

SUPPLIER CODE OF CONDUCT

ABOUT US AND OUR STANDARDS

Sigma Polymer Group is a market leader in the development and production of customized polymer-based solutions for niche applications. The foundation of our business is the ability to create and maintain mutually beneficial long-term relations with our customers, to be an expert in the field of rubber, silicone and polyurethane production, material development and to attract motivated people. We aim to guard this foundation by being committed to conducting our business in a legally, ethically, socially and environmentally responsible manner.

This Supplier Code of Conduct specifies what Sigma Polymer Group (hereby referred as to “Sigma” or “company”) expects and requires from its suppliers regarding human rights, health and safety practices, business ethics and integrity and environmental responsibilities.

Sigma trusts its suppliers to act with honesty, integrity and ethics when supplying products to, performing services for Sigma and expects its business partners, including suppliers, consultants and independent contractors to adhere to standards similar to those reflected in our Supplier Code of Conduct.

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INTRODUCTION

A. PURPOSE AND APPLICABILITY

Sigma requires its supplier to comply with its Supplier Code of Conduct as a part of its own Code of Conduct to ensure prevention and minimisation of any behaviour that may not be complementing its company principles. Additionally, suppliers are expected to respect and comply with the laws and regulations in all countries in which they operate, procure and/or sell goods and services. Sigma expects its suppliers to enforce the standards and requirements outlined in this code throughout their supply chain.

B. SCOPE AND TARGET GROUP

Our Supplier Code of Conducts addresses the ethical behaviour, business practices, employment and labour practices, workplace practices, environmental practices and minimum legal compliances that Sigma expects and requires from its suppliers. Our suppliers, as well as others with whom they do business, including employees, subcontractors and other third parties, are expected to establish and maintain appropriate management systems and actively review, monitor and modify their management processes and business operations to ensure their alignment with the principles set forth in this Supplier Code of Conduct.



HUMAN RIGHTS AND LABOUR PRACTICES

Sigma Polymer Group supports and respects the protection of internationally proclaimed human rights and ensures that company activities are not complicit in human rights abuses, for example, in our relationships with our suppliers and requires the same commitment from its suppliers. The suppliers of Sigma are expected to respect human rights and not to be directly or indirectly involved in any human rights violations at any stage of their business activities.

■ WORKING HOURS AND LABOUR PRACTICES

Sigma expects its suppliers to provide fair compensation and working conditions for all its employees. Working hours (including regular working hours, overtime, days of rest and breaks) shall be set according to the domestic laws in force or industrial standards. Suppliers shall ensure that all employees are informed of their right to know the basic terms and conditions of their employment and understand their employment conditions.

■ CHILD LABOUR AND FORCED LABOUR

Sigma does not tolerate child labour and forced labour in any form. The corresponding laws must be observed regarding child labor and any form of exploitation of children and adolescents. Suppliers of Sigma are prohibited to employ children below minimum legal age of the country.

Employees shall be free to leave their employment after reasonable notice as required by applicable law or contract. Suppliers must not, under any circumstances, use, promote or otherwise give rise to the use of forced or involuntary labour. Such labour practices are, but not limited to, restriction of movement, withholding of wages and/or identity documents.

■ FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Sigma expects its suppliers to respect the right of its employees to establish or join trade unions and representative organizations of their own choosing in line with applicable local legislations. Employees and/or their legitimate representatives shall be provided with an open and cooperative environment to share ideas or concerns with the management without the fear of discrimination, harassment or reprisal.

■ LOCAL PEOPLE AND LAND RIGHT OF COMMUNITIES

Sigma trusts its suppliers to take action to ensure that land rights of communities, including indigenous people, will be protected and promoted.

■ DISCRIMINATION AND HARASSMENT

Sigma expects all its suppliers to treat their employees and agency workers with respect, fairness, and dignity. Sigma Polymer Group condemns discrimination in hiring and employment and expects its suppliers to provide equal opportunities for all their employees to thrive and succeed in. No existing or potential employee should be discriminated because of, for example, race, color, gender, sexual orientation, religion, political view, disability or age. It is required that suppliers guarantee integrity, privacy and freedom of expression to all of their employees and provide a safe and inclusive workplace free of abuse and harassment. Sigma trusts its suppliers to create and implement policies and procedures to ensure a safe workplace.

■ HEALTH AND OCCUPATIONAL SAFETY

The suppliers shall ensure occupational health and safety in the workplace for all their employees and observe domestic and international regulations. This includes supporting risk analyses, training programs and other precautionary measures to ensure that all employees can perform their work in a safe and healthy manner. Sigma encourages its suppliers to appoint a competent person to manage health and safety issues, establish an organizational structure to manage risks and ensure that all employees are trained accordingly.

■ HYGIENE

Sigma gives utmost importance to its employee's personal sanitation by making available washing stations, clean drinking water and disposal of humane waste in correct fashion. It is expected of our suppliers to approach this matter with the same seriousness.

BUSINESS ETHICS AND INTEGRITY

It is important for Sigma to comply with the applicable laws, standards and other legal provisions of the countries in which it operates. In this regard, Sigma expects its suppliers to share the same level of commitment and be aware of the continuous development of international regulations and social standards to be able to adopt those that are relevant to their business practices.

■ ANTI-CORRUPTION AND BRIBERY

Sigma Polymer Group is committed to work against corruption in all its forms, including extortion and bribery. No such illegal activity is tolerated either in action or as negligence by any of our suppliers. Suppliers shall comply with the applicable criminal law on corruption and anti-money-laundering regulations.

■ ENTERTAINMENT, GIFTS AND PERSONAL BENEFITS

Neither supplier employees nor anyone acting on behalf of the said suppliers may solicit, give or receive, directly or indirectly, gifts, gratitude, special allowances or a benefit which could influence the judgement of the recipient or is deemed unreasonable in the context. Suppliers must not offer to pay the travel and overnight stay expenses of Sigma employees for any event they may host or arrange.

■ FAIR COMPETITION

Sigma Polymer Group is committed to fair competition and expects its suppliers to conduct their businesses in line with all applicable laws that protect competition, especially anti-trust laws and other regulations that regulate competition. Suppliers must never engage in any anti-competitive activity such as illegal fixing of prices or sharing of markets.

■ CONFIDENTIALITY AND INTELLECTUAL PROPERTY RIGHTS

Suppliers must ensure that confidential information provided by Sigma and intellectual properties of Sigma are solely used as permitted. The communication of confidential information to third parties or the public is strictly prohibited. Transfer of technical information and know-how is to be done in accordance with intellectual property rights and no information shared by Sigma shall be in any way exploited.

■ CONFLICTS OF INTEREST

Suppliers must disclose any actual or potential conflicts of interest due to either personal or business relationships with anyone, including but not limited to suppliers, business associates, competitors of Sigma Polymer Group or its employees. A conflict of interest occurs when a representative of a supplier seeks to further his or her personal interest, or that of a friend or relative, due to his or her position as a representative of the supplier. Sigma expects its suppliers to inform the company to avoid and eliminate such conflicts of interest.

■ CONFLICT MINERALS

It is expected that suppliers adopt practices that monitor the origin of materials containing Conflict Minerals. Sigma trusts its suppliers to provide materials or parts which are free of Conflict Minerals and relies on its suppliers to provide due diligence documents when a request is made by the company.

■ CHEMICAL COMPLIANCE

Sigma trusts its suppliers to be aware of the international regulations and applicable laws. Products and materials supplied to Sigma must be in compliance with the European Union regulation REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) and directive RoHS (Restriction of Hazardous Substances Directive). Suppliers are expected to assist Sigma by supporting relevant documents when such compliance requests are made.

ENVIRONMENTAL RESPONSIBILITIES

At Sigma Polymer Group we recognize that environmental responsibility is a precondition for the survival and prosperity of all living beings. Consequently, environmental responsibility for us means products should be designed and produced with environmental consideration. Sigma expects the same commitment from its suppliers to actively try to minimize their negative environmental impact and to act where any risks are discovered.

■ CONTAMINATION

Sigma expects suppliers to ensure that their production and procurement processes have no significant negative impact on nature and do not endanger the health of any living creature. Suppliers should avoid soil, water and air pollution and ensure that the production of food or access to drinking water and sanitary facilities are not impaired by their operations. The suppliers shall strive to adopt operation practices that minimizes the negative environmental impact with a focus on their activities, products and services.

GOVERNANCE AND MONITORING OF THIS CODE OF CONDUCT

We at Sigma Polymer Group are committed to conducting business in a legally compliant and ethical manner and we cooperate with suppliers that share these values. As a condition of doing business with Sigma Polymer Group, suppliers are expected to be familiar with our Supplier Code of Conduct and comply with the requirements covered by the Code. The requirements outlined in the Supplier Code of Conduct is in line with Sigma Polymer Groups own Code of Conduct and ethics.

■ REPORTING CONCERNS AND VIOLATIONS: Sigma Polymer Group Whistleblower System

Sigma has established a third-party whistleblower system that enables all employees and other stakeholders including our suppliers to report any violation and suspects of breaches to the Code. If suppliers or their employees become aware of any circumstances that is believed to cause any violations or carries the risk of violating the Supplier Code of Conduct, the supplier shall report the matter through Sigma's external web-based Whistleblowing channel at:

<https://whistle-cc3cb.web.app/sigmapolymergroup>

Sigma expects its suppliers to ensure that no retaliation takes place against employees for reporting concern in good faith. No employee acting in good faith shall be subject to disciplinary measures for providing information concerning suspected violations of law or company policy.

Unless otherwise required by law, all communications will be investigated as appropriate and will be kept confidential by Sigma.

■ NON-COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

Sigma takes violations of Supplier Code of Conduct seriously and carries out investigations appropriately. If a supplier violates any of the requirements contained in the Supplier Code of Conduct, Sigma Polymer Group may take the decision to terminate the business relationship with said supplier. In addition, Sigma may refer the misconduct to the proper authorities, if appropriate.