



Wavin Supplier Code of Conduct

Wavin's supplier Code of Conduct describes the principles and policies that all Wavin supplier when conduct business with Wavin. It is Wavin's policy to conduct business in compliance with law and widely accepted norms of fairness and human decency (see Orbia's Code of Ethics), and we expect our suppliers to act similarly. As a condition of doing business with Wavin, we expect our suppliers to conform to these requirements and expect their sources in the supply chain to do so as well.

We will assess adherence to these requirements and their ongoing performance in meeting these requirements when making sourcing decisions. Wavin suppliers are encouraged to correct non-compliance issues identified during assessments. If a supplier refuses or is unable to correct the non-compliance to our satisfaction, we reserve the right to terminate our relationship. Our requirements for supplier business conduct are:

A. Labor and Human Rights

Human Rights

Wavin suppliers will uphold the human rights of employees and treat them with respect and dignity as understood by the international community. Wavin suppliers are encouraged to develop lawful workplace apprenticeship programs for the educational benefit of their community, provided that all participants meet the minimum age requirements.

Forced Labor

Wavin suppliers are prohibited from using slave or involuntary labor of any kind such as prison labor, indentured labor, bonded labor, or otherwise. This includes the transportation, harboring, recruitment, transfer or receipt of persons by means of threat, force, coercion (such as holding or withholding passports or travel documentation), abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Child Labor

Wavin suppliers will ensure that their hiring practices are in compliance with applicable laws and regulations and meet international best practices and standards. Only workers who meet the applicable minimum legal age requirement in the country where they are working, may be hired by a supplier. Workers under the age of 18 should not perform hazardous work and should be restricted from night work if it interferes with educational needs. Internships that are part of a development program for young people may be an exception to the age requirements, if allowed by local law.

Anti-discrimination

Wavin suppliers shall not subject any person to discrimination with regard to employment (including hiring, salary, benefits, advancement, discipline, termination, or retirement) on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, marital status, maternity, medical condition, or social or ethnic origin. Wavin believes in diversity and inclusion and bringing together people of different races, gender, education, language, viewpoints, and skills sets and experience enables ideas and innovation to flourish and expects its supply chain to uphold these values as well.

Harassment and Abuse

Wavin suppliers shall treat every employee with respect and dignity, and shall not allow any employee to be subject of physical, sexual, psychological, or verbal harassment or abuse.

Wages and Benefits

Wavin suppliers will meet all applicable wages and benefits regulations, at a minimum.. In any event, wages and benefits should be enough to meet basic needs. For each pay period, the supplier will provide workers with an understandable wage statement that includes sufficient information to verify accurate compensation for work performed.



Fair Working Hours

While it is understood that overtime is often required, Wavin suppliers will manage operations in compliance with the law and ensure that overtime does not exceed levels that create inhumane working conditions. Workers will also be compensated meeting overtime wage and hour regulations.

Freedom of Association and Collective Bargaining

Wavin suppliers will recognize the right of workers to join or to refrain from joining associations of their own choosing and the right to collective bargaining, unless otherwise prohibited by law. In all cases, worker rights to open communication, direct engagement, and humane and equitable treatment must be respected.

Subcontractor Compliance

Wavin suppliers agree that any work performed by subcontractors at the supplier's facilities will be treated in the same manner and consistent with the principles set forth in this Supplier Code of Conduct.

Compliance Requirements

- Always maintain recruitment records and immigration documents.
- Always maintain payroll records documenting wages, overtime and hours worked.
- Make sure official documentation that verifies a worker's date of birth, employment history and training history is adequately maintained.

Wavin reserves the right to review this information, as necessary.

B. Health and Safety

Healthy and safe working conditions

Wavin suppliers shall comply with applicable environmental laws and regulations and provide a safe and healthy working environment to prevent accidents and injury to health occurring within or arising out of the course of work, or as a result of the operation of employer facilities.

Compliance Requirements

- Know and comply with applicable health and safety regulations.
- Provide all required training for employees, contractors and others and ensure the effectiveness of such training in a timely manner.
- Set appropriate safety procedures to avoid injuries and any unsafe working conditions.
- Provide the necessary personal protective equipment to the supplier's workforce.
- Track and report occupational injuries and illnesses.

Wavin reserves the right to review this information, as necessary.

C. Environment

Environmental sustainability

Wavin suppliers shall comply with all applicable health, safety and environmental laws and regulations when conducting business. By way of example, suppliers shall:

- Obtain and keep all current required environmental permits and registrations.
- Reduce, control and/or eliminate wastewater, waste and pollution at the source.
- Reduce, control, and/or eliminate air emissions of volatile chemicals, corrosives, and combustion products.
- Ensure that their products comply with the applicable labelling requirements.
- Identify, manage, store, move and handle hazardous substances in accordance with all applicable laws.

Compliance Requirements

- Keep all records related to the environmental laws and regulations that you are required to retain to comply with local law in the countries you operate.



D. Ethics

Anti-corruption

Suppliers will conduct their businesses without engaging in corrupt practices, including public or private bribery or kickbacks. Suppliers will maintain integrity, transparency and accuracy in corporate record keeping. In the event that a Wavin employee solicits or requests a kickback, personal favor (loans, jobs for family members etc.), suppliers will contact a company representative to report the request, even if they declined to offer or pay a kickback.

Gifts, Entertainment and Offers of Hospitality

Wavin strongly discourages suppliers from providing any gift or offer of hospitality to Wavin employees or contractors. No business courtesies are required and should not be given, as you will put Wavin employees in the uncomfortable position of having to decline a supplier's gift or hospitality. Wavin employees are prohibited from receiving cash or cash equivalents (i.e. gift cards of any amount) from a supplier and places strict limits on the receipt of promotional items, personal gifts and entertainment. Any gift or business courtesy that creates or might create a conflict of interest or appearance of impropriety are prohibited.

No unfair business practices

Wavin suppliers will act with integrity and lawfully in the proper handling of competitive data, proprietary information and other intellectual property, and comply with legal requirements regarding fair competition, antitrust, and accurate and truthful marketing.

Avoiding Conflicts of Interests

Wavin suppliers must do business in a way that is open, transparent and with the highest integrity. Suppliers are required to disclose any type of situation that might create a conflict of interest and harm the business relationship. Some common examples of conflicts of interest are situations where a supplier's employee is related to a member of Wavin's workforce. It can include a Wavin employee (or a family member) having a financial interest in a Wavin supplier. Likewise, lavish business courtesies are also channels to create conflicts of interests and must be avoided.

Compliance Requirements

- Promptly notify Wavin if you become aware of any improper business courtesy provided to one of our employees and vice versa.
- Promptly notify Wavin if you become aware of any relationship that could appear to be a potential conflict of interest.
- Promptly notify Wavin of any illegal boycotts or any other type of coercive behaviour that might harm the business relationship.

E. Personal Data, Confidential Information, and Security Measures

Privacy and Information Security

Wavin suppliers must comply with applicable laws, rules, and regulations of the jurisdictions in which they operate regarding privacy and information security. In addition, they must: (i) use information obtained through their relationship with Wavin only for the purpose defined to them; (ii) store information as agreed with Wavin and ensure that they have and continue to have in place appropriate information security policies and procedures to secure access to Wavin information, and (iii) notify Wavin promptly of actual or suspected privacy breaches, security breaches, or losses of Wavin information.

Compliance Requirements

- Do not print or download confidential Wavin documents without permission from Wavin contract manager or the appropriate document owner.
- No Wavin confidential information should be stored in USB drivers, nor should be transmitted using unsecure measures.
- In order to protect Wavin's confidential information, use the watermarks "restricted confidential", "confidential", "Internal Use Only" or, if applicable, "Public Information".
- In the event that you are handling Wavin's private employee, supplier, or customer data, you will ensure that you have information security safeguards in place to protect that information the extent of applicable data privacy laws.
- In the event of a suspected or actual data privacy breach, you will notify Wavin immediately.

F. Management Systems

Management system

Wavin suppliers shall adopt or should have a management system designed to ensure:

- a) Compliance with applicable laws, regulations and customer requirements related to supplier's operations and products;
- b) Conformance with this Supplier Code of Conduct; and
- c) Identification and mitigation of operational risks related to the areas covered by this code.

The management system should also drive continual improvement.

G. Monitoring and Compliance

To ensure compliance with our Supplier Code of Conduct, Wavin shall have the right to monitor suppliers through audits by third parties and visits by Wavin personnel. We seek relationships with suppliers that are committed to manufacturing Wavin's products under fair and safe labor conditions and sound environmental practices. If we determine that a particular supplier does not comply with this Code, we typically strive to work with the supplier to develop and implement an appropriate corrective action plan. Nevertheless, depending upon the nature of the non-compliance, Wavin reserves the right to end its relationship with a supplier that produces and/or delivers Wavin's products at any time for failing to adhere to our Supplier Code of Conduct.

H. Reporting Concerns

If you become aware of a situation that may involve a violation of this Supplier Code, you have a responsibility to report it to Wavin. Wavin will treat all reports confidentially to the extent possible, consistent with the applicable law and Wavin's policies. A thorough investigation might be needed, and suppliers will be expected to assist Wavin in these reviews by sharing information or providing access to relevant data. All reports will be investigated promptly and thoroughly.

You can make a report by reaching out to your Wavin point of contact, another Wavin employee in a position of authority, or by accessing to Wavin's Ethics Helpline at www.ethics.orbia.com. It is available 24/7 in all countries where Orbia operates.

Company name: _____

Signed by: _____

Date: _____

Signature: _____