

CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS

Marlenheim, January 5th, 2022

Foreword

Ladies and Gentlemen,

Everad Adhesives SAS has stood for sustainable, long-term business activities for more than 50 years now. We recognize that, as a globally operating company, we have a great responsibility toward our employees, the environment, society, and our shareholders. For this reason, we have committed ourselves to upholding ethical and sustainable practices in everything we do as a company. This applies to our relationship with our suppliers and business partners in particular.

Everad Adhesives SAS considers sustainability within the supply chain to be an important component of our corporate responsibility. We believe that sustainability extends across the entire process of procuring materials, products, and services. To ensure that we are pursuing an integrated approach, sustainability criteria such as environmental protection, occupational safety, and respect for human rights are also taken into account in the selection, assessment, and development of our suppliers.

Against this background, we at Everad Adhesives SAS have developed this Code of Conduct, which establishes nonnegotiable minimum standards and serves as the foundation for our relationships with our suppliers and business partners. By establishing this Code of Conduct, we want to shoulder our responsibility for people and the environment and ensure that our actions and the activities of our suppliers and business partners are ethical, environmentally sustainable, and socially acceptable

Gérard Morin
Chief Executive Officer

The Three Pillars of the Everad Code of Conduct

The Everad Code of Conduct for Suppliers and Business Partners is based on social, environmental, and ethical policies and principles.

Social Policies and Principles

Human Rights

We expect our suppliers and business partners to observe and protect the globally applicable regulations for the protection of human rights as fundamental and universally valid guidelines. Among other things, this means in particular that our suppliers and business partners may not use forced or child labor. At a minimum, our suppliers and business partners must observe Convention 138 (Minimum Age), Convention 182 (Worst Forms of Child Labour), and Convention 105 (Abolition of Forced Labour) of the International Labour Organization (ILO).

Equal Opportunities and Nondiscrimination

We expect our suppliers and business partners to promote equal opportunities and equal treatment and prevent discrimination in the recruitment of personnel, promotions, and the provision of training and further education. No employee may face any disadvantage due to their gender, age, skin color, culture, ethnic origin, sexual orientation, political views, disability, religious affiliation, or ideology. Our suppliers and business partners must observe Convention 111 of the International Labour Organization (ILO) pertaining to Discrimination (Employment and Occupation).

Freedom of Association

We expect our suppliers and business partners to respect the right of their employees to freedom of association and collective bargaining. Employee representatives must not be subjected to discrimination or termination of contract in retaliation for exercising employee rights, submitting grievances, participating in union activities, or reporting suspected legal violations. Our suppliers and business partners must observe Convention 87 (Freedom of Association) and Convention 98 (Right to Organize and Collective Bargaining) of the International Labour Organization (ILO).

Health and Safety in the Workplace

We expect our suppliers and business partners to comply with the respective applicable legal requirements regarding health and safety in the workplace in order to protect the safety and health of their employees. Suppliers and business partners should follow internationally recognized standards, actively work to identify and resolve safety deficiencies, and continually improve conditions in the workplace so that health and safety are guaranteed and protected.

Minimum Wage and Working Hours

We expect our suppliers and business partners to pursue a fair remuneration policy that takes into account all local laws governing labor and pay. If legal or collective bargaining regulations do not exist, wages and benefits shall be based on industry-specific, contractually negotiated remuneration and benefits that are typical for the respective location and ensure an appropriate standard of living for the employees and their families. Our suppliers and business partners must comply with Convention 100 (Equal Remuneration) of the International Labour Organization (ILO).

Environmental Policies and Principles

Environmental Protection

We expect our suppliers and business partners to adopt measures to ensure that the environment is treated in a responsible manner. They should strive to develop and disseminate environmentally friendly technologies. We require that the respective applicable national laws, regulations, and standards pertaining to the environment are upheld. In the development and manufacturing of products, in their utilization phase, and in other activities, provision must be made for the minimization of greenhouse gas emissions, the use of renewable resources, and the minimization of harm to health and the environment.

Energy and Resource Efficiency

We expect our suppliers and business partners to use natural resources sparingly and to reduce environmental impacts in the air, on land, and in the water. Our suppliers and business partners shall contribute to reducing energy consumption and greenhouse gas emissions.

Waste and Recycling

We expect our suppliers and business partners to consider the prevention of waste as well as the reuse, recycling, and safe, environmentally friendly disposal of remaining waste in the development and manufacturing of products, in their utilization phase, and in other activities.

Conflict Materials

We expect our suppliers and business partners to adopt appropriate measures to ensure that their products use no raw materials that are cultivated or mined in conflict or high-risk zones or that finance armed groups that violate human rights.

Chemicals

We expect our suppliers and business partners to register chemical substances in a central database maintained by the REACH (Registration, Evaluation, Authorisation and Chemicals) authority if they produce or import these substances in or into the EU in quantities greater than one metric ton per year.

Product Safety

We expect our suppliers and business partners to observe all respective applicable legal requirements and provisions pertaining to product safety, in particular the legal requirements regarding the safety, labeling, and packaging of products as well as the use of hazardous substances and materials. Our suppliers and business partners shall share their knowledge and expertise with customers, their own suppliers, and third parties and take a transparent and proactive approach to providing Everad with information regarding the environmental and safety aspects of their products.

Ethical Policies and Principles

Legal Requirements

We expect our suppliers and business partners to conduct themselves in an ethical and fair manner when operating their businesses, to observe all international, national, and local laws and regulations applicable to their business activities, and to obtain all necessary permits.

Corruption

We expect our suppliers and business partners to respect, support, and observe national and international efforts (such as the conventions of the United Nations (UN), the Organisation for Economic Co-operation and Development (OECD), and the UK Bribery Act 2010). In particular, they shall ensure that their employees, sub-contractors, and representatives do not pay, offer, or accept any bribes, kickbacks, improper donations, or other improper payments or advantages to or from customers, public officials, or other third parties.

Bribery

We expect our suppliers and business partners not to misuse invitations or gifts to influence others. The same applies to Everad employees. Invitations and gifts are only to be given when the occasion and scale are appropriate; i.e., they are of insignificant monetary value and are considered a business practice that is generally acceptable in the respective location. Likewise, suppliers and business partners shall not request or accept inappropriate advantages of this kind.

Money Laundering

We expect our suppliers and business partners to observe the relevant legal obligations regarding the prevention of money laundering and not to participate in money laundering activities. Our suppliers and business partners shall only conduct business relationships with business partners of whose integrity they are convinced.

Import and Export Controls

We expect our suppliers and business partners to comply with all the respective applicable laws pertaining to the import and export of goods, services, and information. Our suppliers and business partners shall respect any applicable trade restrictions, embargoes, and other restrictions.

Competition

We expect our suppliers and business partners to conduct themselves fairly in the competitive environment and to observe the applicable antitrust laws. Our suppliers and business partners shall not enter into agreements with competitors in violation of antitrust laws, nor shall they take improper advantage of any potential market-dominating position.

Conflicts of Interest

We expect our suppliers and business partners to make their decisions solely on the basis of objective criteria and not to allow themselves to be influenced by personal interests or relationships.

Data, Commercial Secrets, and Company Assets

We expect our suppliers and business partners to observe all respective applicable laws intended to protect the personal data of employees, customers, suppliers, and other affected parties. Furthermore, expertise, patents, company and commercial secrets belonging to Everad or third parties must be respected. Suppliers and business partners shall not pass such information on to third parties without Everad's express written consent. We expect our suppliers and business partners to publish their business data and reports regarding their business activities truthfully and in accordance with the respective applicable laws

Scope of Application

We, Everad Adhesives SAS, expect our suppliers and business partners as well as their employees to act responsibly, observe this Code of Conduct, and perform their work in accordance with the guidelines and principles contained herein. If the suppliers or business partners hire third parties (such as subcontractors or representatives) within the scope of their business relationships, Everad expects these third parties to also perform their work in accordance with the fundamental principles specified in this Code of Conduct. Everad reserves the right to carry out on-site inspections to ensure that the defined requirements are being observed by the supplier or business partner on a case-by-case basis. Such inspections will be carried out by Everad itself or by external partners, following prior notification and in the presence of representatives of the supplier or business partner.

Consequences of Violations

In the event of violations of this Code of Conduct, the supplier or business partner is obliged to report these to Everad. If a supplier or business partner does not observe the fundamental principles defined in this Code of Conduct, Everad is entitled to terminate the business relationship with the respective supplier or business partner for exceptional reasons.