



Supplier Code of Conduct

Orion Engineered Carbons (ORION)

Document No.	02	Effective Date	December 11 th , 2023	Revision No.	1
Supersedes	Document No. 1	Next Review Date	November 2024	Issue No.	02
Contact Officer	Michael Sojka / michael.sojka@orioncarbons.com				

Driving Sustainability together with our supply partners.

Introduction

Purpose

At ORION, our suppliers are fundamental to our business operations. Therefore, we expect our suppliers to share our commitment to conducting business with a focus on compliance and sustainability. This means that aside from striving to ensure safe products of high quality along the global supply chain, we also strive to source products and services with our three core ESG (Environment, Social and Governance) pillars in mind. For this purpose, ORION has implemented for our suppliers this Code of Conduct, which covers all key aspects of compliant and sustainably focused business operations.

Scope

At ORION, we expect suppliers to comply with the requirements and responsibilities described in this document covering ESG aspects. Suppliers are required to provide safe working conditions; treat workers with dignity and respect; act fairly and ethically; and be environmentally responsible. This Supplier Code of Conduct delivers guidance and establishes a common set of values. Therefore, it is our duty to communicate these standards to ensure commitment also from our suppliers. This document applies to all our suppliers. We expect our suppliers to replicate these standards down its own supply chain in order to continue their business relationship with ORION.

Compliance with this Code of Conduct

- The supplier shall ensure compliance with or exceed its obligations set out in this Code of Conduct for Suppliers.
- The supplier must collaborate with ORION concerning issues stated in this Code of Conduct, as well as other ESG issues that might fall outside its scope.
- Upon the request of ORION, the supplier shall provide reasonable evidence of its compliance with this Code of Conduct.
- The supplier is expected to share this document or a comparable set of standards with its agents and sub-contractors.

The supplier shall grant ORION the right to evaluate its ESG performance upon reasonable prior notice to determine the supplier's conformance with principles outlined in this Supplier Code of Conduct. The evaluation can be executed directly by ORION or by a qualified third party in the form of an assessment or an audit.

Legal Requirements, Laws, and Regulations

- The supplier must comply with all local, regional, national, and international laws and regulations that apply to its operations or are otherwise applicable in the countries it conducts business in.
- The supplier shall implement management systems to facilitate adherence to all applicable laws and regulations.
- The supplier shall strive to align its sustainability efforts with internationally recognized standards provided by the UN, EU and other such organizations.

Breach of this Code of Conduct

In the event the supplier acts against or breaches one or more of the obligations set forth in this document or cannot agree on an improvement plan, ORION reserves the right to either partially or entirely terminate the cooperation, supplier agreement or contract without incurring any liability as a consequence of this termination.

Examples of violations include but are not limited to:

- Breaching laws or governmental regulations.
- Ethical misconduct (corruption, bribery, anti-competitive practices etc.).
- Workplace violations (health and safety, working conditions, etc.).

The Code of Conduct

1. Environmental Compliance

1.1. The supplier shall take responsibility for its impact on the environment.

1.2. The supplier shall strive to reduce its energy consumption and greenhouse gases emissions wherever reasonably possible.

1.3. The supplier shall strive to reduce its raw material usage and recover waste where reasonably possible to support the move towards circular business processes.

1.4. The suppliers shall undertake reasonable efforts to have a management system in place to control, recover and reduce water consumption, especially in water-scarce areas as defined by the World Resource Institute (<https://www.wri.org/water>).

2. Social Compliance

Occupational Health & Safety

2.1. The supplier shall, across all its operations, provide for a safe and healthy working environment that minimizes health and safety risks to employees and third parties. Wherever appropriate the supplier shall provide access to safe water, sanitation, and hygiene in the workplace according to WASH standards (UN Global Compact: <https://wash4work.org/wash-pledge/>).

Working Conditions

- 2.2. The supplier shall provide equal opportunities to its employees. This means that under no circumstances discrimination based on race, age, sex, gender, sexual orientation, religious beliefs or political views shall occur.
- 2.3. The supplier shall ensure employee working hours, (minimum) wages and conditions are in line with the requirements of the respective applicable jurisdiction, and employees are granted a minimum of one day off every seven-day period.
- 2.4. The supplier shall not tolerate any form of abuse or harassment of employees. This pertains to psychological, physical, sexual or verbal abuse and covers any form of intimidation, threat or harassment.
- 2.5. The supplier shall uphold the freedom of association and the effective recognition of the right of collective bargaining for workers.

Child and Forced Labor

- 2.6. The supplier shall not be complicit in any human rights abuses. The supplier shall always and at all its locations respect the rights of children to a childhood free of labor, thereby ensuring that no child labor of any sort is used throughout its operations. Child labor is defined as the employment of young people under the age of completion of compulsory schooling or younger than 15 years.
- 2.7. The supplier is not permitted, under any circumstances, to use forced labor in its operations. Forced labor, as defined by the International Labour Organisation (ILO), includes but is not limited to forced, indentured and bonded labor, involuntary prison labor, modern slavery and the trafficking of people.

3. Governance Compliance

- 3.1. ORION has no tolerance for instances of corruption, bribery or fraud. In practice, this means that no supplier in collaboration or cooperation with ORION may engage in any form of corruption, bribery or fraud.
- 3.2. The supplier shall not offer or accept any form of gift or payment in exchange for improved opportunity or benefit, in particular with regards to supplier contracts or governmental actions.
- 3.3. The supplier shall not partake in any form of anti-competitive behavior including but not limited to price fixing, product dumping, refusal to deal, dividing territories or protectionism.
- 3.4. The supplier ensures adequate information security across its entire organization, referring to both digital and physical information.