CUMAPOL
POLYESTER UPGRADING

CORPORATE SUSTAINABILITY

Code of Conduct

Ethics and behaviour Cumapol Emmen B.V. requires throughout its supply chain, of every supplier and their subcontractors.

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Cumapol Emmen B.V. · www.cumapol.nl

> CUMAPOL EMMEN B.V.'s Code of Conduct describes the ethics and behavior that CUMAPOL EMMEN B.V. wishes to promote throughout the supply chain; it is directed at any supplier for CUMAPOL EMMEN B.V.. The code of conduct is based on and follows The Universal Declaration of Human Rights, key UN conventions, ILO conventions and recommendations. All legal requirements and regulations in operating countries must be met.

GENERAL CONDITIONS

In agreeing to do business with CUMAPOL EMMEN B.V., all suppliers agree to respect ethical and environmental responsibilities within their business. Suppliers should ensure that they have a nominated contact person within their company who is responsible for communicating this Code of Conduct and all related requirements throughout their supply chain. Suppliers should be open and willing to engage with CUMAPOL EMMEN B.V. on projects and initiatives undertaken. This includes participating in CUMAPOL EMMEN B.V. organized training, effectively disseminating information to subcontractors and workers, displaying any relevant information and specifically produced material in the factories and actively engaging in focus projects or initiatives started by CUMAPOL EMMEN B.V.. All businesses involved at any stage in the production must be open to audits to evaluate and monitor compliance to the code. Suppliers who join us and place sustainability within their business agenda, who are open, honest and willing to work with CUMAPOL EMMEN B.V. in partnership on these issues, are those whom we wish to develop with further into the future.

MANAGEMENT SYSTEMS

Suppliers should develop and maintain appropriate management systems to ensure that they are continuously improving and working in compliance to this code. Suppliers should set up their own internal policies in regards to ethical production and environmental responsibility. Suppliers should have efficient systems in place to ensure that these policies are effectively implemented throughout the organization and effectively monitored. Suppliers should perform their own risk assessment of all facilities to identify areas in need of improvement, and perform periodic self-evaluation checks on own and subcontractors' facilities to ensure they are working within this code.

HUMAN RIGHTS AND LABOR RIGHTS

PREVENTION OF FORCED OR INVOLUNTARY LABOR

Suppliers must not use any illegal workers, or any kind of forced or prison labor. Workers will not be required to leave any form of deposit or identity papers/passport with their employer and may terminate a contract after legal notice. Employees are to have permission to leave the factory under reasonable circumstances and should have free access to toilets, water and religious facilities when at work. A signed working contract must be available for all employees, which is provided by the supplier in a language that is understandable to the employee.

WORKING HOURS AND ADEQUATE REST

Working hours should be kept within legal limits and benchmark industry standard. Working hours should not on a regular basis exceed 48 hours per week. Suppliers must provide sufficient rest days to employees, classified as at least 1 day off in a 7 day period. Overtime shall be voluntary and shall not exceed 12 hours per week. Overtime shall not be demanded on a regular basis and always compensated at a premium rate. Employees are entitled to refuse overtime without incrimination.

THE RIGHT TO COLLECTIVE BARGAINING & FREEDOM OF ASSOCIATION, FREEDOM FROM DISCRIMINATION AND HARASSMENT

The supplier will recognize ILO conventions and the Universal Declaration of Human Rights on freedom of association, freedom of opinion and expression, the right to organize and collective bargaining. Employees shall not be subjected to discrimination (including during recruitment, promotion, access to training, termination or retirement) regarding race, color, caste, nationality, religion, gender, age, sexual orientation or marital status. Suppliers will allow these rights, will not interfere with workers' unions and will not prevent workers from joining these unions. Workers shall not face prejudice due to union membership or active participation in workers' committees. Worker representatives shall have access to carry out their function in the workplace. Where freedom

of association and the right to collective bargaining is restricted or prohibited under law, the employer shall facilitate and not hinder alternative forms of independent and free worker representation and negotiation, in accordance with international labor standards.

ADEQUATE COMPENSATION

The supplier shall always comply with current laws concerning compensation for work, including overtime payments and payment procedures. Wages will not be withheld for any reason. Deductions from wages as a disciplinary measure, or any other deduction not required by law, must not occur. The employees are entitled to at least the statutory minimum wage, or the standard benchmark rate in the industry, whichever is higher, and should be enough to meet basic needs and provide some discretionary income.

PREVENTION OF CHILD LABOR & PROTECTION OF YOUNG WORKERS

No children below the age of 15 can be employed in factories producing for CUMAPOL EMMEN B.V.. If the law states a higher age, the law must be followed. The supplier must have sufficient management systems in place to ensure no children are employed. Young workers below the age of 18 can only undertake light work in the factory, and all laws concerning the treatment of young workers must be followed.

REGULAR EMPLOYMENT & PROTECTION OF VULNERABLE GROUPS

When suppliers engage employees, temporary workers, subcontractors, or other contracted personnel to perform work for CUMAPOL EMMEN B.V., the supplier remains fully responsible for ensuring compliance with all applicable laws and regulations, this Code of Conduct, and any guidelines or requirements established by CUMAPOL EMMEN B.V.

HEALTH & SAFETY

TRAINING AND COMMUNICATION

All employees shall undergo effective training and information sessions regarding health and safety precautions in the work place. Factory management should actively facilitate the establishment of workers' health and safety committees.

WORKING ENVIRONMENT

The supplier shall provide a safe, clean and healthy working environment with adequate space and services for employees.

PREVENTION OF INJURY

Suppliers must do a thorough risk assessment of all areas of the facility and ensure that employees are not working in a dangerous environment. Where risks cannot be eliminated, the supplier must provide sufficient and well-maintained personal protective equipment and all risks must be clearly marked. There must be a sufficient number of employees trained in first aid and adequately stocked first aid kits should be available to all employees.

FIRE SAFETY AND EMERGENCY PREPAREDNESS

All fire safety precautions must be taken, including adequate warning systems, provision of fire safety equipment, clear and well-marked exits and escape routes and training of employees in fire response. There must be a written and communicated emergency response procedure.

PROTECTION FROM CHEMICAL EXPOSURE

All necessary safety precautions related to the use, storage, handling, and disposal of chemicals shall be implemented. Employees must receive adequate training on the safe handling of chemicals and the associated hazards. An up-to-date Safety Data Sheet (SDS) must be readily available for all hazardous chemicals present on-site.

KITCHENS, DINING AREAS AND DORMITORIES

Dormitory buildings, if applicable, shall be separate from the factory building. Dormitories must have sufficient living and storage space for workers and all necessary services must be provided. Dormitories, kitchens and dining areas must have all necessary health and safety as well as fire safety precautions taken.

ENVIRONMENTAL PROTECTION

All national and regional environmental laws must be followed, and suppliers must set up an environmental management plan in order to minimize the effect of business activities on the environment.

ENERGY EFFICIENCY, AIR EMISSIONS AND CLIMATE CHANGE (GHG EMISSIONS)

Suppliers should work to reduce energy consumption and greenhouse gas footprint. All emissions that are produced during production must be monitored, controlled and treated as required by law.

CHEMICAL RESTRICTIONS

All chemicals and hazardous materials must be safely handled, transported and disposed of according to law with detailed records kept. Moreover a MSDS in the local language must be available where the chemicals are used.

WATER AND WASTE WATER MANAGEMENT

Suppliers should use water responsibly and work to minimize their water footprint. This includes reducing water use and implementing water recycling as much as possible. Suppliers must treat and dispose of wastewater according to the local law or the benchmark guideline in the industry whichever is stricter.

CLEANER PRODUCTION AND WASTE MANAGEMENT

Suppliers shall work to improve resource efficiency e.g. by implementing cleaner production techniques and reduce waste during production processes. Suppliers shall implement methods to reuse or recycle waste from the factory. Suppliers should keep detailed records of resource consumption as well as waste production and emissions, to ensure effective monitoring. This information should be available to CUMAPOL EMMEN B.V. on request.

ETHICS

INTEGRITY

Suppliers should display the highest level of ethical integrity when dealing with workers, suppliers and CUMAPOL EMMEN B.V. employees. Suppliers should work against corruption in all its forms, including extortion and bribery.

ANTI-CORRUPTION

Suppliers must not offer, give, request or accept any bribe, kickback or other improper payment or benefit to gain a business advantage, and must comply with all applicable anti-corruption laws and regulations in the countries where they operate. Gifts, hospitality or gestures of appreciation towards CUMAPOL EMMEN B.V. employees or their business relations must remain modest, transparent and never be offered with the intention of influencing a business decision. Any conflict of interest, whether real or perceived, must be disclosed to CUMAPOL EMMEN B.V. without delay.

DATA PROTECTION, PRIVACY AND INFORMATION SECURITY

Suppliers must handle personal data of employees, workers, customers and business partners in accordance with applicable data protection and privacy laws, including but not limited to the GDPR where relevant. Personal data may only be collected, used and stored for legitimate business purposes, must be kept accurate and up to date, and must not be retained longer than necessary. Suppliers must take appropriate technical and organizational measures to protect personal and business information against unauthorized access, loss, misuse or disclosure, and must promptly inform CUMAPOL EMMEN B.V. of any data breach that may affect CUMAPOL EMMEN B.V. or its employees. Confidential business information shared by CUMAPOL EMMEN B.V. must not be disclosed to third parties without prior written consent.

PROTECTION OF 'WHISTLEBLOWERS'

Suppliers should provide an anonymous method for workers to report workplace grievances and ensure that policies are in place to protect workers when complaints and grievances are reported in good faith.

ANIMAL WELFARE

No CUMAPOL EMMEN B.V. products will cause harm or cruelty to animals during their manufacture, and we do not use real fur in our products. CUMAPOL EMMEN B.V. requires that materials derived from animals used in our products are from animals that are treated according to animal welfare laws and international recommendations.

TRANSPARENCY AND SOURCING OF MATERIALS

Suppliers must declare and register subcontractors with CUMAPOL EMMEN B.V.. All suppliers must be fully aware of all sites and companies involved in their production network and should be able to provide CUMAPOL EMMEN B.V. with a detailed and comprehensive map of their supply chain on request.

CUMAPOL EMMEN B.V. requires that suppliers are sourcing raw materials and fabrics responsibly. Raw material production as well as fabric manufacture must not have a negative impact on human rights. If CUMAPOL EMMEN B.V. decides that certain companies, regions or countries are not to be worked with based on ethical or environmental concerns, suppliers must respect these sourcing decisions.

SUPPLIER COMMITMENT TO CUMAPOL EMMEN B.V.'S CODE OF CONDUCT

This supplier commitment sheet must be signed and returned to CUMAPOL EMMEN B.V.'s office contact person. Please retain the Code of Conduct for your reference.

We hereby confirm that we have received, read and understood CUMAPOL EMMEN B.V.'s Code of Conduct and we understand the importance that this code is observed by us, by our suppliers and subcontractors.

We will be open and willing to allow CUMAPOL EMMEN B.V. access to any production site to check compliance to this code and CUMAPOL EMMEN B.V. is entitled to use the audit information for all relevant purposes within its business.

We accept that CUMAPOL EMMEN B.V. is entitled to modify, make additions to, or otherwise change the Code of Conduct.

We accept that CUMAPOL EMMEN B.V. is entitled to cancel orders and terminate the business relationship with no compensation required if we do not comply with this code, unless in exceptional cases an agreement has been made with CUMAPOL EMMEN B.V. to allow more time to make improvements. We understand that transparency and honesty are core values of this code and required to maintain the business relationship with CUMAPOL EMMEN B.V..

COMPANY NAME

COMPANY ADDRESS

FULL NAME AND POSITION

DATE

SIGNATURE AND STAMP