

## Supplier Code of Conduct (2026)

A Supplier in this Code of Conduct is defined as any non-Elchemy entity that provides goods or services to Elchemy, including product suppliers, service providers, distributors, agents, consultants, and others.

### 1. Introduction and Scope

Elchemy Inc. ("Elchemy") is committed to conducting business with the highest degree of law and business ethics. A **Supplier** is defined as any non-Elchemy entity providing goods or services, including product suppliers, service providers, distributors, agents, and consultants. Elchemy aligns its principles with the **UN Global Compact**, the **Universal Declaration of Human Rights**, and the **ILO Declaration on Fundamental Principles and Rights at Work**.

### 2. Good Governance & Business Practices

- **Anti-Corruption:** Suppliers must not engage in corrupt practices, including soliciting, giving, or receiving bribes, unlawful facilitation payments, or kickbacks.
- **Fair Dealings:** Suppliers shall not take advantage of others through unfair business dealings or gain an undue/unlawful advantage.
- **Public Officials:** Interactions with public officials or politically exposed persons must be conducted with care to ensure no unlawful business advantage is obtained.
- **Anti-Money Laundering:** Suppliers shall take appropriate measures to prevent money laundering and fraud, including informing or training relevant employees.
- **Conflicts of Interest:** Business and employee interests must be strictly segregated to ensure decisions are made based on an objective process.
- **Books and Records:** Suppliers must maintain accurate records and never alter them to misrepresent underlying transactions. For international trade, records of **country of origin**, tariff status, and import/export values must be maintained.
- **Fair Competition:** Suppliers shall adhere to all applicable antitrust and competition laws.



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- **Privacy:** Suppliers must adhere to applicable data protection laws regarding the data of customers, employees, and other business partners.

### 3. Human Rights & Working Conditions

- **Fair Treatment:** The working environment must be free from harassment, corporal punishment, torture, coercion, verbal abuse, and discrimination.
- **Freedom of Association:** Suppliers must respect the rights of employees to associate freely, join unions, and engage in collective bargaining without disadvantage.
- **No Involuntary or Child Labor:** Elchemy does not tolerate any form of involuntary, forced, bonded, indentured, or prison labor. Laws relating to the employment of underage employees in legitimate apprenticeship programs must be strictly observed.
- **Wages and Hours:** Employees must be remunerated with at least the minimum wage required by law and provided all mandated benefits. Working hours must not exceed legal maximums.
- **Occupational Health and Safety:** Suppliers shall provide a safe environment, safeguarding employees through safety training and appropriate **Personal Protective Equipment (PPE)** .
- **Whistleblowing:** Suppliers must provide a protected channel for employees to report violations without fear of retaliation.

### 4. Environmental Responsibility

- **Compliance:** Suppliers shall comply with all applicable health, safety, and environmental laws, obtaining all required permits and registrations.
- **Hazardous Substances:** Hazardous substances must be identified, managed, stored, and transported in accordance with the law.
- **Emissions:** Suppliers shall take appropriate measures to reduce greenhouse gas emissions, driving continuous improvements toward scientifically based targets.
- **Conflict Minerals:** Products must not contain metals derived from minerals originating from conflict regions that benefit armed groups.



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## 5. Quality and Enforcement

- **Quality Standards:** Suppliers must ensure work products meet applicable quality standards and must not misrepresent products. Processes must be in place to minimize the risk of counterfeit materials.
- **Supply Chain Governance:** Suppliers are expected to address the principles of this Code within their own supply chain in line with applicable laws.
- **Consequences of Non-Compliance:** Elchemy reserves the right to review or discontinue business relationships based on adherence to this Code. This may include assessments, document reviews, or **on-site audits**.

## Compliance and Acknowledgment

Suppliers acknowledge the values and principles stated in this Code. Alternatively, they may demonstrate commitment through their own formal corporate policies that embody these values and standards.



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