



## WEGO CHEMICAL GROUP

239 Great Neck Road ♦ Great Neck, NY 11021 ♦ USA  
Tel: +1 (516) 487 3510 ♦ Fax: +1 (516) 487 3794  
[www.wegochem.com](http://www.wegochem.com)

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### Supplier Code of Conduct

Wego Chemical Group (Wego) considers reliability, integrity and compliance to be core values. We are committed to conducting our business according to the highest legal, ethical and moral standards. Wego expects its employees to follow the ethical principles stated in the Employee Handbook and to act with good sense whenever engaging with others, whether colleagues or third parties.

We expect our partners to operate their businesses with professionalism and integrity, share our social and environmental values, and acknowledge our quality and safety culture. Therefore, we are appealing to all our suppliers to conduct themselves in compliance with the applicable laws and regulations. These pillars are building the foundation for the success and reputation of the relationship between Wego and its suppliers.

This “Supplier Code of Conduct” sets forth the minimum requirements for all suppliers to conduct business with Wego. It shall form part of all our contractual relationships entered into between Wego and its suppliers.

#### **Compliance with laws, regulations and ethical practices**

- Comply with all applicable national and international trade laws and regulations, including antitrust and trade controls regimes.
- Pro-actively support sustainability performance by complying with applicable laws, international environmental, social and corporate governance standards within their company and supply chain.
- Prohibit any forms of bribery, corruption, extortion or embezzlement of government officials and private parties. All suppliers acting on our behalf or in connection with our business are prohibited from giving or offering anything of value directly or indirectly to any government official or entity in order to improperly obtain any business advantage or affect any government act or decision. This prohibition includes facilitating, expediting or “grease” payments made to government officials, either directly or indirectly, in order to expedite any official service or function.
- Promote and ensure fairness in competition.
- Ensure that, within their company, no conflicts of interest exist in business actions with Wego. The monetary value of any gifts, meals or entertainment needs to be kept reasonable and aligned with company policies.
- Implement and continuously improve an appropriate management system, including sound and transparent data management to ensure state-of-the-art quality management.



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### Human Rights and Labor

- Protect internationally proclaimed human rights.
- Reject and do not use forced labor (including all forms of forced prison labor, indentured labor, slave labor, human trafficking and all other forms of oppression) child labor and seek the same commitment from all upstream partners.
- Ensure sourcing follows responsible minerals sourcing standards, particularly with regard to conflict minerals.
- Treat their employees with respect and provide a workplace free from any harassment, abuse, harsh or inhumane treatment, unlawful practices, and discrimination.
- Comply with the prohibition of unequal treatment in employment, for example on the grounds of disabilities, health status, national and ethnic origin, religion or belief, etc.
- Comply with the prohibition of using or contracting unethical and unlawful security services companies, e.g., if this may lead to inappropriate acts (torture, degrading treatment, etc.).
- Comply with the prohibition of causing an environmental change or excessive water consumption that may have adverse human rights consequences.
- Uphold human rights to freedom of association and collective bargaining.
- Comply with minimum wages and working hours in accordance with applicable laws. Ensure compensation according to local standards and condemn any discrimination in compensation practices.
- Respect the privacy of all their employees and business partners by protecting confidential information, data, and intellectual property from misuse.

### Environmental and Safety

- Protect their employees' and communities' health as well as the health of the general public.
- Comply with applicable laws regarding health and safety.
- Comply with all applicable environmental regulations and minimize emissions and waste.
- Utilize resources efficiently, and use energy-efficient, environmentally friendly technologies.
- Ensure safe, environmentally sound development, sourcing, manufacturing, transport, distribution, use and disposal of products with the goal of protecting and preserving the environment.



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- Protect biodiversity and ensure that renewable raw materials are not competing with food.
- Respect the land rights of individual and local communities.

### Assessments / Audits

In order to ensure our supply chain indeed lives up to these critical ideals, Wego may conduct assessments in various ways, including sustainability questionnaires and/or on-site audits, executed either by Wego employees or by independent assessment/auditing service providers. By supplying services, parts, materials, equipment, or other materials to Wego it is understood and agreed by all suppliers, vendors, and/or contractors that they will participate in and support all such assessment efforts, including providing any documentation and certification requested by Wego to evidence the compliance with any/all of the above.

### Confidential/Proprietary Information

Our suppliers must respect our confidential, proprietary or sensitive information and may not use or disclose any such information except in accordance with their contract with Wego or with prior written consent. Any information or data regarding our company must be treated as confidential at all times unless that information becomes publicly available through no fault of the supplier. Our suppliers may not disclose Wego's confidential or proprietary information to persons outside of their organizations, nor may they disclose such information within their own organizations except on a strict "need to know" or "need to use" basis for the purpose intended by Wego. Suppliers are also prohibited from using this information for their own benefit or the benefit of any other person.



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The principles set out represent, among other things the human rights-related and environmental-related expectations placed on all suppliers, vendors, and contractors with whom we do business. These requirements are mandatory. The requirements apply along the entire supply chain, so our suppliers, vendors, and contractors must, in turn, commit their upstream partners accordingly.

This Code of Conduct is applicable to all vendors, suppliers, and contractors that do business with any Wego Chemical Group company, entity, or affiliate.

This Code of Conduct is a global expectation and requirement of doing business with Wego and, as such, is incorporated into our terms of purchase applicable to all Wego purchase orders.