

# Supplier Code of Conduct

## Purpose of the Supplier Code of Conduct

This Supplier Code of Conduct has been created for the purpose of ensuring that our Suppliers abide by the Flint Group Code of Conduct, provide safe working conditions for their employees and treat them with respect. Their production processes should be responsible and environmentally friendly.

The Supplier Code of Conduct reflects internationally accepted standards of social and environmental responsibility in addition to our company's high expectations for ethical business behaviour. We relied on a number of sources to develop our Supplier Code of Conduct including the Universal Declaration of Human Rights, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization's core conventions, the OECD guidelines for Multinational Enterprises on Responsible Business Conduct, ISO 14001 and our industry representative organisation.

We expect our Suppliers to apply the same principles to their distributors and sub-contractors if they provide goods and/or services to Flint Group.

## Our Commitment to Suppliers

Flint Group seeks to engage in relationships with Suppliers that are socially responsible, behave with integrity and focus on sustainable development. Our goal is to partner with Suppliers who demonstrate sustainable and ethical business practices.

## Our Expectation of Suppliers

### a) Business Integrity & Standards

#### **Laws, regulations and trade control**

Suppliers must comply with all relevant laws and legislation issued by the country of their domicile, the United Nations, the European Union and the United States. Suppliers shall under no circumstances export or import goods in violation of applicable laws and regulations. Suppliers shall complete and maintain accurate documentation of product country

of origin, tariff classification and value of imported and exported items.

#### **Competition and anti-trust laws**

We expect our Suppliers to respect anti-trust laws and refuse any agreement with a competitor concerning prices, costs, terms, customers, markets, production, business plans or any other matter that could affect competition. An unspoken agreement to fix prices or allocate markets is just as illegal as a spoken or written agreement.

#### **Bribery and Corruption**

Suppliers shall understand that offering, giving, receiving or soliciting something of value in order to unfairly influence a business action or decision is considered by Flint Group as a bribery. Flint Group maintains a dedicated [Anti-Bribery and Corruption \(ABC\) Policy](#). Suppliers are expected to implement equivalent controls within their own operations.

#### **Conflicts of interest**

Conflicts of interest may involve (among other things) an acceptance of personal benefits, from a person or organisation dealing, or expecting to deal, with Flint Group in any type of business transaction. Suppliers' decisions shall not be influenced, or perceived to be influenced, by any personal or private opportunities or relationships, potential financial gain or other benefit.

#### **Gifts and entertainment**

We expect our Suppliers to respect that gifts and entertainment given and received as a reward or encouragement for preferential treatment are not allowed. In certain circumstances, the giving and receiving of modest gifts and entertainment is acceptable. Nonetheless, depending on their size, frequency and the circumstances in which they are given, they may constitute bribes, political payments or undue influence.

#### **Business records and confidential information**

We expect Suppliers to keep accurate and up-to-date records of matters related to their business with Flint Group and to demonstrate compliance with applicable laws and regulations.

Flint Group believes its proprietary information is an important asset in the operations of its business and prohibits the unauthorised use or disclosure of this information.

### **Cybersecurity**

Suppliers shall comply with applicable cybersecurity laws and regulations. Suppliers shall implement appropriate cybersecurity and data protection measures to ensure the confidentiality, integrity and availability of their IT systems and the data they process. This includes protection against cyber threats, loss of sensitive data, secure access controls, regular system monitoring and prompt reporting of significant incidents. Suppliers must take reasonable steps to safeguard any Flint Group data they access and to prevent unauthorised disclosure, loss or alteration.

## b) **Human Rights and Labour Standards**

Suppliers must commit to upholding the human rights of workers and to treating them with dignity and respect. Standards are set for working hours, wages and benefits, and freedom of association.

### **Child labour**

Flint Group recognises the rights of every child to be protected from economic exploitation and complies with the laws of each country in which it operates in regards to minimum hiring age for employees.

### **Forced labour**

Suppliers shall not use work that is performed involuntarily under the threat of penalty, dismissal or denunciation to authorities or as a disciplinary measure or for failure to meet production quotas.

### **Freedom of Association and collective bargaining**

Suppliers shall not interfere with employees' freedom of association and collective bargaining that are in accordance with applicable laws and regulations.

### **Non-discrimination**

Flint Group does not discriminate against anyone on the basis of any characteristic protected by applicable law, but shall always, where such action is not addressed or foreseen otherwise by applicable laws, ensure that no discrimination occurs based on race, creed, disability, gender, marital or maternity status, religious or political beliefs, age or sexual orientation. We expect our Suppliers to share this policy.

### **Abuse and harassment of labour**

Suppliers must strictly prohibit any kind of harassment, intimidation, bullying or abuse of any

employee, including through the threat of physical punishment or disciplinary action, or physically, sexually, racially, psychologically or verbally.

### **Wages and benefits**

Flint Group complies with applicable employment laws, regulations and industry standards in each country in which it provides employment. Suppliers shall ensure employees are paid a fair wage according to at least the legal minimum standards or appropriate industry standards, whichever is higher.

### **Working hours**

We expect Suppliers to ensure employees do not work excessive hours, in accordance with national laws, collective agreements and the provisions of the relevant local standards on working time.

### **Due Diligence**

Suppliers are expected to conduct human-rights due diligence to identify, prevent and mitigate potential adverse impacts in their operations and supply chains.

## c) **Health & Safety Standards**

### **Health and safety policy**

Suppliers shall have a clear, publicly-available health and safety policy statement in place, be committed to developing and applying appropriate health and safety management systems and to monitor and report corrective actions against incidents.

### **Safe working environment**

Suppliers will maintain a safe, healthy, clean and well-lit work environment including appropriate and adequate facilities and protection from hazardous materials or conditions.

### **WASH principles**

Suppliers shall provide their employees with access to sanitation and drinking water, and promote hygiene practices.

## d) **Responsible Sourcing**

### **Environmental impact**

Suppliers are expected to demonstrate environmental responsibility by minimizing any adverse effects from their operations on the community, environment and

natural resources. All required permits, registrations and reporting are to be obtained, maintained and kept current.

### **Conflict minerals**

Suppliers must comply with all applicable conflict mineral laws and use reasonable endeavours to ensure that any goods supplied to Flint Group do not contain any “conflict minerals” (including, but not limited to, tin, tantalum, gold and tungsten) which are sourced directly or indirectly from any country that is subject to restrictions pursuant to conflict mineral laws or equivalent.

## **Raising a concern**

We set high ethical standards for our Suppliers, consistent with our company’s culture.

We expect our Suppliers to raise any concerns about our business conduct or a potential breach of this Supplier Code of Conduct or our Flint Group Code of Conduct, directly with their contact in Flint Group. If a Supplier prefers, a concern can also be raised through our Flint Group Ethics Point. Ethics Point is a confidential service for employees and third parties (including Suppliers) that is managed by an external company, independent of Flint Group, with trained staff able to deal with calls in local languages. Ethics Point is available via telephone, email or internet, 24 hours a day, 7 days a week.

Contact details for Ethics Point are as follows:

<http://www.flintgrp.ethicspoint.com>