



DELTRIN®

# SUPPLIER CODE OF CONDUCT

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# INTRODUCTION

At Delrin®, we view our suppliers as partners in our success as a company. A successful approach to sustainability requires us to embed our commitment to sustainability into our supply chain. An essential tool to help us do that is this Supplier Code of Conduct, which applies to our suppliers all around the globe.

This Supplier Code of Conduct document is intended to outline key areas and to demonstrate our expectations.



# SAFETY

We have a commitment to zero injuries in the workplace.

We're committed to protecting the safety and health of our employees, our contractors, our customers and the people in the communities where we operate. Similarly, we expect our suppliers to provide a safe and healthy workplace for their employees in compliance with all regulations and applicable laws and to integrate quality into their business processes.

## Suppliers should include these aspects in their safety and health program.

- **Health, Safety, Environmental and Quality Regulations:** Suppliers must comply with all applicable health, safety, environmental and quality regulations. All required permits, licenses and registrations must be obtained, followed and kept current.
- **Occupational Health and Safety:** Suppliers are expected to protect their employees from hazards, including chemical, biological, electrical and physical. At a minimum, adequate lighting, temperature, sanitation, ventilation and potable drinking water are included in a safe and healthy workplace. Where provided, living quarters must meet internationally recognized standards for hygiene, health and safety.
- **Process Safety:** Appropriate communication and training on hazards, procedures and use of proper protective equipment is essential for the safety and health of all employees. In accordance with applicable standards, suppliers must have effective safety programs in place for managing and maintaining all processes..
- **Quality and Product Safety:** Suppliers will consistently provide Delrin with high-quality products and services that meet all applicable quality and safety standards for their intended use. Material safety data sheets must be made available for all hazardous substances.





# PEOPLE

## Treating everyone with dignity and respect.

We strive to empower all people. This extends to how we treat our employees and all our partners—with professionalism, dignity and respect, fostering an environment where people can contribute, innovate and excel. We expect the suppliers and contractors with whom we do business to uphold the same standards.



- **Human Rights:** Delrin® commits to the protection and advancement of human rights wherever we operate. As part of our policy, we will not tolerate the use of child or forced labor, slavery or human trafficking in any of our global operations and facilities, including those operated by our suppliers. Should we learn of violations to these principles that are not corrected, we shall discontinue the business relationship.
- **Prevention of Child and Forced Labor/Fair Treatment:** We will not tolerate the exploitation of children, their engagement in unacceptably hazardous work or the trafficking, physical punishment, harassment, abuse or involuntary servitude of any worker. Suppliers shall not inflict or threaten to inflict corporal punishment or any other forms of physical, sexual, psychological or verbal abuse or harassment on any employees.

Practices such as payment of fees for employment; withholding of passports, wages or personal property; forced overtime, etc. are not acceptable.

- **Diversity, Equity and Inclusion:** We are committed to the elimination of inequality, racism and all forms of discrimination. Addressing equity and equality requires a sustained effort, and engaging in greater inclusivity within our company is not enough. We carefully consider how our business efforts can make a positive and lasting impact in our industries and our communities.
  - We expect our suppliers to reject any form of discrimination, such as those related to race, religious beliefs, gender identity or sexual orientation, and to be equally committed to providing equal opportunities and treatment to all employees.
- **Freedom of Association and Working Hours, Wages and Benefits:** Suppliers are expected to allow freedom of association of their employees and to recognize the right to collective bargaining as a means to resolve issues. Compensation will follow all applicable laws; employees are expected to be paid a fair wage for work performed, have reasonable work hours and receive proper remuneration for all overtime hours worked. Suppliers will comply with all applicable employment non-discrimination laws.

# ETHICS

## We are a respected, global corporate citizen.

We conduct ourselves in accordance with the highest ethical standards and in compliance with all applicable laws, always striving to be a respected corporate citizen worldwide. And we expect the same from our suppliers.

- **Business Integrity and Fair Competition:** Suppliers must act with the highest integrity and transparency in accordance with all relevant anti-bribery and anti-corruption laws and regulations, including the Foreign Corrupt Practices Act, UK Bribery Act and any other applicable local laws. Suppliers must never engage in any form of bribery to secure business on behalf of Delrin® or any other company. Suppliers must conduct business in adherence to fair competition principles and comply with all applicable antitrust laws.
- **Intellectual Property and Confidential Information:** Protection of our intellectual property (IP) is critical to the future of our company. Suppliers will implement measures to protect all IP provided during the course of our business transactions. Information should be treated as confidential and only be provided to supplier's employees on a "Need to Know" basis. Documents containing confidential information no longer needed by the supplier to conduct business on behalf of Delrin should either be returned to Delrin or destroyed, as appropriate
- **Supplier Anti-Counterfeiting Requirements:** The supply of counterfeit products or materials (including those that have been illegally replicated, reproduced or manufactured) is strictly prohibited. Delrin suppliers are expected to ensure that counterfeit products or materials are not supplied or introduced into Delrin's supply chain. Suppliers shall purchase materials or products to be delivered or incorporated as goods to Delrin only directly from the original manufacturer, an authorized distributor of the original equipment or component manufacturer, an authorized aftermarket manufacturer, an authorized reseller or other authorized trading or logistics agents. At a minimum, every supplier should have anti-counterfeit programs that address the following matters: 1) governing the detection, prevention, removal or mitigation of counterfeit, fraudulent or suspect products and materials from the supply chain; 2) ensuring counterfeit products or materials are appropriately reported to applicable governmental authorities and impacted stakeholders; 3) continually improve purchasing processes aimed at reducing the risk of procuring counterfeit parts.



- **Gift Policy:** We do not encourage giving or receiving gifts. In rare cases when gifts or entertainment are provided, they need to be consistent with customary regional business practices, have a clear business purpose, cannot be perceived as a bribe or improper payment, are not offered to influence a business relationship improperly, do not violate applicable laws or ethical standards and would not embarrass the supplier or Delrin if publicly disclosed. Additionally, we have a strict gift policy for employees in the global procurement function at Delrin. Within our organization, employees may not accept any gifts. We ask our suppliers to help us meet our commitment to the highest ethical behavior by not sending any gifts, even during traditional “gift-giving times”, such as the holidays at the end of the year.

- **Data Protection and Cybersecurity:** Suppliers are expected to implement and maintain appropriate data protection and cybersecurity controls to safeguard all information received from or processed on behalf of Delrin. This includes, but is not limited to, personal data, confidential business information, and any data related to Delrin’s customers, employees, or operations. Suppliers must comply with applicable data privacy laws and regulations and promptly notify Delrin of any actual or suspected data breach or security incident. Suppliers must also ensure that any third parties with access to Delrin data are contractually bound to equivalent data protection obligations.

If you suspect any actions that are inconsistent with our business ethics policies, you can report your concern anonymously via phone or online.

# SUSTAINABILITY

## Our journey to carbon neutrality.

We create sustainable solutions for our customers, managing our businesses to protect the environment and preserve the earth's natural resources.



- **Climate Protection:** We expect our suppliers to use natural resources such as energy, water and raw materials in an economical way. When possible, suppliers should consider the use of renewable resources in their supply chains and enact procedures to establish and track progress toward sustainability goals. We encourage our suppliers to a) reduce greenhouse gas emissions; b) responsibly manage water use—quantity and quality; c) improve energy and resource efficiency; and d) reduce waste.
- **Safe and Sustainable by Design:** Our practices enable our products to meet or exceed applicable regulatory requirements. Our team reviews our product portfolio for the presence of Substances of Concern, and we are committed to reducing, eliminating or replacing such substances where possible. We acknowledge that realizing our commitment to avoid, reduce or eliminate Substances of Concern requires a strong relationship with our customers and suppliers. It is our expectation that suppliers will firmly commit and actively support our efforts to reduce, eliminate or replace such substances, where possible.



# GOVERNANCE

## Working together.

Ensuring these guiding principles are embedded in our supply chain is important to us. Suppliers are expected to adopt or establish a management system covering these standards. Monitoring of performance and setting of goals or targets is required for any program to be effective. In the spirit of continuous improvement, we are committed to working with and supporting our suppliers to meet the requirements of this Code.

- **Legal and Customer Requirements:** Suppliers must comply with all applicable laws, regulations, contractual agreements and generally recognized standards related to supplier's operations, products and services.
- **Commitment, Accountability and Risk Management:** Suppliers are expected to allocate appropriate resources to ensure the implementation and on-going compliance with this Code, including periodic self-evaluation to ensure conformance. Suppliers must identify and manage risks in all areas addressed.
- **Non-Compliance:** We reserve the right to verify compliance with this Code through internal and external assessment mechanisms. If non-compliance is discovered, the supplier must take corrective action. If the supplier fails to remedy an act of non-compliance in a timely manner, we may suspend purchases, refuse delivery and/or return any goods or services from the supplier, at our discretion and without further obligation.



# AGREEMENTS

**Delrin® Supplier**

by: \_\_\_\_\_

name: \_\_\_\_\_

title: \_\_\_\_\_

date: \_\_\_\_\_

**Delrin® USA, LLC.**

by: \_\_\_\_\_

name: \_\_\_\_\_

title: \_\_\_\_\_

date: \_\_\_\_\_





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