

## **Supplier Code of Conduct**

This Supplier Code of Conduct applies to the current and future suppliers of ERCO Worldwide LP, and of its US and Chile based subsidiaries, including International Dioxide Inc. (collectively, "ERCO").

ERCO believes in conducting business with honesty and integrity, treating all people with dignity and respect, supporting our communities and honouring the laws and regulations of the countries in which we operate.

In selecting its suppliers, ERCO endeavors to choose reputable business partners who conduct their business in a manner that shows commitment to high ethical standards, safe and healthy working environments, protection of human rights and dignity, protection of the environment and compliance with laws and regulations.

ERCO is a founding member of the voluntary Responsible Care® initiative of the chemical industry, according to which companies work together to continuously improve their performance in the areas of health and safety and the environment. ERCO is registered to ISO Product Quality Standards.

This Supplier Code of Conduct ("Code") outlines our expectations regarding the workplace standards and business practices of our current and future suppliers.

The expectations contained in this Code are factors essential to our decision whether to enter into or continue existing business relationships. Each supplier is responsible for ensuring that its employees, representatives and subcontractors understand and comply with this Code.

The expectations outlined in this Code do not replace specific requirements in contracts. This Code is intended to supplement the specific requirements in contracts. If a contractual term is stricter than this Code, the supplier must meet the stricter contractual requirement.

This Code is focused on principles that uphold consistent compliance throughout our global operations. Suppliers are also expected to comply with all laws and regulations of the countries in which they operate; however, within the scope of such compliance, where local or regional laws are less restrictive than the principles of this Code, we expect our suppliers to follow this Code.

### **Workplace, Labour & Human Rights**

#### ***Respect and Dignity***

Suppliers are expected to keep their workplaces free of harassment and discrimination.

#### ***Diversity and Inclusion***

ERCO is committed to equal opportunity and does not tolerate discrimination or harassment on the basis of race, sex, ethnicity, religion, age, disability, sexual orientation, gender identification, political opinion(s), or any other grounds protected under applicable human rights laws.

#### ***Wages and Benefits***

Suppliers must follow all laws governing wages and working

hours, including compensation, benefits and overtime.

#### ***Freedom of Association***

Suppliers must respect the right of their employees to join or not to join any lawful association without fear of retaliation.

#### ***Employment Eligibility & Voluntary Labour***

Suppliers shall only employ workers with a legal right to work, with the minimum working age not being less than the minimum age under applicable laws and jurisdictions less than 18 years of age for positions in which hazardous work is required and shall comply with minimum age work requirements in the jurisdictions in which they operate. We

prohibit the use, and are committed to the elimination of, all forms of child/forced labour, slavery, and any forms of human trafficking.

### **Business Conduct & Ethics**

#### ***Illegal Payments, Corruption and Bribes***

Suppliers must not engage in illegal payments or corruption or tolerate the offer of gifts, favours or entertainment where they are intended — or appear intended — to obligate the receiver. Suppliers must not participate in extortion, fraud, embezzlement, bribery or kickbacks.

#### ***Conflicts of Interest***

Suppliers shall disclose to ERCO any potential conflict of interest, such as when one of

their employees (or someone close to the employee) has a relationship with an ERCO employee who can make decisions that will affect the Supplier's business — or when an ERCO employee has any kind of interest in the Supplier's business.

### ***Securities and Insider Trading***

If a Supplier learns of any material non-public information while working for ERCO, they must not share that information with others or use it for market trading.

### ***Antitrust and Competition Laws***

ERCO expects its Supplier to comply with antitrust laws. They must avoid agreements or actions that illegally limit trade or competition. They may not offer our employees any confidential information about an ERCO competitor.

### ***Gift-Giving and Political Contributions***

Bribes or inappropriate, lavish or repeated gifts to ERCO employees are forbidden, regardless of local custom. "Lavish" means a gift or favour having more than a nominal value. Donations made to ERCO for charitable programs endorsed by ERCO's President are permitted.

### ***Intellectual Property and Data Privacy***

Suppliers must protect all of ERCO's intellectual property rights, trade secrets and proprietary information. They must also protect personally identifiable information that they keep for ERCO from unauthorized access, destruction, changes, use and disclosure.

### **International Trade Law Compliance**

ERCO is committed to compliance with all relevant trade laws and regulations in every jurisdiction in which we conduct business. This includes laws governing imports, export controls, embargoes, and sanctions. Additionally, suppliers shall disclose any information to companies or individuals regarding changes in export regulations/classifications that may impact the transfer of products/services.

### **Health Safety and Environment**

#### ***Workplace Health and Safety***

We expect suppliers to promote secure, safe and healthy work sites including when at ERCO locations. Failure to adhere to all safety and security guidelines may result in the expulsion from ERCO sites. Suppliers should have everything in place that is needed to reduce the risk of accidents, injuries and exposure — especially where hazardous materials are present. They must have well-established safety procedures, preventative maintenance and protective equipment, all in compliance with applicable laws and regulations related to health, safety and workplace hazards.

#### ***Environmental Sustainability***

Suppliers must comply with all environmental laws, including those relating to hazardous materials, wastewater, solid waste and air emissions. We encourage suppliers to reduce the environmental impact of their operations and safeguard the natural resources on which we all depend, especially through reasonable efforts to reduce or eliminate waste of all types.

### **Accountability, Quality and Compliance**

Suppliers are expected to implement management systems to facilitate compliance with all applicable laws and regulations and to promote continuous improvement with respect to the expectations set forth in this Supplier Code of Conduct. Suppliers shall be responsible for any monitoring or documenting of their compliance and their efforts to promote compliance within their supply chains. Furthermore, Suppliers will establish and maintain a certifiable quality program. ERCO reserves the right to investigate any instances of a Supplier's non-compliance of which it becomes aware. Non-compliance may be grounds for ERCO to void or terminate contractual obligations with a Supplier.

### ***Legal and Other Requirements***

Suppliers will comply with all applicable laws, regulations, contractual agreements and generally recognized standards in the industry in which they operate.

### **Communication of Sustainability Criteria in Supply Chain**

Suppliers will communicate the principles set forth in this Supplier Code of Conduct to their supply chain.

### ***Risk Management***

Suppliers are expected to implement mechanisms to identify, determine and manage risks in all areas addressed by this Code.

### ***Documentation***

Suppliers are expected to develop adequate documentation to demonstrate

that they share the principles and values expressed in this Code. ERCO has the right to review or audit compliance.

### ***Training and Competency***

Suppliers will establish appropriate training measures to allow their managers and employees to gain an appropriate level of knowledge and understanding of the contents of this Code, as well as to ensure an appropriate level of knowledge and understanding of all applicable laws, regulations, and generally recognized standards applicable to the performance of their work for ERCO.

### ***Continuous Improvement***

Suppliers are expected to continuously improve their efficiency, sustainability and quality performance by implementing continuous improvement measures.

### **Reporting Violations**

It is the responsibility of each of us to report any suspected violations of this Code. It is our policy not to allow retaliation for reports of misconduct made in good faith. Any suspected violations of this code can be reported to an ERCO employee, who will initiate further escalation and investigation as necessary.

If you prefer, you may report through an independent, interactive telephone service provider in accordance with the [Reporting and Whistleblower Policy](#), as follows. Reporting may be made anonymously to the third-party company designate on a secure, confidential and anonymous basis.

**Web intake site:** [Web Report](#)

**Mobile intake site:** [Mobile Report](#)

**QR code:**



**Toll Free Canada & USA:** 833-778-1563

**Toll Free Chile:** Dial 800-225-288 (Claro), 800-360-312 or 800-360-311 (ENTEL), or 800-800-288 (Telefonica), then dial 833-778-1563

### **Contact Information**

Any questions regarding this Supplier Code of Conduct should be directed to your usual ERCO procurement contact or [coupaonboarding@ercoworldwide.com](mailto:coupaonboarding@ercoworldwide.com)