

DELFORT GROUP CODE OF CONDUCT FOR SUPPLIERS



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This Code of Conduct defines the basic requirements placed on the suppliers of Delfort Group concerning their responsibilities towards their stakeholders and the environment. The supplier declares herewith to:

Legal Compliance

- Comply with the laws and regulations of the applicable legal systems.

Human Rights and Labor Practices

- To respect all internationally proclaimed human rights by avoiding causation of and complicity in any human rights violations, heightened attention shall be paid to ensuring respect of human rights of specifically vulnerable rights holders or groups of rights holders such as women, children or migrant workers, or of (indigenous) communities.

Prohibition of Forced and Child Labor

- Neither use nor contribute to slavery, servitude, forced or compulsory labor and human trafficking.

Employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, employ no workers under the age of 14.

- Employ no workers under the age of 18 for hazardous work according to ILO Convention 182.

Non-Discrimination and Respect for Employees

- Promote equal opportunities and treatment of employees, irrespective of skin color, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual identity and orientation, marital status, religious conviction, or age.
- Refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

Working Hours, Wages & Benefits for Employees

- Recognize the legal rights of workers to form or join existing trade unions and to engage in collective bargaining; neither disadvantage nor prefer members of employee organizations or trade unions.
- Adhere to all applicable working-hours regulations globally.
- Pay fair wages for labor and adhere to all applicable wage and compensation laws globally.
- In the event of cross-border personnel deployment adhere to all applicable legal requirements, especially with regard to minimum wages.

Health & Safety of Employees

- Act in accordance with the applicable statutory and international standards regarding occupational health and safety and provide safe working conditions.
- Provide training to ensure employees are educated in health & safety issues.
- Establish a reasonable occupational health & safety management system.

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Environmental Protection

- Act in accordance with the applicable statutory and international standards regarding the environment. Minimize environmental pollution and make continuous improvements in environmental protection.
- Ensure the safe and compliant handling, storage, transportation, disposal, recycling, reuse and management of waste, air emissions and wastewater discharges. Any activity that has the potential to adversely impact human or environmental health shall be appropriately managed, measured and controlled. The release of hazardous substances shall be minimized. Special attention shall be given to active ingredients. Suppliers shall prevent or mitigate accidental spills and fugitive emissions of hazardous materials.
- Establish a reasonable environmental management system.

Quality Requirements

- Implement generally recognized quality standards or contractually agreed quality requirements and standards, in order to provide goods and services that consistently meet Delfort's and its customers' needs, perform as warranted and are safe for their intended use.
- Immediately address all critical issues that have the potential to negatively affect the quality of goods and services. Supplier must inform Delfort about changes of the manufacturing or supply process that have the potential to impact the specification of goods and services provided.

Anti-Corruption and Bribery

- Tolerate no form of and do not engage directly or indirectly in any form of corruption or bribery and do not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage.
- This includes to renounce from giving or accepting improper facilitation payments.

Fair Competition and Anti-Trust Laws

- Act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

Privacy and Intellectual Property

- Safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.
- Respect the intellectual property rights of others.

Conflicts of Interest

- Avoid and/or disclose internally and to Delfort all conflicts of interest that may influence business relationships, and to avoid already the appearance thereof.

Anti-Money Laundering, Terrorism Financing

- Not directly or indirectly facilitate money laundering or terrorism financing.

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Data Privacy and Data Protection

- To maintain appropriate information systems that contain Delfort's confidential information or data and to protect such confidential information and data against unauthorized access, use, disclosure, modification or destruction.
- Collect personal information only for legitimate business purposes, use it in a legal, transparent and secure manner, share it only with those who are allowed access, protect it in accordance with security policies, retain it only for as long as necessary, and obligate third parties with access to personal information to protect it.

Export Control and Customs

- Comply with the applicable export control and customs regulations.

Responsible Minerals Sourcing

- Take reasonable efforts to avoid in its products the use of raw materials which originate from conflict-affected and high-risk areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

Governance & Management Systems

- Provide access to a protected mechanism for its employees to report possible violations of the principles of this Code of Conduct.
- Develop, implement, use and maintain management systems and controls related to the content of this Supplier Code of Conduct. Suppliers shall maintain documentation necessary to demonstrate conformance with the principles outlined in this Code of Conduct.
- Implement mechanisms to regularly identify, evaluate and manage risks in all areas addressed by this Supplier Code of Conduct and with respect to all applicable legal requirements.
- Supplier shall grant Delfort the right upon reasonable prior notice to conduct audits to determine supplier's conformance with the principles outlined in this Delfort Supplier Code of Conduct. The evaluation shall be executed directly by Delfort or by a qualified third party in the form of e.g. an assessment or an audit.

Supply Chain

- Supplier shall replicate the principles set forth in this Delfort Supplier Code of Conduct further down the supply chain.

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Supplier's Acknowledgement

We, the undersigned hereby confirm that:

- we have received and taken due note of the contents of this Delfort's Supplier Code of Conduct and shall comply with the principles of this Delfort's Supplier Code of Conduct, and
- we shall replicate the principles set forth in this Delfort Supplier Code of Conduct further down the supply chain.

Company Name

Glossary

“Conflict Minerals”

Conflict minerals, as currently defined, include the metals tantalum, tin, tungsten and gold, which are the derivatives of the minerals cassiterite, columbinetantalite and wolframite. [URL: www.responsiblemineralsinitiative.org]

“Hazardous Materials”

As defined by the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), as prepared by the UN Economic Commission for Europe (UNECE)

“International Labour Organization (ILO)”

The UN agency ILO brings together governments, employers and workers of 187 UN member states to set labor standards, develop policies and devise programs promoting decent work for all employees. [URL: www.ilo.org]

“Personal Information”

Personal information is any information about an identified or identifiable natural person.