



*MANAGEMENT SYSTEM/
СИСТЕМА МЕНЕДЖМЕНТУ
Supplier code of conduct /
Кодекс поведінки постачальника*

Supplier code of conduct / Кодекс поведінки постачальника	Edited by/ Створено OV/ OB	Approved by/ Затверджено TC/ TK	Issued/ Редаговано 200517	Page/ Сторінки 1/5
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Supplier Code of Conduct and Responsible sourcing of raw materials for Trox Group (“Supplier code”)

Valid for Trox Group, i.e. all companies owned by Trox AB including but not limited Trox Ukraine LLC and Trox BR in Moldavia.

Purpose

The purpose of this document is to clearly communicate how all activities shall be conducted towards our suppliers and service partners within Trox Group and its subsidiaries in order to ensure compliance with relevant legislation and good ethical business practice.

Who the code applies to (“applicability”)

The guidelines are valid for all suppliers to Trox AB and its subsidiaries.

This Supplier code applies to providers of goods and services – and their employees – in their work with Trox through a contractual agreement. It is not applicable to single transactions such as a taxi ride, dinner at a restaurant, purchasing a railway ticket, or any similar type of transaction not subject to a frame agreement. The companies that we collectively call “suppliers” includes suppliers, subcontractors, service providers, consultants, intermediaries and agents. As a supplier, you are expected that practices and principles outlined in this document are followed.

General

Trox strives to achieve beneficial supplier relationships built on common values and expected behaviors. The Trox Ethical Guidelines outlines the behaviors we expect from our employees. The Trox Supplier Code of Conduct contains relevant portions of our Ethical Guidelines that apply to supplier as an important part of our supply chain. We encourage our suppliers to engage in constructive dialogue with us regarding this document and doing business together.

Successful businesses are profoundly dependent on confidence and a good reputation. Trox will act responsibly and sincerely towards its business associates and society at large and our suppliers are expected to do the same.

Compliance with laws

Suppliers are required to comply with all applicable laws and with this document, including when the document sets a higher standard than, but does not conflict with, legal requirements. Customs or local practices never take precedence over legal requirements.



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Reporting misconduct

Trox believes that employees feel free to report instances of non-compliance with our Ethical guidelines or this document. Such non-compliance might include suspected illegal or unethical conduct. Trox is committed to investigating reports of suspected or known misconduct, and to taking appropriate action based on our findings. Similarly, Suppliers – including your employees and your supply chain – are obligated to report to us suspected or known misconduct to a relevant Trox manager. If you prefer, you may report suspected or known misconduct directly to the CEO or the Chairman of Trox AB.

No retaliation

Trox does not retaliate against anyone for submitting in good faith a report of suspected or known misconduct, nor do we tolerate others retaliating. Similarly, you must not retaliate or tolerate retaliation against anyone who, in good faith, reports suspected or known misconduct. Accordingly, supplier must cooperate by providing relevant information, and by making individuals accessible so Trox can conduct a meaningful audit. Similarly, you are required to evaluate your supply chain to ensure compliance with the Supplier Code. Any non-compliance by you or your supply chain must be effectively remediated both in a timely manner and at no additional cost to us or our customers. Breaches of the Supplier code may negatively impact your business relationship with Trox. Potential consequences may include but are not limited to contract termination.

Health, safety and well-being

You as a supplier care for our people and the people affected by our workplaces, and we continuously strive to develop a work environment that promotes health, safety and well-being. You work with health and safety performance, with continuous, measurable improvements towards a goal of an injury-free environment.

Fair working conditions

You as supplier support recognized global human rights and fair working conditions for persons working on our projects, in our workplaces, and in our supply chain. You ensure that working conditions, hours, wages and benefits comply with applicable national and local laws and relevant ILO conventions. You have zero tolerance for any form of human trafficking or child, forced or compulsory labor, including such practices as the unlawful or illegitimate withholding of wages. You do not allow any practice that would restrict free movement of employees. You recognize and



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respect employees' right to freedom of association and collective bargaining, where permissible by law.

No discrimination or harassment

You as supplier, respect all individuals and strive to work as one team, and to foster open, straightforward and respectful communication. You provide equal treatment and employment opportunities, and we do not tolerate any form of harassment or discrimination.

Climate and Environment

You as Supplier, is committed to protecting the environment and believe that we can make major contributions to a more sustainable world. You actively work to improve the environmental performance of our and your operations, projects, products and services during their entire life cycles. You conduct your operations in an environmentally responsible manner and in accordance with applicable environmental laws. You strive to reduce the improve water and air quality and reduce water and energy consumption. You as Supplier also strives to reduce the emission of greenhouse emissions and reduce usage of natural resources and reduce waste from your processes (e.g. reducing scrap in production processes).

Protection of assets, property and equipment, intellectual property

You as Supplier, safeguard and protect our assets from damage, theft, loss and misuse, as they are essential to our business. Assets are either tangible or intangible. Examples of tangible assets are raw materials, money, products, machines and equipment, computers and real estate. Examples of intangible assets are our brand, patents, trademarks, knowhow, trade secrets and copyrights. Trox does not accept usage of counterfeit parts or software nor violations of intellectual property of our stakeholders.

Confidentiality

You as Supplier, respect confidential information relating to Trox and its stakeholders, and take all reasonable measures to prevent confidential information from being disclosed to any person who does not need and have a right to that information in the course of their work. Separate confidentiality agreements may also apply.

Privacy and Protection of personal data (data protection)

You as Supplier, respect everyone's right to the protection of his or her personal data and the right to his/her integrity in connection with processing of personal data. The definition of personal data, and



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the legal requirements for safeguarding it, vary by country. It could include someone's names, personal healthcare information, photographs or identity number. Everyone has the right to be treated with respect and dignity. In turn, you should respect the dignity, privacy and rights of everyone you interact with and those affected by your business operations.

Anti-corruption and anti-bribery

You as Supplier, is committed to conducting business with a high level of integrity, and we do not tolerate any form of bribery or corruption, including money laundering, kickbacks, extortion, fraud, nepotism (family) or cronyism (friends). You never request, accept, pay, offer or authorize bribes, either directly or indirectly, under any circumstances. This includes never seeking to improperly influence or bribe a Trox employee, customer, or public official (including foreign public officials) or any other individual or entity.

Disclosure of information and financial responsibility

You as Supplier ensure all reports, records, drawings and invoices are complete and accurate and not false or misleading. Financial records should be the complete and accurate nature of all financial transactions in accordance with locally accepted accounting principles and relevant Trox policies and rules. This also applies to accurate maintenance of non-financial records, including for quality, safety, health, environment, human resources, time or salary sheets.

Fair competition

You as Supplier, believe fair competition benefits Trox, our stakeholders and society as it drives efficiency and innovation, which are the basis of a well-functioning market economy. You are committed to fair competition and do not tolerate any violation of antitrust laws, competition laws or related regulations. You do not participate in bid rigging or other mechanisms that limit fair competition in tender situations. You do not participate in any other form of cartel practices with competitors, such as dividing or allocating markets or customers or price fixing.

Conflict of interest

You as Supplier and your employees, are all responsible for making decisions in the best interest of that employer or party without regard for personal gain. Conflicts of interest can be rooted in hospitality and entertainment, gifts, charitable contributions, political contributions, sponsorships and close personal relationships. You strive to operate in a way conflicts of interests are actively avoided, and Trox require our supply chain to do the same.

Hospitality and gifts



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You as Supplier, does not offer or accept hospitality or gifts that may improperly influence – or create the appearance of improperly influencing – your business decisions or those of Trox, our customers or others. You respect and observe the hospitality and gifts policy of Trod with which you are working. If a Trox employee requests any type of hospitality, gift or personal service for free or at less than fair market value, you report it directly to Trox.

Sanctions

You as Supplier, follow sanctions or other legal instruments (e.g. export controls) used by governments and multinational bodies to influence foreign policy by prohibiting business dealings with certain countries, individuals, entities or sectors. Sanctions lists are maintained by the United Nations, the EU, and the United States among others and should be followed. You report to Trox if you have questions or concerns regarding sanctions laws and regulations.

Sustainable raw materials

Trox expects its suppliers to avoid all minerals from conflict affected areas. Minerals are defined as conflict affected, if the mining or subsequent processing or export supports armed, nonstate groups, directly or indirectly. Information regarding suppliers or sub-suppliers for minerals, e.g. tin, tungsten, gold or tantalum, must be disclosed to Trox upon request.

In cases of suspicion, Trox expects its suppliers to disclose the origin of materials, which are connected to potential human rights and other legal violations. These expectations especially apply to raw material mining and extraction of rare minerals. As of the date when this document is approved, Trox is not aware of any usage of conflict affected minerals in its supply chain.

Revised 2020-05-17, approved by Thomas Comstedt