



Supplier Code of Conduct

Working with our subcontractors, suppliers and partners to do the right thing

Supplier Code of Conduct

The Supplier and Tatry Group Ltd wholeheartedly agree to abide by this Code of Conduct and agree to proactively follow the steps outlined below to promote good social and environmental practices throughout the supply chain.

We have created this as a cornerstone of our commitment to responsibly source our products and services.

This Code defines the universal standards that we require our suppliers to adhere to when conducting business with us. The requirements laid out in the Code are based on internationally recognized standards, including:

- UN Guiding Principles on Business and Human Rights
- UN Global Compact Principles and the
- International Labour Organisation (ILO) Declaration on Fundamental Rights and Principles at Work.
- Ethical Trading Initiative Base Code

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Scope

The term “Supplier” or “Suppliers” means any person or entity that is the source for goods or services. The Code is applicable to all workers and employees of any of those suppliers (including permanent, temporary, contract agency and migrant workers). This includes all workers providing work at a supplier location, such as under an employment agency or service provider.

It also applies to any subcontractors and third-party labour agencies. We expect our direct suppliers to support our commitment to full compliance with this Code via the development and implementation of a similar policy and risk-based due diligence process over their own supply chains.

By agreeing to adhere to this Code, Suppliers agree to adhere to any corresponding Product-Specific Standards, where applicable. If no product-specific standard is applicable, Suppliers shall follow this Code or propose an auditable standard for review.

We reserve the right to regularly ask Suppliers to confirm adherence to this Code.

Business Ethics

Compliance with Law

Tatry Group has a zero-tolerance policy towards suppliers and business partners committing fraud, corruption or other serious violation of the law. Accordingly, our Suppliers must comply with all applicable laws and regulations, including competition, data protection and anti-bribery laws and regulations.

Bribery/Corruption

All forms of bribery, kickbacks, corruption, extortion, embezzlement and unethical practices are prohibited, and Suppliers must have a zero-tolerance policy to prohibit any such behaviour. Suppliers shall not take any action that would violate, or cause us to violate, any applicable anti-bribery law or regulation, including the Bribery Act 2010.

Gifts/hospitality

Any business entertainment or hospitality with our staff, auditors or other third parties must be reasonable in nature and not intended to influence in any way business decisions.

Conflicts of interest

Suppliers will declare any conflict of interest in any business dealings with us and will actively seek to avoid such conflicts.

Intellectual Property

Our confidential information and intellectual property must be safeguarded and must not be shared with any third party unless expressly permitted by us. Suppliers will not divulge to us any information about their competitors that is not in the public domain. Any authorized transfer of confidential information is to be done in a way that protects intellectual property rights.

Labor and Human Rights

Freely Chosen Employment

All forms of involuntary labour – including forced, coerced, bonded (including debt bondage), involuntary or exploitative prison, slavery, trafficked or indentured or other forms – are prohibited.

Child Labor and Young Workers

Child labour shall not be used. The term “child” refers to any person under the minimum age for employment in the UK.

Freedom of Association and Collective Bargaining

Suppliers shall respect workers’ legal rights to freedom of association and collective bargaining.

Regular Employment Status

Work performed must be on the basis of a recognized employment relationship. Obligations to employees under labour or social security laws and regulations arising from a regular employment relationship shall not be avoided, such as through sub-contracting, excessive use of fixed-term employment contracts, or through apprenticeship schemes with no real intent to impart skills or provide regular employment.

Wages and Benefits

Suppliers shall ensure workers receive wages and benefits that meet, at a minimum, national legal standards. However, we strongly encourage our suppliers to go beyond legal minimum standards and to ensure wages are sufficient to meet basic needs and provide discretionary income such as the Living Wage set by the Living Wage Foundation.

Working Hours

Regular and overtime working hours must comply with the law and not be excessive.

Humane Treatment

All workers are to be treated with respect and dignity. There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment.

Modern Slavery

We require our Suppliers to ensure that slavery and human trafficking are not taking place in any part of their business including their supply chain.

Discrimination

Suppliers shall commit to a workforce free of discrimination.

Health and Safety

Working conditions

Suppliers shall provide a safe and hygienic work environment, as appropriate for the industry, geography and workforce.

- Adequate steps shall be taken to prevent accidents and injuries to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonable and practicable, the causes of hazards inherent in the work environment.
- Workers shall receive regular health and safety training.
- Where needed, workers are to be provided free of charge with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.
- Provide sufficient training of employees and management in handling and disposal of chemicals and other dangerous substances and materials.
- Suppliers shall respect workers' right to refuse unsafe work and to report unhealthy working conditions.

Emergency Preparedness

Potential emergency situations and events (such as fires, medical emergencies, and chemical exposures) are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures. In buildings, emergency exits must be unlocked and unblocked at all times.

Basic services

Workers shall have access to potable drinking water and clean toilet facilities at all times at the workplace and at any company - or the third party - provided housing, as well as sanitary food preparation, storage and consumption areas.

Environmental Sustainability

Resource consumption, pollution prevention and waste minimization

Business is conducted in a manner that proactively embraces sustainability. Suppliers shall optimize their consumption of natural resources, including energy and water.

As a minimum standard, our Suppliers shall always ensure compliance with all applicable environmental laws and regulations

Environmental impact management

Business is conducted in a manner that reduces environmental impact. As such, suppliers will measure and minimize the environmental impact of their facilities and operations, including air and greenhouse gas emissions, water (whether in a production process, for irrigation, or for other uses), contamination and waste.

Hazardous materials and product safety

Suppliers shall identify and reduce the use of hazardous materials, chemicals and substances. Suppliers will also ensure their safe handling, storage and disposal. All applicable employees shall be aware of and trained in related safety procedures.

Implementation

Management Systems

Suppliers will develop and enforce policies and procedures to ensure compliance with all aspects of this Code. This includes ensuring transparent and accurate record-keeping to demonstrate compliance with applicable laws and this Code of Conduct.

Grievance mechanisms

Suppliers shall have systems in place to enable fair, confidential and anonymous grievance reporting and follow-up without fear of reprisal. This includes worker whistleblower protections.

Audits and Corrective Action Process

We reserve the right to verify compliance with the Code and to require the implementation of corrective actions toward meeting this Code of Conduct.

Continuous Improvement

We also recognize that achieving the requirements of this Code is a dynamic process and we encourage continuous improvement within our supply chain. In cases where improvement is required, we will support the supplier to establish clear milestones and processes to support their achievement. Suppliers who ultimately fail to comply may be subject to consequences up to and including termination of business.

Termination of Business

Tatry Group reserves the right to terminate its contractual relationship with any Supplier that does not – or whose sub-suppliers do not – comply with material obligations of the Code or repeatedly breaches any key principle despite being asked to remedy such breach.