

POLYVANTIS Supplier Code of Conduct

POLYVANTIS Holding GmbH and its global affiliates and subsidiaries (collectively, "POLYVANTIS") are committed to conducting business in an ethical, legal, safe, and responsible manner. This Supplier Code of Conduct (hereinafter, the "Code") outlines the minimum standards and expectations for all vendors, suppliers, and service providers (collectively, "Suppliers") doing business with POLYVANTIS. Suppliers are also expected to take reasonable steps to ensure that their subcontractors and others within their supply chain meet the minimum standards set forth in this Code.

1. Compliance with Laws

Suppliers must comply with all applicable local, national, and international laws, regulations, and standards. Where applicable laws are less restrictive than this Code or vice versa, Suppliers must adhere to the higher standard.

2. Business Integrity and Ethics

- **Anti-corruption and bribery.** Suppliers must comply with all applicable anti-bribery and corruption laws, including the U.S. Foreign Corrupt Practices Act. Suppliers may not offer, give, or accept bribes, kickbacks, facilitation payments, or anything of value to improperly influence business decisions.
- **Gifts, entertainment & hospitality.** POLYVANTIS discourages the exchange of gifts, entertainment, or hospitality in connection with its business relationships. If such courtesies are offered or received, they must be modest, infrequent, and transparent, and must never be intended to influence or appear to influence a business decision. All exchanges must comply with applicable laws and the policies of both POLYVANTIS and the Supplier.
- **Conflicts of interest.** Suppliers must avoid any situations that could create, or appear to create, a conflict between personal interests and professional responsibilities. Business decisions must be based solely on objective factors such as quality, price, and service. Any potential conflict, including offers of employment or personal benefits to POLYVANTIS employees or their family members, must be promptly disclosed to POLYVANTIS as directed in Section 6 of this Code.
- **Fair competition.** Suppliers must comply with all applicable antitrust and competition laws. Practices such as collusive bidding, price fixing, and market allocation are strictly prohibited.
- **Trade compliance.** Suppliers shall maintain policies and procedures reasonably designed to comply with applicable sanctions, export control, and customs laws. Supplier shall not engage in any activity intended to evade or circumvent applicable sanctions, export control, or customs laws, including by

misclassifying goods or routing transactions through third parties or jurisdictions for such purpose.

- **Accurate & complete records.** Suppliers must maintain accurate, complete, and transparent records of all transactions. Suppliers shall not falsify, conceal, or mischaracterize any information in their books, records, or other documents. Records must accurately describe the nature of each transaction, including the identity of all parties involved and the purpose of any payment or transfer of value.
- **Confidential information & intellectual property.** Suppliers must protect all confidential and proprietary information of POLYVANTIS and use it only for legitimate business purposes. Suppliers must respect all intellectual property rights and shall not use POLYVANTIS's confidential or proprietary information to improperly seek or obtain intellectual property rights.
- **Information security & data protection.** Suppliers must take appropriate measures to maintain the security of all data and information provided by POLYVANTIS. This includes implementing adequate physical, administrative, and cybersecurity measures to prevent unauthorized access to such data. Suppliers must promptly report any unauthorized access or suspected security breaches to POLYVANTIS. If a Supplier's performance involves access to POLYVANTIS data, systems, or networks, such Supplier shall adhere to any applicable POLYVANTIS information security schedule. Any personal data collected or processed on behalf of POLYVANTIS must be handled securely and in compliance with applicable data protection and privacy laws.

3. Labor and Human Rights

- **No forced labor.** POLYVANTIS will not tolerate the use of forced labor in any part of its supply chain. Forced labor includes work that is performed by unpaid, incarcerated, or indentured laborers and work that is required of a person under threat of punishment or for which they have not made themselves voluntarily available, such as debt bondage or human trafficking. Suppliers shall not use or in any other way benefit from forced labor.
- **No child labor.** POLYVANTIS will not tolerate the use of child labor in any part of its supply chain. Child Labor means the employment of any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country of manufacture or performance, whichever is highest. Young workers (those under 18 years of age) may be employed only in non-hazardous work and in compliance with all applicable laws regarding hours, working conditions, and protections for young workers.
- **Non-discrimination & non-harassment.** Suppliers must provide a workplace free from illegal discrimination, harassment, intimidation, or other abusive behavior.

- **Wages & working hours.** Suppliers must comply with all applicable labor, wage, and hour laws, including those governing minimum wages, overtime, and maximum work hours.
- **Freedom of association.** Suppliers must respect the rights of its employees under locally applicable laws to associate freely, join or form labor unions, and to engage in collective bargaining. Suppliers must not retaliate or discriminate against employees who exercise such rights.

4. Health, Safety & Environmental Responsibility

- **Workplace safety.** Suppliers must provide a safe and healthy work environment for all employees. Workplaces should be operated in compliance with applicable health and safety laws and standards, with measures in place to prevent accidents, injuries, and exposure to hazardous conditions.
- **Environmental protection.** Suppliers must conduct their operations responsibly to minimize environmental impact. This includes complying with all applicable environmental laws and regulations, managing waste and emissions properly, and using resources efficiently. Suppliers are encouraged to pursue continuous improvement in sustainability and environmental performance.
- **Product quality & safety.** Suppliers must ensure that all products and services provided to POLYVANTIS meet agreed quality standards and comply with all applicable safety and regulatory requirements. Products must be safe for their intended use, and any known or suspected quality or safety issues must be promptly reported to POLYVANTIS as directed in Section 6 of this Code.
- **Responsible sourcing.** Suppliers must take reasonable steps to ensure that the materials and services they procure are obtained in a manner that is ethical, legal, and otherwise consistent with the principles of this Code.

5. Compliance Monitoring & Verification

Suppliers must establish and maintain appropriate oversight mechanisms to monitor, identify, and address risks, noncompliance, and other ethical concerns within their own operations and throughout their supply chains. Suppliers must also ensure that their employees and subcontractors are adequately trained and knowledgeable regarding applicable ethical and compliance standards. POLYVANTIS reserves the right to assess Supplier compliance with this Code through questionnaires, site visits, and review of Supplier's policies, practices, and relevant records. Suppliers must cooperate fully with any such reviews and provide accurate information upon request.

6. Reporting to POLYVANTIS

- Suppliers must monitor compliance with this Code and promptly disclose potential conflicts of interest and report known or suspected violations of this Code or applicable law to POLYVANTIS. Reports may be made to POLYVANTIS’s compliance organization at compliance@polyvantis.com. Reports may also be made using the POLYVANTIS Whistleblower System at the following link: <https://polyvantis.integrityline.app/?lang=en>
- Suppliers shall also promptly report to POLYVANTIS any events or conditions that could reasonably be expected to interrupt or impair the continuity, quality, or timely delivery of goods or services. This includes, but is not limited to, material operational changes, supply-chain disruptions, labor disputes, safety or environmental incidents, cybersecurity events, natural disasters, regulatory actions, or financial distress. Such reports shall be made directly to POLYVANTIS’s procurement organization at procurement@polyvantis.com.

7. Consequences of Noncompliance

Compliance with the standards and obligations of this Code is fundamental to the business relationship between POLYVANTIS and a Supplier. Failure to comply with this Code may result in corrective action, suspension of business, or implementation of a plan of remediation or other measures before business resumes. POLYVANTIS reserves the right to terminate any contractual relationship with a Supplier where a violation of this Code is assessed as very serious or where corrective measures fail to remedy the noncompliance.

REVISION INDEX

Rev.	Reviewer / Released by	Changes	Date
1.0	Schneider/Ratiu	Adoption of Procurement Code of Conduct for Suppliers for POLYVANTIS GmbH	May 1, 2024
2.0	Boren/Stubbe/Dhawan	Title Change to “POLYVANTIS Supplier Code of Conduct,” expansion of scope to cover all global affiliates of POLYVANTIS Holding GmbH, comprehensive restatement to improve clarity, structure, and alignment with POLYVANTIS standards and values	January 15, 2026