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Orbia Supplier Code of Conduct





Orbia is committed to conducting business to the highest of ethical standards, complying with applicable laws and following international best practices. These principles are outlined in Orbia's Code of Ethics, which is applicable to all Orbia business groups and their suppliers.

At Orbia, we see our suppliers as key partners in our success, which includes ensuring our supply chain adheres to the same high ethical standards we have set for ourselves.

As a condition of doing business with Orbia and its business groups and subsidiaries, we expect our suppliers to operate in accordance with this Supplier Code of Conduct (the "Code") and ensure that their supply chains do so as well. This Supplier Code of Conduct is applicable to Orbia suppliers, their affiliates and subsidiaries, as well as subcontractors and sub-tier suppliers (collectively referred to as "Supplier") that provide goods or services to Orbia or for incorporation into Orbia products.

We will assess adherence to these requirements and will consider a Supplier's progress in meeting these requirements and their ongoing performance when making sourcing decisions. Suppliers are expected to correct non-compliance issues identified during assessments. If a Supplier is unable to or refuses to correct the non-compliance to our satisfaction, we reserve the right to suspend or terminate the relationship at our discretion.



At Orbia, our requirements for Suppliers are:

1. Labor & Human Rights	4	4. Product Safety, Quality & Environmental Stewardship	10
Forced Labor	4		
Child labor	4		
Fair treatment, Non-discrimination, Diversity & Inclusion	4		
Wages and Benefits	5		
Fair Working Hours	5		
Freedom of Association and Collective Bargaining	5		
Speak-up Mechanism	5		
<hr/>			
2. Health & Safety	6	5. Ethics & Compliance	11
Healthy and Safe Working Conditions	6	Anti-Corruption	11
Personal Protective Equipment (PPE) Provision	6	Gifts and Hospitality	11
Precaution for Emergency Situations	7	Fair Business Practices	11
		Protecting Confidential Information & Intellectual Property	11
		Data Privacy & Security	12
		Trade Sanctions & Export Controls	12
<hr/>			
3. Environment	8	6. Management Systems	13
Environmental Sustainability	8	Management System	13
Climate Change	9	Monitoring and Compliance	13
Water Use	9	Audits & Assessments	14
Pollution	9	Duty to Report	14
		Supplier Agreement	14



Labor & Human Rights

Suppliers will uphold the human rights of their workforce and treat employees, contractors, and temporary workers with respect and dignity as understood by the international community. Suppliers are expected to conduct human rights due diligence and address any gaps or opportunities for improvement identified. Suppliers are encouraged to develop lawful workplace apprenticeship programs for the educational benefit of their community.

Forced Labor

Suppliers shall not use forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise.

Child Labor

Suppliers will ensure that their hiring practices are in compliance with International Labor Organization (ILO) Conventions for minimum age (Convention 138) and child labor (Convention 182). Workers under the age of 18 should not perform hazardous work and should be restricted from night work if it interferes with educational needs.

Fair Treatment, Non-Discrimination, Diversity and Inclusion

Suppliers shall not subject any person to employment discrimination (including hiring, salary, benefits, advancement, discipline, termination, or retirement) on the basis of gender, race, religion, age, disability, marital status, sexual orientation, gender identity, nationality, national or ethnic origin, political beliefs, union membership, covered veteran status, or any other status protected by applicable national or local law. Suppliers may not subject employees or potential employees, or members of their workforce to





unlawful medical tests or physical examinations. Reasonable accommodation should be given to the religious practices of workers. Suppliers shall treat each member of its workforce with respect and dignity and shall not allow anyone to be subjected to physical, sexual, psychological, or verbal harassment or abuse.

Suppliers must demonstrate a commitment to identifying, measuring, and improving a culture of diversity and inclusion through all aspects of workplace management.

Wages and Benefits

Suppliers will meet all applicable wage and benefit legal requirements. At all times, wages and benefits must be a living wage according to local living conditions. For each pay period, the Supplier will provide workers with an understandable wage statement that includes sufficient information to verify accurate compensation for work performed, as well as appropriate tax or other statutory withholdings as governed by applicable law.

Fair Working Hours

While it is understood that overtime is often required, Suppliers will manage operations in compliance with local wage and hour legal requirements, including overtime laws. They will ensure that overtime is voluntary, does not exceed levels that create inhumane working conditions, and that all compensation meets applicable overtime pay and benefit requirements.

Freedom of Association and Collective Bargaining

Suppliers will recognize the right of workers to join or to refrain from joining associations of their own choosing and the right to collective bargaining, as required by applicable law. In all cases, worker rights to open communication, direct engagement, and humane and equitable treatment must be respected.

Speak-up Mechanism

Suppliers shall ensure that their global workforce has a mechanism to raise concerns or report behaviors that are inconsistent with the law or the provisions in this Supplier Code of Conduct. It will encourage and enable its workforce to report concerns or illegal activities. The Supplier shall follow up on concerns and take corrective actions if needed. The Supplier guarantees that individuals filing complaints will not be subject to retaliation of any kind. If an internal mechanism for the Supplier's employees and contractors to report concerns does not exist, the Supplier shall publish and make available Orbia's Ethics Helpline to those working on Orbia's account.



2 Health & Safety

Healthy and Safe Working Conditions

Suppliers shall comply with applicable environmental and occupational health and safety laws and regulations and prevent worker (employee and contractor) accidents and injury by providing a safe and healthy work environment. Suppliers shall obtain, keep current, and comply with all required health and safety permits. Suppliers should adopt a management system such as ISO 45001 or Center for Chemical Process Safety “Risk Based Management System”.

Suppliers shall ensure a safe and healthy work environment by identifying the risks of accident or occupational diseases, and taking the necessary measures to mitigate these risks.

Suppliers shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in all facilities.

In addition, Suppliers are expected to protect their global workforce by providing adequate working conditions, including access to adequate lighting, temperature, ventilation, potable drinking water, sanitary facilities, and other safe workplace practices. If the Supplier provides canteens or living quarters for members of its staff, these must meet international standards for hygiene, health, and safety.

Personal Protective Equipment (PPE) Provision

We prioritize the safety and well-being of all workers involved in our supply chain. Therefore, Suppliers are required to provide appropriate





Personal Protective Equipment (PPE) to their workers. Suppliers must ensure that their workforce has access to and consistently wears the necessary PPE in accordance with applicable laws, regulations, and industry standards.

The provided PPE should be suitable for the specific tasks performed by the Supplier's workforce and must include, but is not limited to:

- Head Protection: Helmets, hard hats, etc.
- Eye Protection: Safety glasses, goggles, face shields, etc.
- Hearing Protection: Earplugs, earmuffs, etc.
- Hand Protection: Gloves, finger guards, etc.
- Foot Protection: Safety shoes, boots, etc.
- Respiratory Protection: Masks, respirators, etc.

Suppliers are responsible for ensuring the proper fit, maintenance, and replacement of PPE as needed. Regular training and awareness programs on the correct use of PPE are encouraged.

Precautions for Emergency Situations

Suppliers must prepare for potential emergencies, including implementing emergency plans. These emergency procedures – which shall include procedures for reporting emergencies, notifying and evacuating workers, emergency drills, fire detection and extinguishing equipment, adequate emergency exit facilities and recovery plans—must be shared with workers to ensure their safety in the event of an emergency.





3 Environment

Environmental Sustainability

At all times, Suppliers must meet all applicable environmental laws, operating with all required licenses and permits. We also expect Suppliers to identify, mitigate, and prevent any adverse impacts their business activities may have on the environment, including mitigating air, water, and soil pollution, among other environmental harms. For example, chemicals and other substances that pose a hazard to the environment must be identified and managed by Suppliers to ensure safe handling, use, storage and disposal. Suppliers must adhere to our requirements relating to limiting the use of specific substances, including proper labeling for recycling or disposal.

We expect Suppliers to make efforts to reduce or eliminate all types of waste. When waste cannot be eliminated, Suppliers must manage and control all waste streams in an environmentally responsible and safe manner to comply with applicable laws and regulations. This includes, but is not limited to, prevention of illegal discharges and leaks into stormwater drains and, when necessary, treatment prior to discharge or disposal of all waste-water and solid waste from business activities, industrial processes, and toilet and washing facilities.

Suppliers are expected to have an Environmental Management System (EMS) in place, for example ISO 14001 or the equivalent, with third-party verification strongly recommended.





Climate Change

Suppliers shall commit to reducing its carbon footprint across their value chain, focusing on improving energy efficiency, transitioning to cleaner energy sources, and implementing mitigation and adaptation measures to be resilient against climate-related events.

Water Use

Suppliers will ensure that their management of water resources includes water efficiency, recycling, and treatment strategies. Additional efforts to contribute to managing water-related risks are highly encouraged, especially if suppliers operate within areas of water scarcity.

Pollution

Suppliers will manage their effluents (air emissions, waste, water, etc.) in compliance with the law, prioritizing ecological treatment, safe storage, and circularity principles to keep materials in use and reduce resource use.





4 Product Safety, Quality & Environmental Stewardship

Suppliers shall implement management systems and processes to ensure that product quality and safety requirements are met. Suppliers will provide Orbia with high-quality, fit for use products that meet applicable quality and safety requirements, and will immediately report any product quality or safety issue to Orbia.

We encourage and work with Suppliers to create products that are energy efficient, highly recyclable, and contain recycled materials and eliminate hazardous materials to the extent possible. Suppliers are expected to perform decarbonization efforts across their value chain, focusing on improving energy efficiency, transitioning to cleaner energy sources, and implementing mitigation and adaptation measures to be resilient against climate-related events.

To enable us to evaluate supplier components and products for environmental performance, Suppliers must provide material disclosures as outlined in our controlled and reportable materials disclosure process where applicable.

Suppliers will provide Orbia with high-quality products that meet applicable standards and will immediately report to Orbia any product issues.





Ethics & Compliance

Suppliers are expected to operate at the highest of ethical standards, in compliance with applicable international laws and the principles articulated in Orbia's Code of Ethics. This includes accurate record-keeping and disclosures regarding their business activities, labor, health and safety, and environmental practices as required by law.

Anti-Corruption

Suppliers will conduct their businesses without engaging in corrupt practices, including public or private bribery or kickbacks. Suppliers will maintain integrity, transparency, and accuracy in corporate record-keeping.

Gifts and Hospitality

Orbia discourages Suppliers from providing any gift or offer of hospitality to any of our employees. We have a policy concerning Supplier relationships that applies to all our employees. This policy prohibits employees from receiving cash or gift cards from a Supplier and places strict limits on the receipt of promotional items, personal gifts, and entertainment.

Fair Business Practices

Suppliers will act with integrity and lawfully in the proper handling of competitive data, proprietary information and comply with legal requirements regarding fair competition, antitrust, and accurate and truthful marketing.

Protecting Confidential Information and Intellectual Property

Suppliers will implement processes and procedures to protect all Orbia confidential information, propriety intellectual property, trade secrets, or any other confidential information shared with the Supplier.



Data Privacy and Security

Suppliers must comply with data privacy and cybersecurity laws that apply to Orbia or the Supplier. This includes having systems and procedures designed to protect the privacy of personal information of suppliers, customers, consumers, and workers.

Trade Sanctions and Export Controls

Suppliers will ensure compliance with applicable export controls and trade sanction laws, including but not limited to US, EU, and UK laws, in connection with any products, services, or technology supplied to Orbia. In the event special licenses are required, the Supplier will notify Orbia of such requirement.



6 Management Systems

Management System

Suppliers shall adopt or should have a management system designed to ensure:

- a) Compliance with applicable laws, regulations, and customer requirements related to the Supplier's operations and products;
- b) Conformance with this Code;
- c) Identification and mitigation of operational risks related to the areas covered by this Code, which should drive continual improvement; and
- d) Mechanisms to timely remediate any nonconformance identified by internal or external assessments, inspections, investigations, reviews, and reports.

Monitoring and Compliance

To ensure compliance with our Supplier Code of Conduct, Orbia has the right to monitor Suppliers through scheduled and unscheduled audits and other assessment mechanisms. We seek relationships with Suppliers that are committed to manufacturing our products under fair and safe labor conditions and sound environmental practices. If we determine that a particular Supplier does not comply with our Code, we typically will strive to work with the Supplier to develop and implement an appropriate corrective action plan within a reasonable timeframe. Nevertheless,





depending upon the nature of the non-compliance, we may elect to temporarily suspend or end our relationship with a Supplier at our discretion and at any time, without penalty, upon reasonable or legally applicable notice for failing to adherence to this Supplier Code of Conduct.

Audits and Assessments

Suppliers shall perform periodic evaluations of their own facilities and operations, and the facilities and operations of their subcontractors and sub-tier suppliers that provide goods or services to Orbia to ensure compliance with this Supplier Code of Conduct and the law. Orbia shall have the right to access these evaluations upon Orbia's request. Suppliers shall not have manufacturing operations in, recruit labor directly or indirectly from, or source materials, products, or services directly or indirectly from, regions where Orbia and other third parties cannot access and conduct a comprehensive, independent evaluation of the Supplier's compliance with this Code.

Duty to Report

Finally, we expect Suppliers to report any concerns or violations of this Code of Conduct, including situations that may be caused by an Orbia employee, to your Orbia counterpart or Orbia's Ethics Helpline. This Helpline is available 24 hours a day, seven days a week, and is available in all the languages in which Orbia does business. Please refer to: www.ethics.orbia.com.

Supplier Agreement

Orbia is committed to full compliance with all laws and regulations applicable to the conduct of its business and expects the utmost cooperation and dedication to such efforts from its Suppliers. It is therefore requested that the owner, president, managing director or chairperson (or other authorized representative) of the Supplier's company acknowledge this Code of Conduct, confirming the understanding of its contents and agreement to undertake the obligations set forth herein.



In closing, we highly value the relationship with your company. And thank you in advance for your cooperation. We look forward to continually strengthening our relationship for years to come.

Signed by: _____ Date: _____

Print name: _____

Orbia Supplier Code of Conduct

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