

# Supplier Code of Conduct

## Introduction

This Supplier Code of Conduct explains what Snell expects from you as a Snell supplier with regards to human rights, business practices, employee relations, health and safety and other topics related to sustainable and responsible business practices. It forms the foundation of Snell's Sustainable Sourcing program and defines what customers, consumers, and other stakeholders can expect from Snell.

Choosing responsible business partners is important to us. We will work together with our suppliers to make improvements with respect to social and ethical performance. As a supplier to Snell, we ask that you are aware of all companies in your production and supply chain and upon request be able to provide us with adequate details of the supply chain for the goods supplied to Snell.

## Ethical Business Practices

### Integrity

Snell suppliers shall conduct their business in a professional and independent manner at all times, and in accordance with standards set forth in all applicable international and national laws and regulations while recognizing that Snell's requirements may sometimes exceed those standards. At minimum, suppliers must act with integrity, honesty, and fairness in all aspects of their business.

### Fair Competition

Suppliers and all persons acting on their behalf shall comply with national and supranational antitrust and competition laws. They shall not enter directly or indirectly into any illegal agreements with their competitors nor exchange sensitive information, e.g., regarding markets, customers, strategies, prices and the like. All suppliers and all persons acting on their behalf shall participate in public tenders and private sector bidding procedures by strictly following the applicable laws and regulations.

### Conflicts of Interest

Suppliers shall inform Snell if any Snell employee has an interest in the supplier's business which might cause a conflict of interest. Suppliers and persons acting on their behalf must avoid conflicts of interest with respect to their private activities, entities in which they, their close relatives or associates have an interest, their business activities with other parties and their part in the business relationship with Snell. Supplier shall inform Snell about existing conflicts of interest as soon as it becomes aware of such conflicts.

### Anti-Corruption & Bribery

Supplier and all persons acting on their behalf shall comply with all applicable anti-corruption laws while conducting business with Snell. Bribery and any other form of corrupt business practice are strictly prohibited. The direct or indirect offer, granting or acceptance of illegitimate benefits to generate, maintain or accelerate business is unacceptable. Suppliers must ensure that no such benefits are exchanged during their business.

Suppliers shall conduct appropriate risk-based due diligence prior to engaging any sub-supplier to ensure that such third parties comply with all applicable anti-corruption laws.

### **Data Protection**

Supplier shall comply with all applicable data protection laws in collecting, processing, storing or otherwise handling personal data of any individuals, including, without limitation, their own employees and employees of their customers, suppliers, and business partners.

### **Duty to Report**

Supplier must report to their Snell representatives any suspicions of a material breach of any of Supplier's obligation under this Supplier Code of Conduct including any breach by Supplier's sub-suppliers.

### **Occupational Health & Safety**

Suppliers must take the necessary steps to ensure a safe and healthy working environment for all their employees. As part of this effort, Supplier must have in place a documented Health and Safety Management System providing for continuous monitoring and improvement of the working environment. Supplier must also have a senior manager within its organization who is directly responsible for Health and Safety. All suppliers are required to provide relevant information to enable Snell to fulfil its obligations regarding occupational health and safety.

### **Fair Labour Practices & Free Association & Collective Bargaining**

Snell expects its suppliers will treat their employees and all persons acting on their behalf with the highest ethical standards. Supplier must adhere to international and national conventions and laws in the area of fundamental rights, including, but not limited to, non-discrimination, freedom of association, the right to collective bargaining, protection of children and mothers and the right to form works' councils. Furthermore, Snell suppliers are not allowed to use or threaten to use corporal punishment or other forms of abuse.

If required by local law, all employees of a Snell supplier must have an employment contract. Suppliers' working hours shall comply with national laws and local industry standards, and wages and other benefits provided by supplier must be fair and at least equal to the minimum relevant legal and industry standards.

### **Child Labour & Forced Labour**

Suppliers shall take measures to ensure they do not engage in or support the use of forced or bonded labour. This includes all forms of human trafficking and working against one's own will or choice. No employee shall be required to lodge deposits or identity papers when commencing employment. If supplier uses a staffing recruiter or agency, in no event shall workers be charged fees or expenses related to their recruitment. The use of child labour by the supplier is strictly prohibited. Child labour refers to work that is mentally, physically, socially, morally dangerous, or harmful for children, or improperly interferes with their schooling needs.

### **Discrimination**

Snell suppliers are expected to adopt and enforce policies which effectively prohibit discrimination or harassment on the grounds of gender, marital or parental status, ethnic or national origin, sexual orientation, religious belief, political affiliation, age, disability, or of membership in a trade union or employee organization.

### **Grievance Mechanisms**

Snell expects its suppliers will have in place effective grievance channels through which employees can report complaints and grievances about their working conditions without fear of retaliation.

### **Respect for the Environment**

Snell supports and encourages suppliers to act in an environmentally responsible manner, and to respect applicable legislation. Snell requests that its suppliers make continuous improvements in environmental protection and to minimize the environmental impact and pollution generated by their activities.

### **Community Relations**

Snell encourages suppliers to be a positive influence within and act with respect for the communities in which they operate.

### **Verification of Compliance Standards**

Snell reserves the right to verify the Suppliers compliance with the Code.

### **Deviation from Supplier Code of Conduct**

If a supplier or any of its own (sub-)suppliers fails to comply with the requirements set forth in this Supplier Code of Conduct, the supplier must take appropriate action to remedy the breach and prevent a recurrence of such breach in the future. Snell reserves the right to terminate the business relationship with any supplier who deviates persistently from or breaches this Supplier Code of Conduct in a material way.

Yours faithfully

A handwritten signature in black ink, appearing to read "Andrew Day".

**Andrew Day**

Group Procurement Manager  
Snell Packaging & Safety Limited