



# Supplier Code of Conduct

## SUPPLIER CODE OF CONDUCT

Vantage<sup>1</sup> is *Enabling Tomorrow's Solutions Today* as an industry leader in sustainable interfacial (surfactant) chemistry built on a backbone of natural oils and fats. Through a differentiated "Customer First" approach, we provide tailored formulations, ingredients and custom solutions that cater to the evolving needs of consumer and industrial markets.

As a global company, Vantage is committed to the highest standards of integrity and responsibility, and expects all its partners to have, or to make, a similar commitment.

The **Vantage Supplier Code of Conduct** ("Code") details how we expect our partners to work with us to deliver materials, products and services ethically, legally and in a manner that benefits all. We expect our suppliers, contractors, and third parties (collectively "Suppliers") to fully implement the **Code** and ensure compliance with local and national laws and regulations. Rigorous application of the following elements is critical to sustaining a commercial relationship with Vantage.

### 1. Child Labor

Suppliers shall not engage nor support any form of child labor. Employed persons shall meet the applicable country laws where young people are employed.

Children under the age of 18 shall not be employed where their work is likely to be harmful to their health and/or development, or under otherwise hazardous working conditions.

### 2. Forced Labor

Suppliers shall not benefit from any form of forced labor nor permit the use of forced or involuntary labor of any type (including but not limited to forced, trafficked, bonded, indentured or involuntary prison labor). Workers shall be free to leave employment without penalty on the provision of reasonable notice.

- Suppliers shall ensure no fees or related costs are charged to applicants and workers for recruitment; and no monetary deposits, financial or collateral guarantees or personal possessions are demanded as a condition of employment.
- Suppliers shall ensure that workers are not held in debt bondage or forced to work for an employer, or any other entity to pay off debt.
- Suppliers shall not restrict worker's freedom of movement, require workers to remain at the workplace at the conclusion of their working hours or confine them in any worker accommodation.

### 3. Wages and Fringe Benefits

Suppliers guarantee that wages are paid regularly and sufficient to allow employees and their family to meet their basic needs and in compliance with local wage and hour regulations.

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<sup>1</sup> Vantage Specialty Chemicals, Inc., and its affiliates

#### 4. Humane and Dignifying Treatment

Suppliers shall treat their employees with respect and dignity. They must not engage in any kind of physical, verbal, psychological or sexual abuse, harassment or any other forms of intimidation or misconduct or any unlawful discrimination.

#### 5. Worker's Health and Safety Protection

Suppliers shall protect workers, contractors, and visitors from any accidents or occupational diseases.

Suppliers shall have programs to identify, assess and manage processes safely to prevent physical hazard, occupational over-exposure to chemicals, pharmaceutical compounds, and biological agents.

Suppliers working on Vantage properties shall abide by and comply with all site-specific environmental, health and safety requirements.

Suppliers shall operate and maintain their buildings, operations, and equipment in a manner protective of their employees, contractors, communities and the environment.

#### 6. Compliance with Legal and Regulatory Requirements

Vantage seeks to build a relationship based on trust with business partners that understand and share the same values and ethical principles as Vantage. Vantage requires all suppliers to commit to:

**Legal Compliance:** Conducting its business in accordance with the highest ethical business standards and in compliance with applicable laws and regulations in the countries where we do business including maintaining appropriate management and training practices.

**Conflict Minerals:** Not supplying materials or products that contain conflict minerals as outlined in the Organization for Economic Co-Operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals.

**Anti Bribery and Corruption:** Adhering to the highest standards of ethical business conduct. Suppliers shall not engage in bribery or corruption in any form, either directly or through third parties.

**Improper Gifts, Entertainment, and Hospitality:** Not giving gifts or entertainment to Vantage employees or representatives, that create a conflict of interest or the appearance of a conflict.

**Privacy and Confidentiality:** Respecting and safeguarding Vantage's confidential information (including personal information), only using confidential information only for the purposes for which it was provided.

#### 7. Environmental

Suppliers shall ensure that all substances presenting an environmental risk are identified, labelled, stored, handled, transported and disposed of in a manner that prevents and mitigates accidental spills and releases to the environment and that they maintain appropriate management systems for safety and environmental compliance meeting appropriate international standards.

Suppliers shall reduce energy and water consumption, and minimize greenhouse gas emissions, to the extent practicable, to preserve natural resources. Suppliers shall safeguard biodiversity locally in its sites and indirectly, through their purchased raw material policy.

## **8. Products And Services Perform as Warranted and Are Safe For Their Intended Use**

Suppliers shall implement robust monitoring, measurement, and documentation processes to ensure delivery of high-quality product within specification. Effective preventative measures and corrective actions will be implemented to assure product quality and specifications are achieved.

Suppliers shall not knowingly:

- Produce or distribute products, including promotional items, or services that could adversely impact employees' or consumers' health.
- Endanger customers or adversely impact Vantage's brand reputation.
- Take decisions about product safety or product quality without the authority and / or sufficient knowledge to do so.
- Respond to customers or consumers about the product quality or safety of products without authorization.

## **9. Ethical Conduct and Compliance with Laws**

Suppliers are expected to follow the laws, regulations and standards that apply to them and their business and treat legal requirements as a minimum standard.

## **10. Monitoring and Compliance**

Vantage is committed to establishing mutually beneficial relations with our suppliers, customers and business partners.

In our business dealings we expect our partners to adhere to business principles consistent with our own.

Vantage may conduct audits and assessments to monitor compliance with the Vantage Supplier Code of Conduct. Vantage is committed to working with to address issues that negatively impact society and the planet.

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