

# Business Partner Code of Conduct



AkzoNobel conducts its business based on its core values of Safety, Integrity and Sustainability. We expect our business partners to do the same. This Code explains these core values and specifies what AkzoNobel expects. It shows what we stand for.

## Compliance

Our business partners are expected to comply with all laws and regulations applicable to the business they conduct for AkzoNobel. They are expected to apply the values laid down in this Code or apply equivalent values. If any part of this Code is unclear, they should ask their AkzoNobel contact for explanation. Non-compliance with this Code may lead to measures, including termination of the business relationship.

We confirm to comply with the core values provided in this Code.

Name \_\_\_\_\_

Company name \_\_\_\_\_

Date \_\_\_\_\_

Signature \_\_\_\_\_

## Safety

### People safety

The workplace our business partners provide must be safe. Employees and contractors must be made aware of safety rules and instructed to apply them at all times, while at work, visiting customers or travelling. There is a process in place to manage safety incidents.

### Process safety

It is important that our business partners systematically assess and control the operational risks of hazards, injuries, waste or harm resulting from their activities for us, such as research, manufacture and transport. Their employees and contractors must follow safety procedures, and safety risks and incidents must be reported and controlled promptly.

### Product safety

Our business partners must comply with product safety regulations, label products properly and communicate product-handling requirements. People exposed to products manufactured for and supplied to AkzoNobel must be protected from exposure to hazardous substances. Products supplied to AkzoNobel, and the raw materials used to manufacture these products, meet all applicable product regulatory requirements.

# Integrity

## Honest business conduct

We expect that all of our business partners conduct business fairly and with integrity. They will not offer, promise, give, accept or solicit money, gifts or other advantages as an inducement to do something that is illegal and inappropriate. This includes making facilitation payments. Facilitation payments are payments made to induce officials to perform routine functions they are otherwise obliged to perform.

Entering into a business transaction with or on behalf of AkzoNobel or accepting certain terms and conditions may not be influenced by gifts or hospitality.

Our business partners do not offer AkzoNobel employees gifts or hospitality of more than modest value. They never offer cash or cash equivalents such as gift cards to our employees, or in any circumstance while acting on behalf of AkzoNobel, unless it is in line with AkzoNobel's Customer Incentives Program Rules and Procedures.

## Fair competition

Our business partners compete fairly and comply with competition and anti-trust laws. They do not enter into agreements or practices that have a restrictive effect on competition, such as price-fixing, market allocation or abuse of dominant position. They do not offer products or services to or on behalf of AkzoNobel in a misleading way.

## Trade controls

It is essential that our business partners comply with export control regulations applicable to their business and AkzoNobel, and that they provide accurate and truthful information about it to AkzoNobel, customs and other authorities when required. They identify and manage trade restrictions applicable to their business with us, including those of sanctioned countries and parties.

## Intellectual property and confidential information

We expect our business partners to respect intellectual property rights, including those of AkzoNobel. There must be appropriate measures to prevent disclosure or unauthorized use of AkzoNobel confidential information made available to them.

## Personal data

Our business partners protect the personal data of AkzoNobel's employees and use this data for legitimate and authorized business purposes only. They must be clear on when and how they collect, use or share personal data. They take appropriate security measures to protect the data.

## Conflict of Interest

Decisions our business partners' employees take in regard to AkzoNobel business transactions may not be influenced by personal or private interests. Personal or friendly relationships with an AkzoNobel employee may not be used to influence the employee's business judgment. If an employee is related to an AkzoNobel employee, and this may represent a potential conflict of interest in a transaction or business relationship, our business partners must disclose this fact to AkzoNobel or ensure that the AkzoNobel employee does. Our business partners do not provide financial or other support to political parties to influence transactions with or for AkzoNobel.

## Trading in shares

Our business partners may not trade in securities, or encourage others to do so, using confidential information received from AkzoNobel.

## Company resources

If they use or have access to AkzoNobel's resources, including people, systems, networks and facilities, our business partners must use these resources appropriately, in accordance with AkzoNobel's instructions and for their intended business purpose only.

## Record keeping

We expect our business partners to keep accurate, complete and up-to-date records on their transactions with AkzoNobel. These records must be retained in accordance with applicable laws.

## Preventing fraud

Our business partners must have internal controls designed to detect, prevent and respond to fraud and money laundering. Transactions must be properly recorded and subject to review. Any potential fraud that may have an impact on AkzoNobel must be reported immediately using our SpeakUp! process. More information can be found here: [EthicsPoint - AkzoNobel](#).

## Proper communication

Factual and timely communication with us is essential to a strong relationship. Our business partners will not disclose our confidential information without permission. They consider business communications carefully and ensure that they meet high standards. They will not issue press releases about us, our products or our business relationship without our approval.

# Sustainability

## Human rights

Our business partners recognize the human rights of all people as outlined in the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights. They take responsibility for avoiding infringement of human rights and for remediating the impact, if any, on human rights resulting from activities performed for us and from products made for us.

## Employment relationships

The business partner's employees hired and retained should be suitable for the job. Our business partners are committed to apply principles of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. People are not employed against their will, transported for exploitation, engaged in slavery or servitude, nor deprived of their rights. Legal minimum age requirements as outlined in the relevant ILO conventions and the laws of the countries of operation are adhered to and children under the age of 16 are not employed.

The people our business partners deal with are treated with dignity and respect. Our business partners do not harass or discriminate, whether through culture, nationality, race, religion, gender, political preference, disability, association, sexual orientation or age.

Working hours and remuneration must comply with laws while being fair and just. Overtime is compensated and leave is offered as required. Individual rights to freedom of opinion and association, including the right to collective bargaining, are respected.

## Environment and community

Our business partners comply with all relevant environmental laws and ensure that the necessary permits are in place. They are committed to the efficient use of raw materials, energy and other natural resources while minimizing waste, emission and noise. They care about the communities they operate in, and listen to their concerns.

## Grievance

Our partners provide their employees and other interested parties with a mechanism to raise concerns about violation or potential violation of laws and the values provided in this Code. These concerns will be addressed in a fair and transparent way. Our business partners protect confidentiality and prohibit retaliation against those raising the concern.

## Subcontractor compliance

Any party our business partners engage on behalf of AkzoNobel or to perform work for the benefit of AkzoNobel will be made aware of the values in this Code and will be held to act in accordance with them.