# Supplier Code of Conduct



Aliaxis and its affiliates globally are focused on and committed to operating in a socially responsible and sustainable way. This supplier code of conduct reflects our values and expectations for our suppliers. Our goal is to partner with companies and organizations that share this same commitment.

Click here to read more about us and our behaviours.

# Compliance with applicable laws and this Code of Conduct

Suppliers shall, always, comply with laws and regulations applicable to their business and this Supplier Code of Conduct. Suppliers shall ensure that their subcontractors comply with the principles described in this Supplier Code of Conduct.

# **Human Rights and Labor**

Respect for people is a core value for Aliaxis. We adhere to the principles of the **International Labor Organization** conventions and expect our suppliers to respect the human rights of their workforce and treat them fairly in accordance with all applicable laws.

Freedom of association	Suppliers shall recognize the freedom of association, meaning the right of workers and employers to freely form or join organizations that promote and defend their interests at work, without interference without any type of repressive action and the right to collective bargaining, meaning the right to a voluntary process through which the Supplier and unions (or workers' representatives) negotiate their relations and interaction at the workplace.
No forced or compulsory labor nor modern slavery	Suppliers shall not use forced or compulsory labor or modern slavery. This means any work or service exacted under menace of any penalty to which a person has not offered himself voluntarily.
No child labor	Suppliers shall not employ children under the age of 15, unless the local law is more stringent, in which case the local higher age limit applies.
No discrimination	Suppliers shall not discriminate based on gender, race, color, religion, ethnic or national origin, sexual orientation, age, disability, union or political membership, family status, or any other classification protected by law.
No harassment	Suppliers shall not tolerate any form of harassment in the work environment, including but not limited to sexual, religious, racial or ethnic harassment, and harassment based on age or disability.
Minimum wage and no excessive working hours	Suppliers shall comply with applicable laws relating to minimum wage and working hours, including offering a rest period of at least 1 day following every 7 consecutive working days. Where local laws do not provide any mandatory rules on minimum wages, Aliaxis requires Suppliers to provide an income that is sufficient to make a living (meaning to pay at minimum for food, housing, education, clothing and basic technology). Such wages must be paid with an agreed regularity (daily, weekly or monthly). The maximum legally allowed working hours must not be exceeded. Where a country does not have such a maximum, Aliaxis requests

that Supplier ensures such maximum does not exceed sixty hours per week.

# Workplace Health, Safety and Impact on Environment

Our commitment to sustainability includes safe and healthy workplaces, respect for the environment and efficient use of resources. Aliaxis encourages suppliers to take action against climate change, to avoid the use of environmentally hazardous materials and to engage in activities that increase material circularity like reuse and recycling.

, ,	Based on prevailing industry standards, Suppliers shall provide and maintain a safe, clean, and healthy workplace. This includes implementing safety procedures and training that eliminates most risks or manages the residual risk in order to mitigate their impacts, that are likely to cause injury, illness, or death to their workforce and to members of the public.
Respect for the environment	Suppliers shall comply with relevant environmental laws, rules and regulations and ensure that they obtain and maintain necessary permits, licenses, and related reporting, and fulfill any other legal requirements. Suppliers shall minimize the impact on the environment in terms of waste, emissions, spills, releases, and noise

**Efficient use of resources** 

Suppliers shall commit to the environmentally responsible and efficient use of raw materials, energy and other natural resources.

#### **Business Ethics**

Aliaxis requires that you comply with the below business ethics obligations. Any deviation must be immediately reported to Aliaxis via its Global Alert Channel tool (see below).

- based on prevailing industry standards.

No Bribery	Suppliers will not engage " <b>bribery</b> " meaning in any form of unethical business practice, including but not limited to, making, offering, promising, accepting, or authorizing bribes and/or facilitation payments to government officials, politically exposed persons ("PEP") or to anyone else. <b>Facilitation payments</b> consist of small unofficial payments made to expedite or secure routine governmental action, are also prohibited, no matter if they are allowed by local laws.
Conflict of interest	A "conflict of interest" occurs when the Aliaxis' employee engaging with the supplier has a private interest which interferes in any way, or even appears to interfere, with the interests of the Group. Any potential conflict of interest should be disclosed by the Supplier directly to their procurement contact at Aliaxis, via the Supplier onboarding documents, or suppliers.channel@aliaxis.com.
Competition / antitrust	Suppliers will not participate in anti-competitive practices such as cartels, market allocation, etc.
<b>Business Courtesies</b>	Suppliers shall not offer any gifts, favors or entertainment to Aliaxis' employees unless these are of limited value and not aimed at influencing business decisions. Supplier is informed that accepting Gifts and Hospitality by Aliaxis employees is subject to prior approval within Aliaxis.
Accurate Business Records	Suppliers shall keep accurate, complete, and up-to-date records of their transactions with Aliaxis and ensure retention in accordance with applicable laws.
No Fraud	Suppliers must have internal controls designed to detect, prevent, and respond to fraud. Any potential fraud that may have an impact on Aliaxis, financially, reputationally or otherwise, must be reported to Aliaxis.
International Trade	Supplier shall comply with applicable trade sanctions, imports and export controls, customs embargoes and other related laws and regulations of similar nature.  Suppliers shall provide all relevant information and documentation on the goods and/or services supplied to Aliaxis (such as country of origin). Supplier shall not work with sanctioned persons or entities. Supplier guarantees that no "dual-use item" shall be provided to Aliaxis without the Supplier explicitly informing Aliaxis in advance of such classification and complying with the applicable laws and regulations.

**Training** 

Supplier confirms it has established procedures, regular trainings and controls to ensure compliance with the obligations in the Supplier Code of Conduct or with similar obligations no less stringent and agrees to provide Aliaxis with information necessary to confirm compliance.

Confidentiality & Privacy

Suppliers shall keep confidential and use Aliaxis data (including personal data / information) only for the purpose of their business with Aliaxis and for no other purpose, in compliance with the applicable laws and regulations. Supplier shall take appropriate measures to protect the confidentiality of Aliaxis data from unauthorized disclosure or use.

## **Conflict Mineral Sourcing**

Suppliers confirm that they comply with applicable national and international laws and regulations regarding conflict minerals (tin, tungsten, tantalum and gold or any other material that is designated as a "conflict mineral"). Applicable laws and regulations include but are not limited to, in Europe, Regulation EU n° 2017/821 regarding conflict minerals and, in the United States, Section 1502 of the Dodd Frank Act.

Suppliers shall regularly exercise due diligence on the source of such minerals and therefore require the same from their own suppliers. Suppliers shall retain appropriate evidence of such due diligence and share this information with Aliaxis, upon request.

## **Intellectual Property**

Supplier acknowledges that any Aliaxis **Intellectual Property** of any nature (patents, trademarks, drawings/designs, logos, domain names, trade secrets, know-how, software etc.) belongs to Aliaxis only, and that no implicit user licenses are granted. Supplier shall not attempt to register any intellectual property owned or used by Aliaxis to commercialize its products or its services. Supplier shall not sell, directly or indirectly, counterfeit Aliaxis products, and shall make Aliaxis aware of any counterfeit product as soon as Supplier becomes aware of such products

#### **Aliaxis Global Alert Channel**

Any violation of this Code should be reported to Aliaxis immediately via Aliaxis Global Alert Channel accessible via https://aliaxis.whispli.com/alertchannel or by scanning the below QR code:



Violations that can be remedied will be addressed in partnership with the Supplier and may require an audit. Should Aliaxis and the Supplier not find adequate remedies to noncompliance, **Aliaxis may, at its sole discretion, terminate the business relationship**, and reserves any and all rights to file appropriate claims.

### **Version updates of this Code**

The present Code is version 3.0. Aliaxis regularly reviews and updates its Supplier Code. Supplier is required to regularly check the Aliaxis website to ensure it is aware and complies with the latest version of the Code.

(latest review: June 2025)