

# **Code of Conduct**

### **For Sulphurnet Business Partners**

Each of Sulphurnet's Business Partners, including suppliers, distributors, agents, resellers, and joint venture partners, are recognized as an important member of the worldwide team contributing to Sulphurnet's success. Our goal is to develop relationships with Business Partners that share our similar corporate values of Ambition, Curiosity, Collaboration, and Accountability, and conduct business in an ethical manner.

Sulphurnet takes into account internationally recognized and endorsed standards in key areas such as international human rights, business ethics and labour conditions. We expect our Business Partners to do the same and are committed to working only with partners that fulfill this requirement. Failure to comply with this Code of Conduct for Sulphurnet's Business Partners may result in discontinuance of business relationships.

# RESPECT FOR PEOPLE, HUMAN RIGHTS AND APPROPRIATE WORKING CONDITIONS

#### Safe and Healthy Work Environment

Sulphurnet expects employees at our Business Partners to be provided with a safe and healthy workplace in compliance with international standards and national laws.

#### Discrimination

Sulphurnet takes the issue of discrimination very seriously. We require that all employees in our joint venture operations be treated with respect and dignity, and that equality of opportunities are based solely on merit, irrespective of race, colour, religion, gender, age, national origin, sexual orientation, marital status, or disability. All Sulphurnet's Business Partners must commit to creating a fair work environment and to abide by all applicable local laws concerning discrimination in hiring and employment practices.

#### **Child or Forced Labour**

Sulphurnet will not use involuntary labour, bonded, or forced labour or let anyone do so on our behalf. Any use of child labour by Business Partners must comply with internationally recognized standards such as the guidelines of UNICEF, and the ILO, as well as local legislation.

# Freedom of Association

Sulphurnet expects its Business
Partners to respect and uphold their
employees' freedom of association
involving trade unions or similar
external representative organizations.
Their employees should also have the
right to collective bargaining in
accordance with applicable laws and

regulations, as well as the right for employees to elect not to join a trade union or other representative body.

# PROTECTION OF THE ENVIRONMENT

Sulphurnet constantly strives to reduce any environmental impact arising from our activities.

Business Partners are encouraged to develop and implement an environmental policy.

Business Partners are expected to operate in compliance with all applicable laws and regulations addressing environmental protection.

Sulphurnet encourages Business Partners to develop and use environmentally friendly technologies, products, and services.

#### **ETHICS AND BUSINESS INTEGRITY**

#### **Bribery and Corruption**

Sulphurnet expect its Business Partners to uphold the highest standards of business ethics, to respect local laws and not to engage in any form of corruption, bribery, fraud, facilitation payments, or extortion. Sulphurnet considers facilitation payments as a form of corruption and has a zero-tolerance policy for such payments.

#### **Money Laundering**

Sulphurnet conducts business with high integrity and within the bounds of the law. We will not allow our Business Partners to condone or support money laundering in any form in any location on behalf of Sulphurnet.

#### **Fair Competition**

Sulphurnet strictly prohibits anticompetitive agreements or conduct, including, amongst others, fixing prices, restricting the supply of goods or services, bid rigging and market sharing. We require our Business Partners to be committed to free and fair competition and to abide by relevant competition laws and regulations.

#### **Confidential Information**

Sulphurnet is dedicated to protecting confidential and personal information. Business Partners are expected to comply with all applicable laws and regulations governing the protection, use and disclosure of Sulphurnet proprietary, confidential, and personal information.

#### **Conflicts of Interest**

Sulphurnet expects its employees and Business Partners to immediately identify and address situations where there is an actual conflict of interest, or even the appearance of a conflict of interest.

### MISUSE OF PRODUCTS

In line with our strong commitment and adherence to applicable legal and regulatory obligations, Sulphurnet will not tolerate the misuse of our products for illegal purposes. This includes, but is not limited to, the misuse of finished products, intermediates, and raw materials in the production of illegal drugs and illegal explosives. In our resolve to strengthen legal and regulatory frameworks, Sulphurnet continuously raises awareness of its Business Partners to their obligations to have implemented adequate monitoring systems within their supply chains to ensure that misuse is prevented or can be detected and remediated immediately.