

TSG's Supplier Code of Conduct

As UN Global Compact signatory, TSG is committed to sustainability in all its business activities and aims to apply the highest ethical standards. In support of this goal, TSG demands strict adherence to our principles for labor, environment, health and safety as outlined in this Code of Conduct. TSG's suppliers play an important role as enablers of our company's sustainable growth and overall success.

In this document TSG has set forth principles that are instrumental for dealings with suppliers as well as specifying applicable standards. These principles respond to key social, environmental and societal issues identified by TSG in its CSR supply chain risk mapping. TSG expects its suppliers to strictly observe and comply with all the principles expressed herein, in all of their activities and sites worldwide.

1. Principles

- a. TSG requires that its suppliers' business behavior must be in compliance with all applicable international, national and local laws and contractual terms, as well as the United Nations Universal Declaration of Human rights and the International Labor Organization (ILO) conventions on labor. TSG requires its suppliers to act in a socially responsible and ethical way. + global compact
- b. The principles of the TSG Suppliers' Code of Conduct shall also apply to third parties (subcontractors) if supplier have outsourced parts of their contractual obligations.

2. Ethics

Suppliers will conduct their business in an ethical manner and act with integrity:

- a. Fair Competition
Suppliers will be committed to working against corruption, including extortion and bribery. Suppliers shall conduct their business using fair business practices, consistent with fair competition and in compliance with all applicable laws, rules, and regulations.
- b. Business Integrity
Suppliers shall refrain from proposing to any TSG employees any sum of money, gifts, loans or valuable objects, with the exception of presents or promotional gifts of an insignificant monetary value, which are in accordance with local customs and all applicable laws, rules, and regulations.
Suppliers are strictly prohibited from making or attempting to make payments with the intention of influencing an official action or decision, securing an improper advantage, or persuading individuals to

exert their influence with a government or administration in a manner that would obtain, retain, or direct business towards their company or TSG.

- c. Identification of Concerns
Suppliers shall encourage their workers to report concerns or illegal activities within their workplace without threat of reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action where needed. All reported cases will be officially recorded by suppliers.
- d. Privacy
Suppliers shall secure and use properly any confidential information made available by TSG in order to ensure that the privacy rights of the company, its employees, and its customers are protected.

3. Labor

- a. Forced Labor
Suppliers shall not subject their employees to forced labor, servitude, human trafficking, or slavery, as well as practices such as the retention of identity papers, training certificates, work permit or any other document.
- b. Child Labor and Young Workers
Suppliers should not employ labor who do not have the minimum age required to work as defined in the ILO conventions. No hazardous work nor night work shall be entrusted to young people under the age of 18.
- c. Fair Treatment
Inhumane treatment and/or physical punishment, of workers are prohibited.
- d. Nondiscrimination
Any discrimination in hiring, training, promotion, compensation, etc. based on race, color, gender, age, sexual orientation, religion, political affiliation, union membership, marital status or any additional illegally discriminatory characteristic is not acceptable.
- e. Wages and fringe benefits
Work hours, minimum wages and overtime hours paid to employees as well as the fringe benefits must be in compliance with the applicable regulations.
- f. Freedom of Association
Suppliers should encourage their employees to communicate freely with their superiors concerning working conditions, compensation. etc., without fear of reprisals, intimidation, or harassment.

Employees should be free to join any trade union of their choice, to seek representation, and join workers councils.

4. Health and Safety

Suppliers must provide a safe and healthy working environment, including any company-provided living quarters. Suppliers should have a health & safety organization to define, implement, and follow up on policies and management systems that include compliance with local and national regulations. The health and safety elements should include:

- a. Workers' Health and Protection
The suppliers shall protect workers from overexposure to chemical, biological and physical hazards in the workplace as well as from risks associated with any infrastructure used by their employees.
- b. Maintenance, Emergency Preparedness and Response
Suppliers shall have programs in place to operate and maintain all operations in the safest manner possible. Suppliers shall identify and assess possible emergency situations in the workplace and minimize their impact by implementing emergency response plans and procedures.
- c. Process Safety
In particular the suppliers shall have programs in place to prevent or mitigate catastrophic release of chemicals.
- d. Hazard Information and Training
Safety information shall be available to educate, train, and protect workers from hazards. This includes safety information about hazardous substances used: chemicals, pharmaceuticals, intermediate products, etc.

5. Environment

Suppliers should ensure that their activities have a minimal impact to the environment. Suppliers must operate as environmentally responsibly and efficiently as possible. Suppliers are encouraged to use their best efforts to reduce or eliminate emissions generated by their activities, to preserve natural resources, to avoid or minimize the use of hazardous substances, and when possible to promote waste recycling or reuse.

- a. Environmental Authorizations
Suppliers shall ensure compliance with all applicable regulations and recommendations relating to environmental protection in force within the countries where they carry out activities. All required environmental permits, licenses, registrations, etc., shall be obtained and their operational/reporting requirements followed.

- b. Waste and Emissions
Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, management of waste, air emissions, and wastewater discharge. Any waste, wastewater or emissions shall be measured, tested, controlled, and (if required) treated prior to release into the environment. Waste should be reused or recycled where possible.
- c. Spills and Releases
Suppliers need to have systems in place to prevent and mitigate accidental spills and releases into the environment. Emergency procedures and personnel should be in place to treat any accidental event presenting an environmental risk.

6. International Business Transactions

- a. Sanctions and Boycott
Suppliers must comply with all applicable laws, policies and regulations governing imports and exports, including international and European Union sanctions, foreign boycotts, and embargoes everywhere they carry out their businesses.
- b. Authorizations
Suppliers are required to obtain all required authorizations for the import and export of goods and services.
- c. These rules also apply to the transmission of technical data and payments.

7. Internal Measuring Procedures

Suppliers should possess internal measuring procedures, tools, and indicators required to guarantee adherence to the principles mentioned in this policy.

8. Information

False information must not be given to TSG in the course of TSG's supplier screening/ assessment and commercial negotiation.

9. Termination of Agreement

Suppliers shall accept the conduct of an audit related to the topics covered by *TSG's Code of Conduct* at the request of TSG. The audit might be performed by TSG or a third party commissioned by TSG.

In the event that TSG becomes aware of any actions or conditions not in compliance with this Code, TSG reserves the right to request corrective actions and the right to terminate any agreement with any Suppliers who do not comply or violate this Code unless our supplier agreement provides otherwise.