

# Supplier Code of **Conduct**







### **Introduction**

We, Cimpor Portugal Holdings, SGPS, S.A. its subsidiaries and/or Affiliated Companies that are located in different countries and regions (hereafter referred to "We", "Company", "Cimpor Group" or "Cimpor") believe that knowing how to manage emissions, protect our business from the impact caused by climate change and protect the health and safety of workers are business strategies that create long term value for shareholders. Combining our work with local organizations and authorities as well as with sustainable business models is the kind of future we are striving for. In addition, it is essential to us that our business relations and activities always are performed in line with applicable laws and regulation.

We experience from our customers and a number of other parties increased interest in work conditions, labor rights, environment and anti-corruption. As part of our ongoing commitment to strong relations with our suppliers, our code of conduct aims to reinforce the transparency and reduce uncertainty about our expectations. The Supplier Code of Conduct (the Code), is an important part of our cooperation with our suppliers and we find it a natural part of the ongoing dialogue between suppliers and us. The Code is applicable globally and acts as basis for all contractual relations with us.





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### **General Requirements**

The Code applies to you as our supplier and all companies within your group (in to following jointly referred to as only “you”) and to the individuals who represent our Company against third parties (all of whom jointly referred to as “Stakeholders”). In addition, you shall comply with applicable local laws and regulations in the countries in which it operates.

We anticipate that you, as our direct supplier, shall endeavor to ensure compliance with the Code from your direct suppliers and exercise diligence in ensuring the principles of the Code are adhered to in their supply chains.

### **Supplier Behavior**

It is a general requirement that you comply with the ten UN Global Compact principles. In addition, it is important to highlight the following required principles:

#### **Ethics, Transparency, Fairness, Professionalism**

In business dealings, you shall observe the principles of loyalty, fairness, transparency, efficiency and market orientation, regardless of the importance of the deal.

All actions, transactions and negotiations carried out by you and, more generally, the people behavior in their daily tasks shall be inspired by the highest accuracy, the completeness and transparency of information, the legitimacy, both in form and substance, and the clarity and accuracy of accounting records in accordance with regulations and internal procedures.

In full respect of the principle of good faith, you should work with impartiality to guarantee the principle of independence of judgment and the absence of any commercial or financial interest, which might determine unequal treatment. You must base your conduct on respect, cooperation and mutual collaboration.

All forms of discrimination based notably on age, racial or ethnic origin, nationality, political opinions, religious beliefs, gender, sexuality or health situation are forbidden.





Bribes, illegitimate favors, collusion, requests, directly and / or through third parties, with personal benefits for oneself or for others, are prohibited without any exception.

When you make transactions involving money, goods or other items of economic value related to us, you must provide appropriate evidence to allow the verification of these transactions.

You must carry out your activities in compliance with the implemented legislation in the countries and regions where you operate in.

In case of any possibility of doubt, or need for further clarification of the Code, please contact your local contact or report to our Ethics hotline.

### **Conflicts of Interest**

In carrying out all activities, you shall strive to avoid running into real or even merely potential conflicts of interest. "Conflict of interest" is - in addition to those defined by law - understood as the case in which a person works to satisfy an interest to gain an advantage for themselves or third parties.

### **Competition and Money Laundering/Financial Crime**

We consider the respect of competition as an essential tool for the development of the economic system and, therefore you shall, adhere in all of your activities with national, EU and local/international rules where you operate.

You should never be engaged or involved in activities that involve the financial crimes of (i) contradicting international sanctions, (ii) money laundering and financing of terrorism, (ii) forgery, tax evasion and/or (ii) bribery and corruption in any form or manner.

Moreover, you should check in advance the available information (including financial information) on business partners and suppliers, in order to ascertain the respectability and legitimacy of their activity before establishing any business relationship.

You should have a grasp of the CIMPOR Sanctions Policy Statement published on the CIMPOR Group website, and act accordingly.

You must always comply with applicable laws in any jurisdiction to avoid from financial crimes risks.







### **Official Contact with Public Offices**

You must acquire a written permit before contacting public offices on behalf of CIMPOR.

In cases of contact with a public office, you must consult with the Compliance Department for any step that must be taken by CIMPOR, for possible questions.

### **Protection of Individuals**

You shall recognize the centrality of human resources, with regard to professionalism, dedication, loyalty, honesty and a sense of collaboration, in all countries in which you operate.

You shall offer all employees the same opportunities and expressly prohibit any form of abuse of positions of authority or coordination. For abuse, it is intended any behavior which consists in asking, encourage to offer, services, personal favors or other benefits damaging another's dignity, professionalism and autonomy.

As provided by national and international regulations, you are required to refrain from engaging in unlawful conduct harmful to individuals, such as, but not limited to, offenses against the person, child labor, trafficking people and child abuse.

You shall carry out your activities in accordance with current national and international legislation for the protection of working conditions, the respect for personal dignity, favoring the consolidation of a culture of safety and health of workers within the workplace through the distribution of adequate information aimed at enhancing awareness of the risks and responsibilities of individual behavior.

### **Protection of Health, Safety and Environment**

The expertise we have developed is for us a fundamental resource which must be safeguarded. You may therefore not disclose any information regarding our technical, technological and commercial expertise, as well as any other non-public information relating to us except where such disclosure is required by law or other regulatory provisions, or within the scope of a Confidentiality Agreement after being expressly authorized by the Company.

You shall not use partially or as a whole CIMPOR's trademarks, logos and/or other intellectual property rights without prior written permission.



The confidentiality obligations must continue after the termination of our business relationship.

If you receive any personal data from us, you must comply with all applicable laws and leading practices for the protection of the confidentiality of the data throughout the data lifecycle.

### **Internal Control and Risk Management System**

You are required to promoting and maintaining an adequate internal control and risk management system, to be understood as the set of all the instruments necessary or useful to guide, manage and monitor the business activities in order to ensure compliance with the laws and company procedures to protect company assets, to manage efficiently and effectively the processes and to provide accurate and complete accounting and financial data to create added value for all stakeholders.

### **Relations of Suppliers with Cimpor Global Group Employees**

Suppliers are forbidden to:

- offer gifts or other benefits to group employees, except for those of modest value or in accordance with normal commercial practice
- propose a job offer and/or hire Cimpor Group employees

### **Monitor and Remedial Action**

Ensuring the principles of sustainable development in our supply chain is important to us. You may acknowledge the principles stated above or demonstrate your commitment via compliance with your own code of conduct or company policies that embrace these standards. Cimpor Group reserves the right to request conduct audits or assessments to confirm such compliance. Cimpor Group reserves the right to discontinue any relationship for non-adherence to international principles, failure to correct violations, or displaying patterns of non-compliance with these standards.

This Code of Conduct encourages the reporting of possible violations within the framework designed by the CIMPOR Group Compliance Program and the Company policies. Stakeholders must contact the Compliance Department via ethics hotline channels below, or in writing in the event

that they detect a violation due to their own acts or neglects, or due to any conducts by their employees or competitors:

- [www.cimporethico.com](http://www.cimporethico.com) or
- [ethico@cimporethico.com](mailto:ethico@cimporethico.com)

Such notifications will be examined by the Compliance Department with sensitivity and according to a strict confidentiality principle. The Company shall not allow any reprisal or discrimination against the people who made the notification in good faith.



ADDENDUM-1: COMMITMENT DOCUMENT FOR STAKEHOLDERS

As the authorized signatory for .....,  
(.....) we accept and undertake to comply with the abovementioned principles.  
(.....) we declare that we do have an Ethical Code of Conduct in force.

Name: .....  
Title: .....  
Date: : .....  
Signature: .....

ADDENDUM-2: ETHICS HOTLINE CHANNELS

**(i)** You may make a notification at [www.cimporethico.com](http://www.cimporethico.com) with the following username and password.

Username: Cimpor

Password: Cimpor2018

**OR**

**(ii)** You may send an email to [ethico@cimporethico.com](mailto:ethico@cimporethico.com) OR

**(iii)** You may send mail to the address below:

Mr.Ozge Ascioğlu

Parnassusweg 819 1082 LZ Amsterdam, Netherlands OR

**(iv)** You may report by telephone through the following numbers:

Türkiye: +90 (212) 979 70 33

Portugal & Cape Verde: +90 (212) 979 70 31 - 308814644

The Netherlands: +90 (212) 979 70 34 - +31 85 208 9031

Romania: +90 (212) 979 70 32 - 376 300 338

Ivory Coast: +90 (212) 979 70 36

Cameroon: +90 (212) 979 70 40





[cimpor.com](http://cimpor.com)