

Supplier Code of Conduct

1. Introduction

FLONIDAN promotes integrity and ethics in all aspects of its activities.

The financial, social and environmental requirements of sustainable development are fundamental elements in the strategy of FLONIDAN that implements a “Supplier Code of Conduct” (the “Code”). To do so, FLONIDAN has decided to invite its suppliers to take part in this process within their own sphere of action or influence.

This is the purpose of the Code which FLONIDAN asks its suppliers to support. Their level of commitment in this domain is for FLONIDAN one of the deciding factors in selecting suppliers and reviewing them for future business. FLONIDAN will make sure that its suppliers fully understand and comply with the contents of the Code and will take actions deemed necessary to ensure full compliance.

2. Corporate Citizenship

2.1 Respect Employee Rights

Regarding relations with their own staff, suppliers comply with the legal rules and regulations applicable in the countries where they operate as well as the norms set out by the International Labour Organization concerning workers rights, especially in the area of social security, working hours and conditions, compensation and exercising freedom of association. Suppliers undertake not to resort in any way, shape or form, either directly or through their own subcontractors or suppliers to forced or mandatory labour or to child labour. Finally, they must ensure that their working practices are free of any form of discrimination.

2.2 Respect Occupational Health and Safety

For their own activities, suppliers implement a policy aimed at identifying and preventing risks affecting the health and safety for their staff, customers and the communities surrounding their facilities. They must ensure that their employees fully comply with all applicable health and safety instructions when called out to work on sites.

2.3 Respect the Right to Development

Suppliers guarantee their employees a decent standard of living. They participate as much as possible in the development of countries they operate in and with all types of companies with the respect of this Code.

2.4 Respect Conflict Minerals Initiative

In 2010, the United States Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”) regarding, inter alia, the sourcing of conflict minerals as defined in the Act, Section 1502.

The act was passed because of concerns that the exploitation and trade with minerals from the Democratic Republic of Congo (“DRC”) and neighbouring countries was financing armed groups, and thereby fuelling the conflict in DRC region. The conflict minerals within the scope of the Act were, and still are, columbite tantalite (used to produce tantalum), cassiterite (used to produce tin), wolframite (used to produce tungsten), gold, or their derivatives. Tantalum, tin, tungsten and gold are also known as “3TG” minerals.

Notwithstanding that FLONIDAN is not subject to the Act, recognizing our responsibility as a global player and wanting to support our customers in terms of their legal obligations, FLONIDAN expects its suppliers to make sure that products supplied to FLONIDAN are DRC Conflict Free (“DRC Conflict Free” is defined to mean products that do not contain minerals that directly or indirectly finance or benefit armed groups in DRC or an adjoining country). In addition, FLONIDAN expects its suppliers to be able to demonstrate, upon the request of FLONIDAN, that any products supplied are DRC Conflict Free.

3. Committed to the Environment

3.1 Suppliers implement policies on managing and improving their manufacturing processes, which are to limit environmental impact throughout the life cycle of the products they supply. In particular, they strive in their respective domains to:

- reduce impact on ecosystems and biodiversity
- optimize consumption of natural resources and energy
- reduce emissions of greenhouse gasses, pollutants and volatile organic compounds, and
- reduce quantities of waste released and develop recycling and recovery solutions.

3.2 Suppliers have full traceability in their production and/or supply chain of all materials originating from all sources. Without limiting Clause 2.4 (Respect Conflict Minerals Initiative), raw materials and components used in the manufacturing are to the broadest extent possible traceable.

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4. Committed to Legal Compliance

4.1 Suppliers carry on their activities in strict compliance with applicable domestic and international legal standards. In particular:

- They prohibit any actions liable to falsify or distort free competition or market access or infringe applicable legal rules concerning competition law
- They reject any form of active or passive corruption in domestic or international transactions, including extortion and bribery, and
- They do not give or receive bribes to obtain undue or improper advantage and they refrain from offering expensive gifts (gifts can include goods, services, personal discounts, vouchers, favours, loans, trips etc.) and extravagant entertainment to FLONIDAN purchasers or other counterparts in FLONIDAN in an attempt to influence business decisions.

4.2 Suppliers agree to sell only products that comply with national, European and International laws and regulations, as required by the country of distribution. Suppliers must be mindful that their own suppliers allow them to fully adhere to the principles detailed in this Code.

5. Ethical Behaviour

5.1 Suppliers shall, within their sphere of influence, respect and support the UN Global Compact, including among others the following set of core values and principles in the areas of human rights, labour standards and the environment:
Suppliers shall

1. Support and respect the protection of internationally proclaimed human rights
2. Make sure that it is not complicit in human rights abuses
3. Uphold the freedom of association and the effective recognition of the right to collective bargaining
4. Support a precautionary approach to environmental challenges
5. Undertake initiatives to promote greater environmental responsibility, and
6. Encourage the development and diffusion of environmentally friendly technologies

5.2 FLONIDAN expects its suppliers to adhere to the highest standards of moral and ethical conduct.

Receipt and agreement

The undersigned Supplier acknowledges receipt of this Supplier Code of Conduct and agrees to comply with its provisions in the course of its business relationship with FLONIDAN.

Name of Supplier company: _____

Name: _____

Title: _____

Signature: _____ Date: _____