

SUPPLIER CODE OF CONDUCT

SCOPE OF APPLICATION

The provisions of this Supplier Code of Conduct set forth TRASCO's expectations for all suppliers that the company does business with. TRASCO expects that these principles apply to suppliers and their employees, parent, subsidiary or affiliate entities, and subcontractors.

TRASCO expects suppliers to ensure that this Code of Conduct is communicated to their employees, parent, subsidiary and affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all.

BASIC PRINCIPLES

This Code of Conduct is based on internationally proclaimed human rights, including the International Bill of Human Rights, the eight core conventions of the International Labour Organization² and Article 32 of the UN Convent on the rights of the Child.

BASIC WORKING CONDITIONS A AND HUMAN RIGHTS

We strongly believe that employees are a company's most important resource.

CHILD LABOR

Suppliers shall work to prevent all forms of child labor. Under no circumstances should employment be offered to a person younger than 15 years of age (or 14 where the national law so allows) or younger than the countries legal minimum age, if higher than 15.

TERMS OF EMPLOYMENT

Our suppliers must guarantee that the working conditions for their employees comply with all applicable legal requirements. In addition, each employee should have the right to get written information, in a language that they can easily understand, specifying their terms of employment.

HEALTH AND SAFETY

Safety should always be one of the most important factors in any decision, which is why we expect our suppliers to provide and maintain a safe and healthy working environment that at least meets, but preferably exceeds, applicable standards and legal requirements.

FORCED LABOR

There can be no forced labor of any kind relating to TRASCO, our products and services. Therefore, in no event may our business partner use forced labor, regardless of its form. Forced labor includes debt bondage, trafficking and other forms of modern slavery.

WAGES AND BENEFITS

Our suppliers may not pay their employees' wages and benefits less than is required by applicable law or collective labor agreement, where applicable. Information about wages and benefits must be available to all employees, in accordance with applicable laws.

FREEDOM OF ASSOCIATION

Suppliers shall respect the rights of their employees to lawfully form, join or exclude themselves from employer-employee relationship related associations and collective bargaining, where permissible by local law. We encourage our suppliers to ensure that employees are given the opportunity to discuss their working conditions with management, without fear of reprisal, intimidation or harassment.

NON-DISCRIMINATION AND EQUAL OPPORTUNITIES

Our suppliers may not engage in any form of discrimination based on gender, race, ethnicity, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background and/or other characteristics where protected by applicable law. Suppliers are expected to treat their employees with respect, dignity and common courtesy.

BUSINESS INTEGRITY

We expect our suppliers to conduct their business ethically and with the utmost integrity.

ANTI-CORRUPTION

None of our suppliers, their employees or their subcontractors may ever engage in, or tolerate, any form of bribery or corruption. As our supplier, you may neither offer nor accept any form of improper benefit to/from a third party including TRASCO, whether public or private, with the purpose of obtaining or retaining business or in order to gain preferential treatment. Such improper benefits may include, but not limited to, monetary gifts, monetary loans, pleasure trips or vacations, luxury goods, concealed commissions, facilitation payments or kickbacks. We also expect our suppliers to ensure that all of their reports, records and invoices are accurate and complete, and that they contain no false or misleading information.

CONFLICT OF INTEREST

We expect our suppliers to disclose to us whenever a situation arises in which there appears to be a conflict of interest involving or affecting TRASCO. In a similar vein, we expect any employee or other representative of TRASCO to disclose to us if they have any involvement in, or financial ties with, any of our suppliers.

FAIR COMPETITION

Our suppliers must support fair business and fully comply with all applicable fair trade, advertising, competition and antitrust laws. We expect our suppliers to compete fairly and to never entering into any understanding or agreements that hinder competition.

Accordingly, this means that as a supplier you should not undertake in any way with any competitor to: fix prices, discounts or terms of sale; or divide markets, market shares, customers or territories.

We also expect our suppliers to not competitively exchange confidential or sensitive information, even if it is made via third parties. Sensitive information include things like prices, timing of price changes, magnitude of price changes, costs, profit margins, sales forecasts, sales plans, sales territories, distribution practices, terms offered to particular customers, capacity utilization and intentions, competitive bidding plans or strategy, pricing and marketing strategies, product plans and market trade association meetings.

EXPORT CONTROL

TRASCO is committed to fully comply with applicable export control laws and regulations and we expect our suppliers to do the same.

PROTECTING INFORMATION AND INTELLECTUAL PROPERTY

Suppliers must respect intellectual property rights and protect confidential information by safeguarding it against misuse, theft, fraud or improper disclosure.

ENVIRONMENTAL PROTECTION

Trasco is committed to the principles of environmental sustainability.

TRASCO expects its suppliers to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.



CHEMICAL AND HAZARDOUS MATERIALS

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

WASTEWATER AND SOLID WASTE:

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

AIR EMISSIONS

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

MINIMIZE WASTE, MAXIMIZE RECYCLING

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

NON-ADHERENCE TO THESE PRINCIPLES WILL BE A FACTOR IN CONSIDERING WHETHER WE DO BUSINESS WITH THIS SUPPLIER.

WE ENCOURAGE OUR SUPPLIERS TO IMPROVE THEIR BUSINESS PRACTICES IN ACCORDANCE WITH THE PRINCIPLES SET OUT IN THIS CODE OF CONDUCT.