



Omya Business Partner Code of Conduct

1. Introduction

Omya is committed to conducting business in an ethical, legal and socially responsible manner while aiming for high standards and sustainable practices. Our ethical compass, Omya's Code of Conduct, ensures we always do the right thing. We rely on strong business partners who comply with the law, respect the environment and human rights to contribute to our sustainable growth. Our business partners must acknowledge and comply with the Business Partner Code of Conduct or have standards of their own that at a minimum adheres to the principles laid out in the Omya Business Partner Code of Conduct to ensure responsible supply chain management. Adherence to our Business Partner Code of Conduct is a significant part of how we approach Business Partner selection and evaluation.

2. Scope

All distributors, suppliers, service providers, agents and other business partners, along with their subsidiaries, employees and subcontractors, who provide Omya with products, materials, expertise, and services worldwide (referred to as "**Business Partner**"), are subject to this Business Partner Code of Conduct. The code establishes the basic mandatory standards that every Business Partner should meet and complements their obligations under contractual agreements and applicable laws.

3. Business Partners must comply with the law as a "fundamental rule"

Business Partners are required to comply with the law, i.e., to comply with all local, national and international laws applicable to their place of business, place of performance, place of delivery and final destination of products and services, as well as to comply with their internal policies. In addition, Business Partners are expected to go beyond legal compliance and strive to maintain high standards in the areas of social, human and labor rights, environmental protection and anti-corruption.

4. Main Principles

4.1 Business Partner – Internal Conduct

4.1.1. Risk Management

Business Partners are required to have an efficient risk management process that covers all risks addressed by this Business Partner Code of Conduct, and must document their risk management activities. The Business Partners' risk management process must encompass a review and documentation across their entire supply chain.

4.1.2. Health & Safety

Business Partners must offer safe and healthy workplaces for their employees while respecting their rights and privacy. They should proactively work on mitigating workplace hazards to prevent injuries and illnesses. They must also have the necessary licenses, permits, and approvals from competent authorities for their operations.



4.1.3. **Labor Practices**

Business Partners uphold workers' human rights by providing secure and fair working conditions, fair payment, and benefits. They do not use forced, involuntary, bonded, indentured or prison labor and commit to complying with all standards prohibiting slavery and oppression in the workplace.

4.1.4. **No Child Labor**

Business Partners comply with applicable laws and international conventions that prohibit the use of child labor.

4.1.5. **Freedom of Association**

Business Partners honor the rights of workers outlined in local laws, particularly their freedom to associate to form unions and engage in collective bargaining.

4.1.6. **No Discrimination**

Business Partners maintain a workplace that is free of discrimination or harassment, including sexual, racial, religious, and other forms of discrimination, whether verbal, physical or otherwise. They base employment-related decisions solely on relevant and objective criteria.

4.1.7. **Privacy**

Business Partners protect the confidentiality and proper use of personal data and confidential information to guarantee compliance with data privacy laws.

4.1.8. **Accounting and Taxation**

Business Partners comply with applicable accounting and taxation principles, ensuring transparent and accurate financial disclosure and proper retention of documents and records in accordance with regulations.

4.2 **Business Partner – External Conduct**

4.2.1. **Environment**

Business Partners prioritize environmentally responsible operations by reducing emissions, energy and water consumption, minimizing waste and avoiding harmful pollution and noise emissions. They also comply with regulations that prohibit unlawful eviction, mercury-added products, and non-environmentally sound handling and disposal of hazardous waste. Appropriate management systems should be in place to prevent spills and waste.

4.2.2. **Transparency**

Business Partners ensure transparency and openness in their dealings with Omya by providing information on material flows, origin and production conditions throughout the supply chain. They prove product identity and ensure that no adulteration occurs, with the goal of delivering responsibly produced products.

4.2.3. **Fair Competition**

Business Partners believe that free, fair and open competition ensures high quality and innovative products and services. They avoid improper actions that exclude, restrict or distort competition or could be perceived as being unfair-dealing practices.

4.2.4. **Anti-Bribery and Corruption**

Business Partners must abstain from engaging in any form of corruption and bribery. This includes refraining from any direct or indirect acts of bribery or facilitation payments, with the explicit purpose of unjustifiably influencing public officials, the judiciary, and/or representatives involved in a business relationship, including employees of Omya.



4.2.5. **Gift and Entertainment**

All gifts and entertainment provided shall be modest, reasonable, infrequent and not offered or received for the purpose of obtaining or retaining business with Omya.

4.2.6. **Sanctions & Money Laundering**

Business Partners must comply with relevant trade and economic sanctions and are prohibited from facilitating money laundering, either directly or indirectly through intermediaries.

4.2.7. **Conflict of Interest**

Business Partners will refrain from any activity or interest that could interfere with their business relationship with Omya. They will promptly disclose to Omya any actual or potential conflict of interest in accordance with applicable laws.

4.2.8. **Intellectual Property**

Business Partners respect the intellectual property rights of Omya and other entities and refrain from any actions that could cause harm to them.

4.2.9. **Conflict minerals**

Business Partners shall ensure that they do not supply materials and products containing minerals that contribute to conflict by applying the due diligence procedures in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or laws of a similar nature.

4.2.10. **Whistleblowing System**

Business Partners must establish a comprehensive internal or external complaints procedure throughout their supply chain that allows individuals to report any compliance issues, including human rights and environmental risks. The complaints procedure should be easily accessible, maintain confidentiality, and protect complainants from any adverse actions. Business Partners must provide clear and accessible information on the complaints procedure's accessibility and implementation. The procedure's effectiveness must be reviewed annually.

4.3 **Due Diligence, Concerns and Non-Compliance**

4.3.1. **Due Diligence**

Omya reserves the right to conduct periodic or unscheduled reviews and assessments of both current and prospective Business Partners to ensure their compliance with this Business Partner Code of Conduct. Alternatively, and at Omya's sole discretion, these reviews may also be conducted by specialized independent third parties.

4.3.2. **Concerns**

Any concern or actual or potential non-compliance discovered by any Business Partner or an employee or a third person can be reported to the publicly open Integrity Line via [Omya | Home \(integrityline.io\)](https://integrityline.io).

4.3.3. **Non-Compliance**

If Omya finds a severe or potential violation of the Business Partner Code of Conduct, it will take corrective action promptly. If the Business Partner cannot fix the issue in a reasonable timeframe, Omya will create a plan with specific actions and a timeline to resolve the violation. Omya will monitor progress and can suspend or terminate the relationship for a fundamental principle breach. Legal action and damages may also be pursued if necessary.



The Business Partner acknowledges by its signature that it understands and accepts the Omya Business Partner Code of Conduct and hereby agrees to the following:

(please tick the appropriate box)

- To comply with the Omya Business Partner Code of Conduct.
- 1. Agrees to Section 4.3
- 2. To have its own Code of Conduct that is at least equal to the principles set forth in the Omya Business Partner Code of Conduct. A copy of the Code of Conduct is attached to this document.

Name :

Job Title :

Company :

Date :

Signature :