KLK OLEO
Excellence in Oleochemicals

Code of Business Conduct for Kolb Suppliers

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Kolb is a group of Europe's leading alkoxylators companies with a headquarter based in Switzerland and with production sites in Switzerland and The Netherlands (hereinafter "Kolb").
We at Kolb:

- Create value through innovation and sustainability
- Care about the environment and treat our employees with respect and fairness
- Care about the health of our employees and a strong safety culture
- Develop collaborations that base on integrity/trust and fair competition

1. Purpose

We at Kolb take our responsibility for the owner, employees, suppliers, any other business partner, society and the environment serious. As reflected in the Business Code of Conduct for Kolb Employees, Kolb is committed to high ethical business standards and sustainability. With this Code of Conduct for Kolb's Suppliers (hereinafter: Code), Kolb seeks to strengthen its supply chain partnerships to make its value chain and solutions sustainable beyond its own operations.

2. Area of Applicability

This Code defines the minimum standards Kolb requests from its suppliers (incl. their parent companies, subsidiaries and affiliates), as well as their sub-tier suppliers or any other business partner with whom Kolb does business (hereinafter "Kolb suppliers") to respect, and adhere to when conducting business with Kolb.

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3. Commitment

Sustainability, Compliance and Kolb's high ethical business principles are an integral part of the company's business strategy. Kolb expects as much from itself as from its suppliers that all applicable laws and regulations are adhered to. Internationally recognized and endorsed standards in key areas such as international human rights, business ethics and labour conditions, and the environment are also respected:

- The Ten Principles of the United Nations Global Compact initiative
- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights
- The Core Conventions of the International Labour Organisation (ILO)
- The RSPO Principles & Criteria for Sustainable Palm Oil Production (hereinafter: RSPO)

Kolb expects its suppliers to strive to meet both international and industry best practices. Kolb is committed to the chemical industry's Global Responsible Care Program, and expects from its business partners that the environmental, health and safety knowledge and performance of their technologies, processes and products over their life cycles are continuously improved so as to avoid harm to people and the environment. Kolb also expects that its suppliers request their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Code. Kolb recognises that this is a dynamic rather than static process. Kolb asks its suppliers of palm oil to adopt and adhere to the RSPO standards to support the goal that all palm and kernel oil produced is sustainable.

4. Compliance

All Kolb suppliers must comply with all applicable laws and regulations, the requirements set out in this Code and your contractual obligations to us. Suppliers to Kolb shall keep record of all relevant documentation, and provide Kolb with supporting documentation upon request. Kolb reserves the right to verify compliance with this Code through self-assessments, and internal and external assessment mechanisms. In cases of non-compliance, Kolb will require implementation of improvment toward the audit findings and offer support during remediation. Further contractual obligations remain unaffected by this Code and take precedence over the provisions herein. This applies in particular to contractual provisions under which you are obligated to comply with certain ESG Standards and/or requirements under supply chain legislation (e.g. the German Supply Chain Due Diligence Act - Lieferkettensorgfaltspflichtengesetz). Failure to comply with this Code may result in discontinuance of business relationships.

5. Business Ethics

1. Kolb suppliers shall conduct their business in an ethical and fair manner, operate in full compliance with international, national and local laws and regulations that are applicable to their business operations and the relationship with Kolb, and obtain and maintain all the necessary permits.
2. Kolb suppliers shall adhere to free and fair competition, and abide by relevant anti-trust and competition laws and regulations.
3. Kolb suppliers shall comply with all anti-corruption and anti-bribery laws. Their employees shall not engage in any form of active or passive corruption, extortion, fraud, or bribery neither with public (officials) nor private parties.
4. Kolb suppliers shall report and disclose information on any situation in which there is an actual, or there may appear to be a conflict of interest relating to your activities as a supplier to Kolb.
5. Kolb suppliers shall comply with all applicable laws and regulations governing the protection, use and disclosure of proprietary, confidential, and personal information. In case of sub-contracting, sharing of confidential information should be made with the consent of Kolb
6. Kolb suppliers shall abstain from money laundering activities and maintain proper and accurate records (true and fair view) governing all business transactions related to Kolb.
7. Kolb suppliers shall respect the applicable trade control regulations, embargoes, sanctions and other restrictions and put requisite compliance mechanisms in place.

6. Employment Practices

Kolb wants to do business with legally authorized and qualified persons in accordance with nationally recognised employment laws and regulations only. Kolb suppliers shall respect the internationally proclaimed human and labour rights, and all applicable labour laws and regulations, industry standards and binding collective agreements.

1. Kolb suppliers shall have written policies and practices in place, and maintain proper and accurate records governing all aspects of employment.
2. Working conditions provided by Kolb suppliers shall be not less favourable than the best conditions prevailing locally, for work of the same character performed in the trade or industry concerned in the area where work is carried out.
3. Kolb suppliers shall provide equal employment opportunities, and not apply any form of discrimination in hiring and employment practices on criteria such as gender, age, religion, physical ability, national origin, sexual orientation, union membership, political affiliation, marital status, race, colour, or medical tests.
4. Kolb suppliers shall pay their employees adequate, fair remuneration according to the work delivered; minimum wages as prescribed by law are granted.
5. Kolb suppliers shall adhere to all applicable national laws, regulations and procedures concerning hours of work, public holidays and leave. Kolb suppliers shall not require its employees to work more than the regular and overtime hours allowed by the law.
6. Kolb suppliers shall not tolerate any form of verbal, physical, sexual or psychological abuse, threat or harassment, or intimidation.
7. Kolb suppliers shall respect and support the rights to freedom of association and collective bargaining.
8. Kolb suppliers shall respect the ILO core convention on the elimination of all forms of forced and compulsory labour, incl. involuntary prison labour and human trafficking.
9. Kolb suppliers shall respect the ILO core convention on minimum age and child labour.

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7. Health, Safety and Quality

Kolb supplier's operating and management systems as well as their employees shall continually work on high quality solutions and preventing work-related illnesses and injuries.

1. Kolb suppliers shall adhere to all applicable safety, health and quality standards, laws and regulations. Where regulatory health and safety frameworks prevail to sufficiently protect their employees' safety and health, and that of the local neighbourhoods of the sites or locations they are operating in, they shall adopt the respective best international practice principles.
2. Kolb suppliers shall provide a safe and healthy workplace and working conditions for its employees or any business partner conducting business on their behalf and/or premises.
3. Kolb suppliers shall identify and manage the quality, health and safety risks and impacts attached to their products and services, including in the development, production, distribution, use, and disposal phases.
4. Kolb suppliers' products and services shall be designed in accordance with applicable quality, safety and health industry standards and laws and regulations, incl. material restrictions (e.g. REACH) and Kolb's own quality requirements.
5. Kolb strongly prefers to do business with suppliers whose management systems are ISO 9001, ISO 45001, SA8000 or similar, certified.

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8. Environment

Kolb suppliers' operating and management systems as well as their employees shall continually work to mitigate any significant adverse negative environmental impacts.

1. Kolb suppliers shall adhere to all applicable environmental laws and regulations, and respective industry standards.
2. Kolb suppliers shall use natural resources, including energy and water, efficiently, reduce waste and emissions to air, land and water, and treat any waste appropriately before discharge or disposal.
3. Kolb suppliers shall identify and manage the environmental risks and impacts of its processes, and products and services, and demonstrate continuous environmental performance improvement over their entire life cycles.
4. Kolb suppliers shall apply energy-efficient and environmentally friendly technologies in their production and services.
5. Kolb strongly prefers to do business with suppliers whose management systems are ISO 14001, EMAS, or similar, certified.
6. Kolb suppliers of palm and kernel oil shall adhere to the RSPO standard. In particular:
   - No areas classified as High Carbon Stock (HCS) will be developed for oil production (plantations) to stop deforestation and lower Green House Gas (GHG) Emissions
   - High Conservation Value Areas (CVA) shall be identified, protected and conserved to maintain its biodiversity value
   - A zero-burning policy is adhered to in relation to all new planting, re-planting or other development
   - For existing peat areas suppliers shall apply best management practices and/or find eco-friendly alternatives for use or restoration, whereas no new peat areas regardless of depth shall be developed
   - The land tenure rights shall be respected
   - The rights of indigenous and local communities on lands to which they hold legal, communal or customary rights shall be respected
   - Smallholder farmers shall be integrated into the supply chain and provided with access to education for their children.

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9. Consultation, Grievance Mechanisms and Access to Remedy

Kolb provides company-based grievance mechanisms for effective remedy to its internal and external partners and stakeholders. In the context of our business relationship, if there is any believe that the terms of this Code of Business Conduct for Kolb Suppliers are not adhered to, or that Kolb acts in conflict with it itself, then Kolb encourages you to raise your concerns or report incidents via Kolb's reporting channels without fear of retribution. All reported incidents are processed, investigated and followed-up (where appropriate) within a determined time frame.
Contact details:

Kolb Distribution Ltd.
Maienbrunnenstrasse 1
8908 Hedingen
Switzerland

Phone: +41 44 762 47 20
Email: compliance@kolb.ch

10. Declaration of Consent Code of Business Conduct for Kolb Suppliers

I herewith acknowledge that I have read and understood the Code of Business

Conduct for Kolb Suppliers (General 1007, version 4, November 2023). I am committed to adhere to its rules.

Place, Date .....

Company name .....

Company address .....
.....
.....

Function of Employee signing the Code .....

Name of Employee .....
(In printed letters)

Signature of Employee .....