

# Supplier Code of Business Integrity



01

# Introduction

For Syensqo integrity is not negotiable: it is the **ONLY** way to do business.

Our employees must act in accordance with the highest ethical and legal standards of our **Code of Business Integrity** and we are determined to work with suppliers who are aligned with our values.

To make our expectations clear, we have created this Supplier Code of Business Integrity which reflects our own ethical standards as well as our commitments to integrating economic, societal and environmental sustainability in all our activities: our **Corporate Social Responsibility Agreements** with IndustriALL Global Union, UN Global Compact, and Responsible Care practices. We intend to strengthen partnerships with our suppliers through transparency, collaboration, innovation, as well as focus on excellence - and the **Supplier Code of Business Integrity** will help us create these closer bonds.

**This Code applies to all Syensqo suppliers of goods or services and all of the suppliers' subcontractors under their control.** It sets forth the minimum requirements of ethical behavior and legal compliance acceptable to be a supplier to Syensqo. We strongly encourage our suppliers to exceed the requirements set out in this Code and to promote best practices as well as continuous improvement.

# Legal Compliance for Business Integrity

Suppliers shall comply with all applicable laws and regulations and conduct their business in an ethical manner.



This includes but is not limited to the following:

- Suppliers shall not engage in or tolerate any form of **Corruption, bribery, extortion, or fraud**. Suppliers shall not use corruption to gain an unfair competitive advantage. "Corruption" means any act that violates any anti-corruption or anti-money laundering laws that govern the jurisdictions in which our suppliers conduct business. Bribery is the offering, giving, soliciting, or receiving of an item of value (or any other advantage) in order to improperly influence the judgment or conduct of a person in a position of authority. Suppliers shall not offer any gifts or other benefits to improperly obtain or retain business.
- **Books and Records:** suppliers must register and provide information in a accurate, clear, and honest manner. The books, records, and accounts must accurately reflect transactions, payments, and events and be in compliance with current laws and generally adopted accounting practices.
- Suppliers shall avoid any situation, which creates an actual or potential **conflict of interest**. As an example, a conflict of interest situation may arise when the supplier is a relative or close friend or acquaintance of the buyer in charge of the supplier. The supplier must disclose any relevant potential or actual conflict of interest immediately to its contact person at Syensqo or to the Syensqo Ethics & Compliance department.
- Suppliers shall compete fairly in accordance with all applicable **competition laws**.
- Suppliers shall observe and support all **laws and regulations** governing the export and import of products, technologies, services, and information throughout the world. In particular, suppliers shall respect all applicable regulations that govern doing business in embargoed countries or with embargoed persons or embargoed organizations.



# Confidentiality

Suppliers are expected to use confidential information and data carefully and appropriately and to protect it.

**Confidential information** shall only be used for the purpose of the execution of the applicable order or contract. Data and information may only be disclosed to the extent necessary for it. In case of doubt, consultation must be sought. Suppliers shall provide all employees with the **appropriate training**.





## 04

# Respect for human rights

Syensqo wants to work with suppliers who share the belief that respect for human rights is in the interest of everyone – individuals, companies, and ultimately society as a whole.



We encourage suppliers to hold themselves to the highest standards in ensuring respect for human rights. This includes but is not limited to the following:

- Suppliers shall avoid any form of child labor. They shall adhere to the legal minimum age requirements as outlined in the relevant **International Labour Organization** ("ILO") conventions and the laws of the countries in which the supplier operates. Suppliers allow no employees under the age of 18 to perform hazardous work.
- Suppliers shall not engage in any form of **forced or compulsory labor**.
- Suppliers shall respect the **personal dignity, privacy, and rights of each individual** employed. Suppliers shall comply with all applicable laws that protect privacy of personal information, including the European Union General Data Protection Regulation and all laws and regulations in the jurisdictions in which Syensqo conducts its business, as amended from time to time.
- Suppliers shall ensure that their employees are **not discriminated against or harassed in any way** on the basis of race, ethnicity, religion, national origin, color, gender, gender identity, sexual orientation, disability, age, political opinion, family status, or any other characteristic protected by law. Discrimination, which is the unfair treatment of employees based on prejudices, will not be tolerated.
- **Working hours** shall comply with the applicable law. In the absence of applicable law or collectively bargained labor agreement, working hours should not exceed 60 hours per week, including overtime, with a minimum of one day of rest per week.
- **Employee compensation** shall meet at least the legal minimums including overtime and be in line with industry standards. Suppliers shall pay all wages earned at regular intervals and inform employees about the method of its calculation. Suppliers shall make no deductions from wages earned, without employee's consent, or if required by law.
- Suppliers shall ensure that employees can **freely communicate** with their managers concerning their working conditions.
- Employees should be **free to join organizations**, such as trade unions, of their own choice, and to refrain from joining such organizations if that is their wish. Suppliers must not threaten or penalize employees for their efforts to organize or bargain collectively where permitted by the laws of the country where the worker is located, nor may they discriminate against employees because of any such organization affiliation.
- Syensqo is concerned that the **trade in certain minerals** commonly known as "conflict minerals" (tantalum, tin, tungsten, gold, and cobalt) mined in regions of the Democratic Republic of the Congo ("DRC") and its adjoining countries (Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia) may be contributing to **human rights abuses**. Suppliers shall fully cooperate in ensuring that Syensqo can responsibly source minerals that do not support conflict or human rights abuses.
- Suppliers shall ensure that their employees can **report any behaviors** that would not be compliant with any of the requirements set forth in the Supplier Code of Business Integrity under their own **Speak Up mechanisms**. In the absence of any internal Speak Up mechanism, Suppliers' employees can always make a report under the Syensqo Speak Up hotline.

# Health and Safety Protection

In all their operations, products and services, suppliers shall protect the health of and minimize risks to the safety of all persons - employees, subcontractors and other individuals including users and the community.



In the workplace in particular, suppliers shall ensure **safe and healthy workplaces** and **working conditions**.

In the event suppliers perform work or services in Syensqo sites, they shall comply with and ensure that their employees comply with all **health, safety, and environmental rules** applicable in that site.

MORE SPECIFICALLY, SUPPLIERS SHALL PROVIDE TO THEIR EMPLOYEES:



Appropriate personal protective equipment



Reasonable access to potable drinking water and sanitary facilities



Adequate lighting and ventilation



Fire safety, emergency preparedness, and response for occupation injury and illness



Industrial hygiene



Machine safeguarding



Appropriate and the minimum legal standards in any canteen or dormitory facility

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06

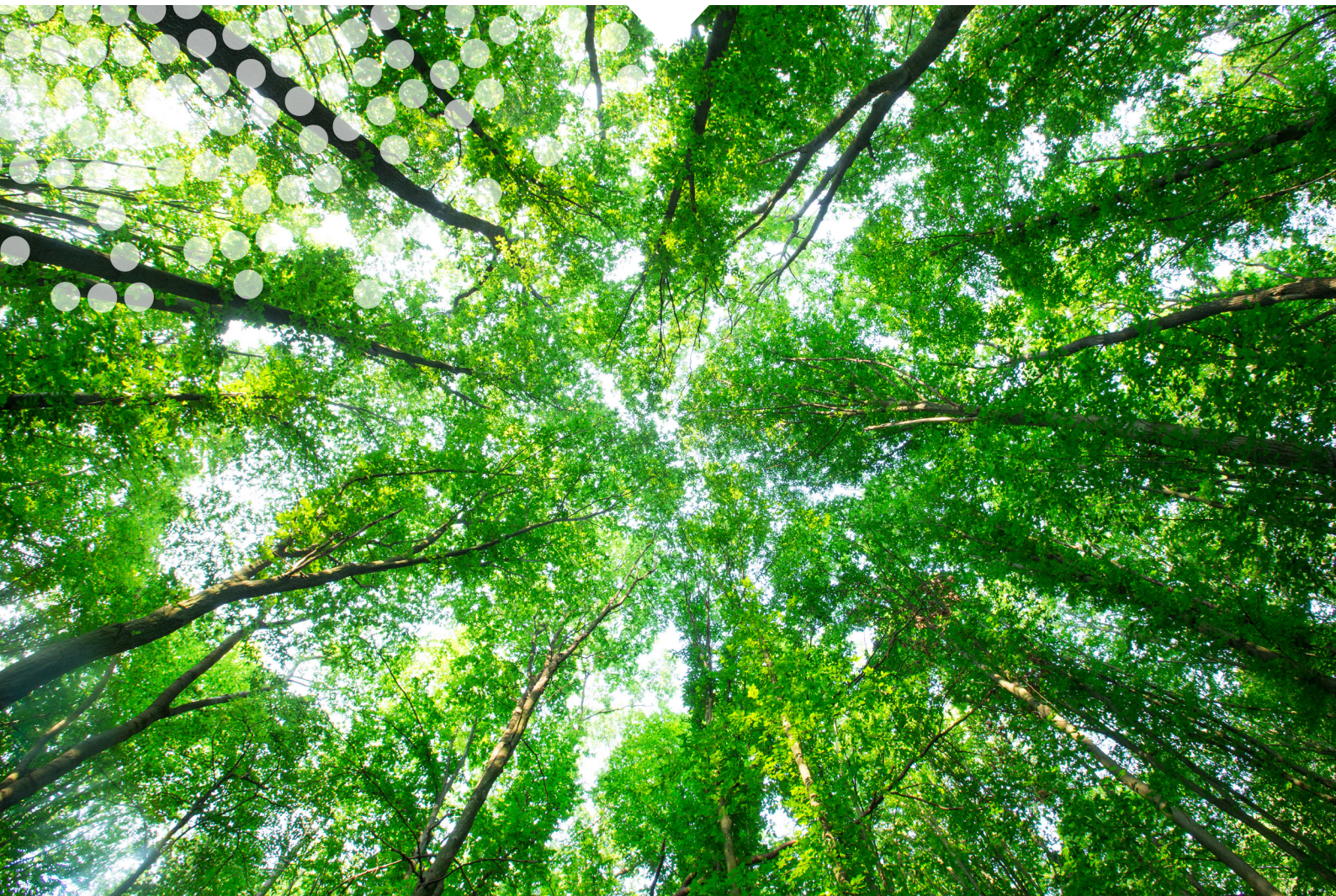
# Environmental Protection

We expect all suppliers in all of their operations, products, and services to minimize the impact on the environment.



This includes but is not limited to the following:

- Suppliers are responsible for managing, measuring, and minimizing the **environmental impact of their facilities and transportations**, including reductions on emissions, waste, energy, and water consumption.
- Suppliers shall comply with all **local regulations** or, in their absence, international standards.
- Suppliers are encouraged to carry out **initiatives** to favor the sustainable use of renewable resources.





07

## Sustainability

Sustainability is an integral part of Syensqo's strategy.



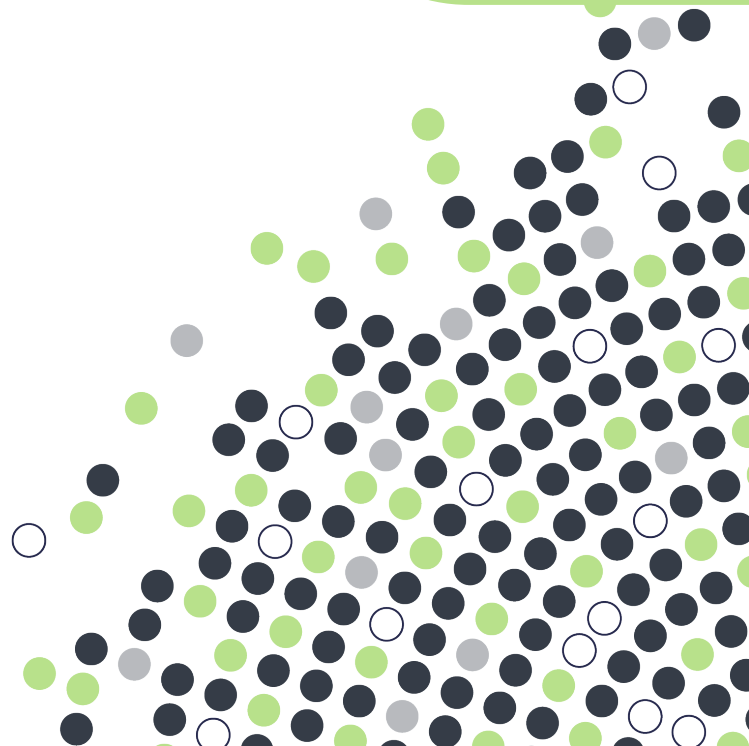
We expect our suppliers to implement the above principles in their own organization and to commit to a **continuous improvement approach**. In order to ensure **compliance with these principles**, Syensqo may request individual suppliers to perform a **third party sustainability assessment** or a **sustainability audit** in function of their risk profile or strategic importance.

## Communication

Suppliers must communicate the provisions of this Code to their employees and subcontractors and must ensure that they comply with the provisions stated herein.



08







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