

# Third-Party Code of Conduct



## 01. Introduction and purpose

At Ence, our commitment to ethics and integrity in conducting business is a core principle set out in our Code of Conduct and Sustainability Policies.

We extend this commitment to our supply chain to reduce risks and promote sustainable practices and shared values across the value chain. Our aim is to build commercial relationships based on trust and long-term collaborations with our suppliers and business partners, while promoting responsible practices that generate long-term value for Ence and its stakeholders.

This Supplier Code of Conduct sets out the principles and minimum requirements that all suppliers and business partners must meet. It is inspired by the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Conventions, the Ten Principles of the UN Global Compact, and international sustainability best practices.

Its aim is to ensure an ethical, responsible and sustainable supply chain aligned with corporate values and international best practices.

## 02. Scope

This Code of Conduct applies to all entities that maintain commercial relationships with Ence, including suppliers of goods and services, contractors, subcontractors, consultants, and other business partners.

All companies and business units of the Ence Group, including majority-owned subsidiaries, must apply this Code to their suppliers and business partners, regardless of the jurisdiction in which they operate or the applicable legislation. Ence will also encourage its suppliers to apply these principles throughout their own supply chain.



## 03. Commitments

### a. Legal and regulatory compliance

Ence suppliers must comply with all applicable laws, standards, and regulations in the countries and regions where they operate, including labour, tax, environmental, competition, occupational health and safety, and data protection laws. They are expected to implement internal controls and training programmes to ensure ongoing compliance.

### b. Human rights and working conditions

Ence suppliers must respect internationally recognised human rights, such as the ILO conventions. Child labour, forced or involuntary labour, human trafficking and any form of harassment or discrimination are strictly prohibited. Suppliers must guarantee freedom of association, collective bargaining and safe, healthy and decent working conditions, with salaries and working hours in accordance with applicable laws.

### c. Business ethics and anti-corruption

Ence suppliers must act with integrity, honesty and transparency, complying with the applicable standards, such as the FCPA and the UK Bribery Act. Any form of corruption, bribery, extortion or fraudulent practices is prohibited. Ence suppliers must avoid conflicts of interest and disclose any situation that could compromise objectivity in their dealings with Ence. They are expected to have internal anti-corruption policies and training programmes aligned with international regulations.

#### d. Protection of the Environment

Ence suppliers must operate in an environmentally responsible way by minimising their environmental impact, reducing their carbon footprint, managing waste appropriately, lowering emissions and promoting efficient use of energy and natural resources. They are expected to implement environmental management systems in their operations and promote sustainable practices across their supply chain.

#### e. Diversity, inclusion and non-discrimination

Ence suppliers must promote an inclusive and diverse working environment free from discrimination based on gender, race, religion, sexual orientation, disability, age or any other personal characteristic.

#### f. Privacy and protection of data

Ence suppliers must protect all confidential information and personal data to which they have access and comply with applicable data protection laws, including the General Data Protection Regulation (GDPR) where relevant.

They must also establish protocols to ensure timely notification of incidents or security breaches.

#### g. Due diligence and traceability

Ence suppliers must implement due diligence processes to identify, prevent and mitigate risks related to human rights, the environment, ethics, and legal compliance in their operations and supply chain. They must ensure traceability of materials and services, particularly those classified as high-risk under applicable regulations (e.g. EUDR regulation).

#### h. Reporting mechanisms and whistleblower protection

Ence suppliers must provide secure and confidential channels for employees and third parties to report irregularities, non-compliance or behaviour contrary to this Code. Suppliers must guarantee protection against retaliation for those reporting in good faith. Where a supplier identifies conduct contrary to this Code, it must inform Ence so the corresponding measures can be taken (<https://ence.integrityline.com/>)

Access here



## 04. Monitoring, evaluation and consequences of non-compliance

Ence reserves the right to audit suppliers to verify compliance with this Code. Non-compliance may result in corrective measures, suspension or termination of the commercial relationship. Suppliers are expected to actively collaborate in audits, evaluations and continuous improvement processes.



## 05. Acceptance and commitment

Suppliers must formally accept this Code as part of the process of formalising the commercial relationship with Ence. Compliance with the Code is mandatory throughout the commercial relationship. The Code may be updated periodically, and suppliers will be informed of any changes.







**Ethics is the  
lighthouse that guides  
our decisions**