

Sulzer Supplier Code of Business Conduct

As a global company we recognize our responsibilities with regards to sustainable business. As such, we consider ethically, socially, and environmentally responsible practices as a fundamental pillar of our relationships and a key part of our business success. This code of conduct reflects our expectations which we expect all Sulzer suppliers of goods and services to adhere to and pass on to their suppliers in order to operate in a responsible manner.

Sulzer maintains a compliance program requiring all Sulzer Companies to behave ethically and in a compliant manner that adheres to the principles presented in the Sulzer Supply Chain Policy. Suppliers and Service Providers for Sulzer should commit to and ensure that their organizations and their suppliers will also act in line with the ethics and compliance standards applied by Sulzer. Together, we can ensure that the quality standards and sustainable supply chain practices of our global supplier base are in line with our own. Sulzer expects suppliers to respect the 10 Principles of the UN Global Compact and to follow the principles set out below when supplying goods or performing services for a Sulzer company:

- Comply with all applicable laws, rules, statutes, and regulations, including but not limited to all applicable anti-corruption, anti-bribery, antitrust, competition (including unfair competition), modern slavery, tax evasion, money-laundering, and criminal laws.
- Respect internationally proclaimed human rights such as but not limited to not using child labor, forced labor, or any other form of slavery.
- Promote supply chain transparency and integrity especially with regards to “conflict minerals”, this includes not facilitating war crimes or other violations of international humanitarian law, crimes against humanity or genocide and not facilitating the direct or indirect support of public or private security forces that illegally control mine sites and transportation routes.
- Not discriminate in respect of employment and respect the personal dignity, privacy and rights of each individual and prohibit behavior that is coercive, sexual, threatening, abusive or exploitative.
- Act responsibly regarding worker safety and provide fair and favorable working conditions by supporting freedom of association, collective bargaining and fair wages.
- Respect the right to tenure of communities and not allow forms of land grabbing.
- Act responsibly regarding the environment to prevent environmental pollution and manage hazardous substances and waste (according to the Basel Convention), persistent organic pollutants (according to the Stockholm Convention), and respect the European Union’s (EU) REACH directive with regards to hazardous chemicals (including mercury as per the Minamata Convention).

- Take all appropriate and reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks of any personal data which it receives and collects from Sulzer.
- Keep accurate business and financial records of all transactions related to their business with Sulzer and be ready to provide such records upon request.
- Protect and ensure that all information provided by Sulzer is kept confidential and safeguard and process intellectual property in the best interest of Sulzer.
- Act in compliance with the requirements of all applicable export laws, including but not limited to respecting the obligation of obtaining all required authorizations or licenses for the export or re-export of any goods or technology.
- Grant Sulzer access to relevant Supplier documents in case of reasonable suspicion of violation of this Supplier Code of Business Conduct.
- Acknowledge having read and understood the Sulzer Supply Chain Policy (accessible [here](#)) and commit to adhering to its principles.

In the spirit of full transparency, Sulzer offers employees and any other interested parties affected by the operations of our supply chain access to Sulzer's grievance mechanism. All concerns can be submitted anonymously and will be treated in a confidential manner. www.sulzercompliancehotline.com

Additional provisions and policies, including but not limited to provisions related to ethics and compliance, may be updated periodically by Sulzer and published at www.sulzer.com