

Code of conduct
for contractors of VESTOLIT



Mutual responsibility - mutual success

GENERATION
RESPECT! Give it to get it.

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Introduction

VESTOLIT is committed to the sustainable use of resources and the sustainable organization of its business processes. Our corporate mission statement is characterized by responsible and fair behavior towards employees¹, customers, suppliers and the general public. It is based on mutual trust and respect.

We promote our employees and commit ourselves to the promotion of human rights as far as this is possible. It is our self-understanding to avoid discrimination, protect people and the environment and to combat corruption. Furthermore, VESTOLIT does not tolerate any conduct that violates the OECD's Guidelines for Multicultural Enterprises (OECD²). These guidelines are recommendations by the governments of the OECD member states and other countries to multinational companies for responsible entrepreneurial behavior.

VESTOLIT expects its contractors to share these principles and assume their responsibilities with their employees, their business partners, society and the environment.

VESTOLIT supports VinylPlus³, an initiative by the European PVC industry, wherein companies voluntarily undertake to support more sustainable production and use PVC plastic.

Furthermore, VESTOLIT expects its contractors to comply with the generally accepted minimum standards as developed and defined in the United Nations Global Office, the OECD Guidelines and the Standards of the International Labor Organization (ILO).

When selecting and evaluating contractors, VESTOLIT will pay attention to adherence to these principles, and will check compliance and their implementation in products and services. If contractors do not meet these criteria, VESTOLIT expects its suppliers to implement a development plan to remedy the identified grievances within a systematic management process. This is required for the activation or continuation of the business relations.

VESTOLIT provides its contractors with this code of conduct with the aim of ensuring compliance with the standards laid down therein and thereby fulfilling the requirements of responsible entrepreneurial activity. Sustainability can be promoted and strengthened only through close and trusting cooperation.



Dr. Dieter Polte

Managing Director, VESTOLIT GmbH
President, Business Unit Specialty Resins

¹ For ease of comprehension, the male form has been used in this text.

All statements refer to both men and women, however.

² www.oecd.org

³ www.vinylplus.eu

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THIS CODE OF CONDUCT IS CONSISTENT WITH THE CONTENT OF THE
“CODE OF ETHICS” OF OUR PARENT COMPANY MEXICHEM.



1. Conduct in the business environment

Compliance with regulations

It is expected that contractors abide by the applicable legal provisions, as well as their own internal guidelines and own commitments.

Combating corruption

Any active or passive bribery, as well as attempts to commit this are prohibited.

It is expected of contractors that they will not offer or guarantee VESTOLIT employees any gifts. It is in principle necessary to maintain distance from employees with regards to other benefits and in particular invitations. These may not be inappropriate and must never be aimed at influencing the decision of a VESTOLIT employee in his business relationship with the contractor or a third party.

Antitrust law

It is expected that contractors shall act in accordance with the applicable antitrust law in each case.

Confidentiality and data protection

It is expected that contractors shall use and protect confidential information and data in a diligent and appropriate manner, and only for the purposes of carrying out the commission in question. Data and information may only be passed on to the extent necessary for these activities. In case of doubt, a consultation should be carried out. The contractor is obliged to abide by all relevant legal data protection provisions in their applicable wording, and will observe these. The contractor shall inform all employees, who come into contact with this information in accordance with the legal provisions, of the relevant data protection provisions and shall commit these employees to observe confidentiality. The declarations are to be presented to VESTOLIT or a third party charged with the protection of VESTOLIT's data, upon request.

Certified: our social responsibility.

The international certificate IQNet SR10 certifies that VESTOLIT is a socially responsible company that meets its obligations towards all its stakeholders.

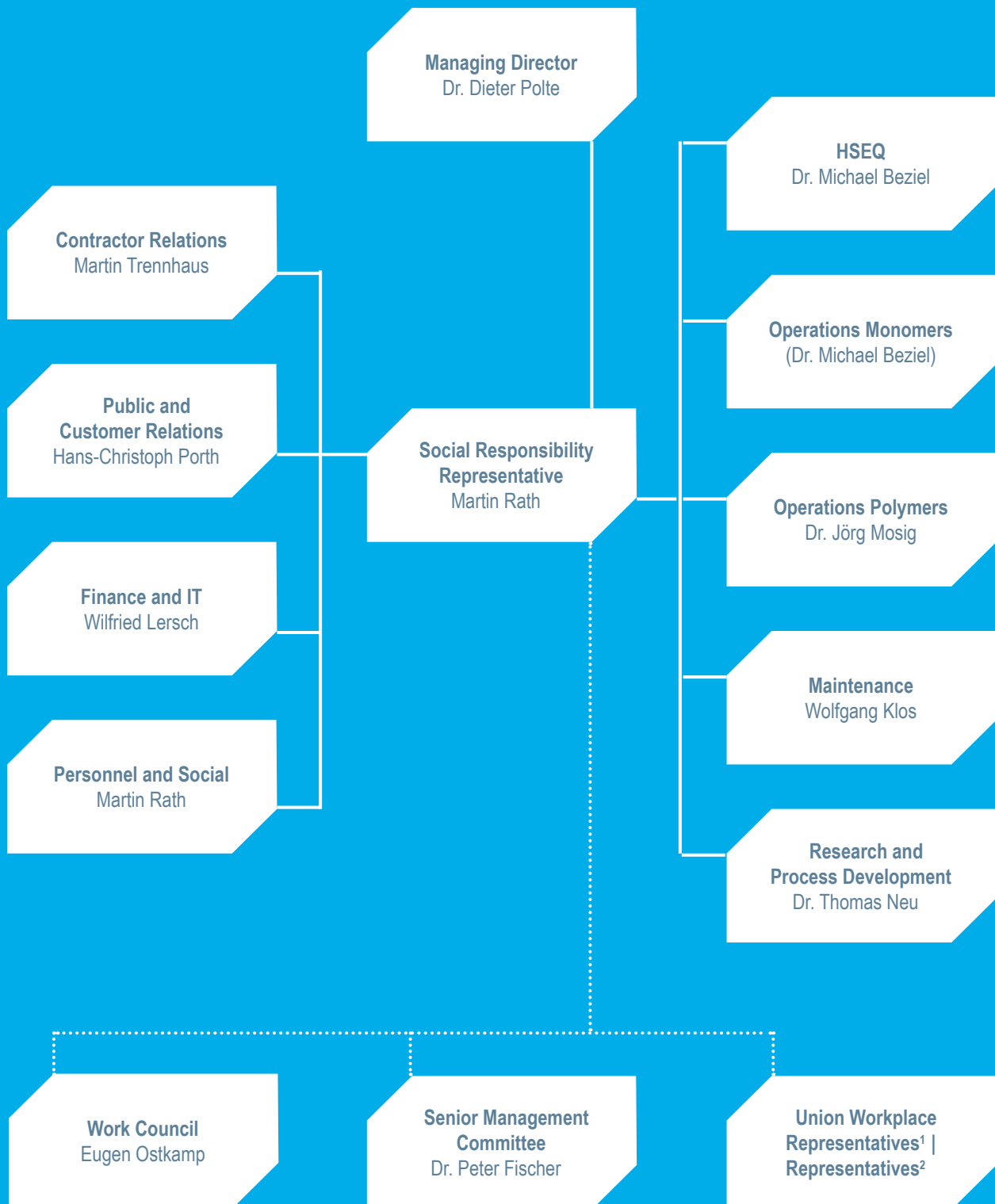
This means that we have a sustainable management system and act in a socially responsible way with respect to social, ecological and economic factors.

The slogan "RESPECT. Give it to get it." expresses our attitude towards social responsibility – because respect is precisely what we show towards our stakeholders.

The IQNet SR10 certificate stipulates the following basic principles, which we work together to uphold:

- Honesty and upstanding behaviour
- Transparency
- Ethical conduct
- Respect for our stakeholders
- Respect for the law
- Respect for international rules of conduct
- Respect for human rights

VESTOLIT's social responsibility organization



— organisational, information

..... information

¹ union workplace representatives, environment union workplace representatives, security supervisor, energy supervisor

² representative pursuant to IMS Handbook (Chapter 2)

2. Conduct and behavior with each other

Freedom of employment

Any use of forced or compulsory labor shall be rejected.

Child protection

Contractors shall ensure that no form of child labor is employed. When defining child labor, the United Nations resolutions or the locally applicable legal provisions and stipulations shall apply, depending on which is stricter.

Equal opportunity and diversity

It is expected that equal opportunity and equal treatment are key components of the contractor's company policy. All persons, regardless of culture, gender, nationality or provenance are to be treated with respect.

Non-discrimination

No employee may be discriminated against on the basis of ethnic background, skin color, gender, age, disability, social class or political stance, provided this is based on democratic principles and tolerance towards others.

Employee relations

We expect that contractors treat their employees with dignity and respect. Contractors shall ensure that their employees can work in an environment free of physical, sexual, psychological or verbal assault.

Right of association

It is expected that contractors accept the basic rights of workers to form trade unions and employee representation schemes, and to join such or consider joining such, and to take part in collective bargaining. In those situations where the right of association and right to collective bargaining is legally restricted, the contractor may offer appropriate alternatives with the cooperation of the staff. Employee representatives shall not be discriminated against and they shall be guaranteed access to work areas.

Wages and social benefits

It is expected that contractors offer remuneration and render services which correspond at least to the national legal minimum norms or the minimum norms of the national economic sector in question, with regards to an appropriate standard of living.

Working hours

It is expected that the contractors abide by the applicable regulations in each case regarding working hours.

Education and qualifications

The building up and expanding the occupational skills of employees is to be promoted at all levels by means of suitable education and further training measures.

3. Environment, health, safety and quality

Quality standards

Quality affects the future. It is therefore expected that the contractors shall abide by the applicable provisions regarding quality, health and safety, and environmental protection. Necessary approvals, licenses and registrations must be present and maintained. Operational obligations and obligations to inform shall be fulfilled.

Product safety

All relevant country-specific regulatory laws and legal stipulations shall be adhered to. Corresponding information (e.g. product information, safety data sheet, notification or registration confirmations, applications and exposition scenarios) shall be delivered to VESTOLIT upon request. Information prepared by VESTOLIT shall be added to the corresponding documents. The contractor shall undertake to provide VESTOLIT in good time prior to the delivery/service with all necessary product information, in particular regarding composition and durability, e.g. safety data sheets, processing instructions, labeling provisions, installation instructions, work safety measures etc., including possible changes to these.

Supply chain

We expect our contractors to observe safe and environmentally-friendly development and manufacture of their products, and of their packaging, transport and disposal.

Health and safety at the work place

It is expected of contractors that they offer their employees a safe working environment and active health protection. Necessary measures shall be taken to avoid accidents and dangers to health which arise as a result of, in connection with, or during the course of work. We expect service providers and contractors working at our facilities under our orders to take an active part in our safety programs.

Animal welfare

As far as is applicable to the contractor, we expect him to reduce animal testing to the lowest possible level. As far as possible, alternatives should be used which are scientifically approved and accepted by the authorities.

Responsible behavior

The protection of people and the environment is a key component of company policy. It is expected that contractors consciously select resources (e.g. water, energy sources, raw materials) and use these in an economical fashion. When selecting and evaluating contractors, we will take into account the environmental and safety aspects of the contractors. The success of our cooperation depends entirely on trust in connection with transparency, reliability and fairness.



4. Implementing standards and requirements

Knowing the requirements and expectations of our suppliers is very important to us. We therefore expect open and honest communication. This is the only way to act accordingly and strengthen the partnership.

Contractors can demonstrate their implementation of and adherence to these principles by means of their own code of conduct or own company policy which incorporates these standards. Should no corresponding standards be established, it shall be expected that the contractor will undertake to observe this code of conduct.

VESTOLIT does, however, reserve the right to assess the implementation of and adherence to these standards. The following measures may be used for this assessment:

- Voluntary disclosure
- Assessment by a third party
- Certificates / statements
- Topic-specific audits on site

It is expected of contractors that they shall maintain a quality assurance system, e.g. pursuant to ISO 9001 and/or ISO 14001. Risk-oriented principles and measures shall be established for the fulfilling of these standards. The implementation of these shall be monitored in an appropriate manner. Any breaches identified shall be resolved immediately and methods of improvement that can be inferred from this shall be comprehensively assessed.

5. The VESTOLIT employee code of conduct at a glance:



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- 1 All employees are obliged to act only in the interests of VESTOLIT when dealing with customers, contractors and other business partners.
- 2 Conflicts of interest caused by auxiliary activities, financial participation in competitor companies, customers and contractors, or the issuing of work orders and other transactions to/with family members must be approved.
- 3 During their business activities, all employees shall respect the rights, and country-specific and cultural differences of any and all individuals with whom they come into contact.
- 4 All business matters and processes must be carried out in such a way that they correspond to all applicable laws, voluntarily accepted obligations, and other binding provisions.
- 5 Contractors and service providers and selected as part of an orderly process according to objective and comprehensive criteria.
- 6 Service-related provisions, discounts, price reductions or free-of-charge goods deliveries shall be paid to the contracted partner in question in non cash form. The agreements shall be comprehensively and appropriately documented.
- 7 All information which has not been made publicly available is subject to confidentiality.
- 8 All employees shall act in accordance with applicable competition law in each case. National, multinational and supranational foreign trade regulations shall be observed, as shall tax regulations both at home and abroad.
- 9 The adherence to provisions on environmental protection and health and safety, with regards to security and quality is non-negotiable.
- 10 Any breaches of the code of conduct known about shall be registered immediately to the supervisor, the work council or senior management committee representative of the executive team or directly to the HR director.

Contact

For questions and/or comments on social responsibility,
please contact:

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