

Nomeco Supplier Code of Conduct 2023

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PHOENIX group General Procurement Supplier Code of Conduct

This General Procurement Supplier Code of Conduct (GP SCoC) sets out the minimal standards with regards to becoming a PHOENIX group company supplier. For suppliers operating in certain PHOENIX countries, additional requirements not contained in this document may apply. Such information will be provided separately.

PHOENIX seeks to comply with all laws, regulations, and guiding principles applicable within the European Union and within the individual countries in which we operate. PHOENIX expects the same from its business partners.

To ensure a consistent group-wide approach, doing business with a PHOENIX group company requires compliance with this GP SCoC and with national legislation. Our suppliers must be aware of applicable legislation of the countries in which they are seated and in which they operate and adhere to such legislation as a minimum requirement. Applicable legislation takes precedence should it conflict with any condition imposed by the GP SCoC. In such cases, the supplier must inform us immediately.

There is a supplier evaluation and selection process for all PHOENIX group general procurement spending. In this process, we assess and select suppliers based not only on the usual criteria of service level, quality, and commercial performance, but also on their commitment to meet the goals and objectives set out in this GP SCoC.

1. Ethical standards

The PHOENIX group corporate mission statement describes the values the group is committed to related to the sustainable development of the organization over and above the regulatory standards. Ethical and fair dealing with business partners, competitors, and our employees is a core principle of our organization. The supplier must therefore support our group values and, in addition, uphold the principles of the United Nations' Universal Declaration of Human Rights in accordance with applicable law and practice. This especially applies to:

Child labour

The minimum age for admission to employment or work shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years. Therefore the supplier may not employ children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted if it in any way hinders the child from completing their compulsory schooling or training, or if such employment is harmful to their health or development. The minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of young persons shall not be less than 18 years. (ILO Minimum Age Convention, 1973 (No. 138))

Forced labour

The supplier as well as its subsidiaries and partners may not make use of forced or compulsory labour. Workers shall not be required to hand over their identity papers to secure employment unless required to do so by law. If this is the case, employees shall have access to their papers at all times. Workers shall be free to leave their jobs, after reasonable notice, and are paid on time and in full for the work they have done prior to leaving.

Compensation and working hours

The supplier must comply with the respective national laws and regulations regarding working hours, wages, and benefits. Suppliers shall commit to providing reasonable working hours. Total working hours shall not regularly exceed 60hrs per week. Working hours excluding overtime shall not regularly exceed 48hrs and overtime shall not regularly exceed 12hrs per week. Workers shall be paid on time and in full according to applicable wage laws including minimum wages, overtime and mandated benefits. Overtime shall be infrequent, voluntary and compensated at a higher rate unless otherwise stipulated by applicable law.

Discrimination

The supplier may not discriminate against anyone on the basis of race, religion, political affiliation, disability, age, sexual orientation, or gender.

Equal opportunities

Suppliers shall seek to obtain equal opportunities for all employees. Supplier shall commit to provide clear and fair terms of employment, which aims to ensure equality and diversity for all present and potential employees. Suppliers are encouraged by this Code of Conduct to have a risk analysis on DEI and human rights, containing actions, measures and opportunities in the pursue to obtain equal opportunities.

Freedom of association and the right to collective bargaining

Employees shall be free to exercise their legal rights to join, form, or work for organizations that represent their interests as employees. The supplier may not threaten, penalize, or restrict workers – or interfere with them in any other way – for legally and peacefully exercising their rights. The supplier shall respect employees' rights to collective bargaining.

2. Health and safety

The PHOENIX group Code of Conduct ensures that all PHOENIX group employees work in a healthy and safe environment. We therefore expect the supplier to do their utmost to implement high standards of occupational health and safety. The supplier must comply with the applicable occupational health and safety regulations of the areas in which they operate and provide a work environment that is safe and conducive to good health in order to preserve the well-being of employees and to prevent accidents, injuries, and work-related illnesses. This includes, but does not limit to, that suppliers shall identify and assess emergency and hazardous situations in the workplace, and any company provided living quarters and minimize their impact of any emergency by implementing emergency plans and response procedures.

3. Anti-corruption and competition compliance

The supplier must comply with the PHOENIX group anti-corruption and competition compliance policies, as well as applicable local anti-corruption and bribery laws. In particular, the supplier may not offer inappropriate services, gifts, loans, cash, cheques, invitations, or other benefits to third parties, including PHOENIX group employees, in order to influence the conduct of employees representing PHOENIX group. Suppliers shall declare any conflict of interest that may affect the performance of tasks or provision of services.

4. Environment

PHOENIX group works actively to reduce its direct and indirect impact on the environment and has enshrined its commitment to protecting it in its Code of Conduct. The supplier is expected to adhere to our environmental strategy and must therefore be well informed of and comply with our requirements in accordance with national legislation, regulations, and industry standards. As a minimum it is expected that suppliers shall take measures to improve efficiency and reduce the consumption of all kinds of resources. Suppliers shall take measures to identify sources of sustainable materials and to incorporate them into products supplied. Where feasible, suppliers shall provide eco-labels or equivalent certifications for these materials. Further suppliers shall reuse or recycle any waste when it is environmentally favorable and technically feasible to do so. Suppliers shall actively work toward increasing their use of renewable energy, lowering their emissions and have a climate strategy.

5. Business partner dialogue

The supplier undertakes to communicate and explain, to the best of its ability, the principles stated in this GP SCoC to its subcontractors and other business partners, who are involved with supplying products and services pertinent to the supplier's contract with PHOENIX group. The supplier shall motivate such parties to adhere to the standards contained herein.

6. Data protection

When processing and using personal data, respect for privacy is a serious concern. PHOENIX group therefore places great importance on the protection of such data, which is a prominent issue in the PHOENIX group Code of Conduct. Where personal data (e.g. names, addresses, or other contact details) is collected, it is processed exclusively in accordance with the applicable local regulations on data protection. The supplier must meet the requirements of the European General Data Protection Regulation, which came into force in May 2018, if he works with PHOENIX group in the European Union or European Economic Area. The supplier must take technical and organizational measures by means of state-of-the-art technology to protect data.

7. Compliance with the Supplier Code of Conduct

PHOENIX group reserves the right to inspect, with reasonable notice, the supplier's compliance with regards to the requirements enshrined in this GP SCoC. PHOENIX group encourages its suppliers to implement their own binding ethical guidelines. In general suppliers are expected to continually improve by setting performance objectives, executing implementation plans and undertaking necessary corrective actions for deficiencies identified by internal or external assessments, inspections or management reviews. Suppliers shall maintain documentation necessary to demonstrate conformance with this Supplier Code of Conduct and compliance with applicable laws.

Confirmation letter of PHOENIX group General Procurement Supplier Code of Conduct

Please sign this document and return it to your PHOENIX contract partner.

Company name: _____

Address: _____

We hereby confirm that we have read and understood the PHOENIX group General Procurement Supplier Code of Conduct available on the PHOENIX group website:

<https://www.phoenixgroup.eu/en/publications/sustainability-reports>

As a currently active supplier of PHOENIX, or as a potential/prospective supplier interested in working with PHOENIX, we expressly confirm that we agree to the stated principles and regulations contained in the PHOENIX group General Procurement Supplier Code of Conduct as follows:

- | | | |
|---|--|-------|
| 1. Ethical Standards | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |
| 2. Health & Safety | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |
| 3 Anti-Corruption and
Competition Compliance | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |
| 4 Environment | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |
| 5 Business Partner Dialog | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |
| 6 Data Protection | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |
| 7 Compliance with the
Supplier Code of Conduct | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |

Name of contact person: _____

Title/Position: _____

E-mail: _____

Date, Place

Stamp and signature