently, apply energy-efficient and environmentally friendly technologies, good agricultural and forestry practices and reduce waste as well as emissions to air, water and soil.



### Circular economy

You will, together with Vynova, support and promote a circular economy where practicable, including natural materials, recycled content, and end-of-life takeback and reuse schemes.



### Hazardous Substances

Chemicals and other materials that pose a hazard to employees, communities or the environment around the operations in question shall be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.



### Water Consumption

You will engage in sustainable and conscious water use practices throughout your operating facilities, aiming to reduce water consumption by implementing where feasible any water saving, conservation and/or substitution measures and technological upgrades.



# BUSINESS ETHICS CRITERIA

## **Fair player**

- ✓ You do not knowingly engage in business associated with any activity that is corrupt or contravenes moral, legal or social codes of practice.
- ✓ You act on the market as an integer and compliant player.
- ✓ You consider business integrity as the basis of business relationships.
- ✓ You comply with all anti-trust or competition laws that guarantee free competition.
- ✓ You are committed to working against all forms of corruption, extortion, fraud and bribery.
- ✓ You forbid gifts to private persons or public officials that aim to influence business decisions or otherwise encourage them to act contrary to their obligations.
- ✓ You operate to the highest standards of ethics and respect the cultural diversity of the markets in which we operate.

## **Data Privacy**

- ✓ You respect the privacy and confidential information of all your employees and business partners as well as protect data and intellectual property from misuse.

## **Conflict Minerals**

- ✓ You 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 of 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 OECG DDG.



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### **Cooperation on EU CSDDD compliance**

Vynova will soon be subject to the requirements of the EU Corporate Sustainability Due Diligence Directive. As such, we expect all our Suppliers and partners to cooperate on the implementation of the Directive, including co-drafting and abiding by any preventive or corrective action plans with respect to potential or actual negative environmental or human rights impacts.

### **Compliance with the Supplier Code of Conduct**

Suppliers shall always ensure compliance with or exceed their obligations as set out in this Supplier Code of Conduct. It is the duty of Vynova to check whether Suppliers abide by the requirements set out above. Upon Vynova's request, Suppliers shall provide evidence of their compliance with the obligations set out in this Supplier Code of Conduct.

You may acknowledge the principles stated above or demonstrate your commitment to this Supplier Code of Conduct via compliance with your own code of conduct which should then be sent to Vynova and receive Vynova's approval.

### **Breach of the Supplier Code of Conduct**

Upon learning of a violation, Vynova has the power to take the following actions, not necessarily in sequence or in this order:

- ✓ Verbal warning
- ✓ Written warning
- ✓ Request and execute an audit at the Supplier's site
- ✓ Suspension of Supplier relationship
- ✓ Termination of Supplier contract (where permitted by law).

### **Grievances**

Individuals or organizations can submit grievances about perceived, suspected or already occurred instances of wrong or unfair treatment, or breach of clauses agreed upon in this Supplier Code of Conduct. They can make use of our Vynova Whistle Blower System (<https://www.vynova-group.com/vynova/compliance>) or directly contact our Group Compliance Manager Elbert Juistenga ([elbert.juistenga@vynova-group.com](mailto:elbert.juistenga@vynova-group.com)) in case there is any perceived or occurred grievance to be reported.

**Supplier approval**

By signing this document, Suppliers undertake to meet the requirements described in this Supplier Code of Conduct and understand that non-compliance may lead to the suspension or termination of their business agreement(s) with Vynova.

We herewith acknowledge the principles stated above and confirm our commitment to this Supplier Code of Conduct.

Signed:

Company stamp:

Date: .....

Name: .....

Company name: .....

Function / Job Title: .....

Signature .....



<b>Version No.</b>	<b>2</b>	<b>Effective Date</b>	<b>September 2024</b>
<b>Supersedes</b>	Vynova Supplier Code of Conduct (version 2019)	Next Review Date	December 2025
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**For any questions regarding this Supplier Code of Conduct, please contact:**

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