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Supplier Code of Conduct

1. Purpose

This Code of Conduct defines the principles governing supplier relationships with ELVE S.A. (the “Company”). Its objective is to ensure responsible, ethical and sustainable business practices across the supply chain.

The requirements are based on internationally recognized standards, including:

- UN Guiding Principles on Business and Human Rights (UNGPs)
- ILO Core Labour Standards
- OECD Due Diligence Guidance for Responsible Business Conduct

2. Scope

This Code applies to all suppliers, subcontractors and business partners, regardless of location or size.

Compliance with this Code is a mandatory condition of cooperation. Suppliers shall ensure that equivalent requirements are implemented throughout their supply chains.

3. Legal Compliance

Suppliers shall comply with all applicable laws and regulations as well as internationally recognized standards. Where requirements differ, the higher standard shall apply.

Suppliers are expected to monitor regulatory developments and adapt their practices accordingly.

4. Human Rights and Labour Standards

Suppliers shall respect and uphold internationally recognized human rights.

- Child labour is strictly prohibited
- Forced, bonded or involuntary labour is prohibited
- Employment must be freely chosen



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5. Non-Discrimination and Fair Treatment

Suppliers shall ensure equal opportunity and prohibit discrimination based on gender, age, ethnicity, religion, disability, sexual orientation or other protected characteristics. Harassment, abuse or inhumane treatment are not tolerated.

6. Freedom of Association

Suppliers shall respect workers' rights to freedom of association and collective bargaining. Where these rights are restricted by law, suppliers shall provide alternative means for worker representation and dialogue.

7. Working Hours

Working hours shall comply with applicable laws and industry standards.

- Overtime must be voluntary
- Overtime must be compensated appropriately
- Working hours must not exceed legal limits

8. Wages and Benefits

Wages shall be paid regularly, on time and in compliance with legal requirements.

- Unauthorized wage deductions are prohibited
- Suppliers are encouraged to work toward living wages

9. Health and Safety

Suppliers shall provide a safe and healthy working environment.

- Risk assessments and preventive measures must be implemented
- Workers must receive adequate training
- Continuous improvement of health and safety standards is required



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10. Environmental Responsibility

Suppliers shall operate in an environmentally responsible manner and comply with applicable environmental laws.

They shall:

- reduce emissions and resource consumption
- manage waste and wastewater responsibly
- handle chemicals safely

11. Subcontracting and Supply Chain Transparency

Subcontracting requires prior written approval by the Company.

Suppliers shall ensure:

- full transparency of their supply chain
- compliance of subcontractors with this Code

12. Grievance Mechanisms

Suppliers shall establish accessible and effective grievance mechanisms.

Reports must be:

- handled confidentially
- investigated objectively
- free from retaliation

13. Monitoring and Audits

Suppliers shall cooperate with audits, inspections and assessments conducted by the Company or third parties.

They shall provide:

- access to facilities and documentation
- access to workers for confidential interviews

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14. Corrective Actions

Suppliers shall implement corrective actions within agreed timelines. Progress shall be monitored and documented. Continuous improvement is expected.

15. Documentation and Record Keeping

Suppliers shall maintain accurate and reliable documentation demonstrating compliance. Records must be available upon request.

16. Anti-Corruption and Business Ethics

Suppliers shall maintain a zero-tolerance approach to corruption.

- Bribery, facilitation payments and fraud are prohibited
- Business practices must be transparent and ethical

17. Fair Competition

Suppliers shall comply with applicable competition laws. Cartel behavior, price fixing or other anti-competitive practices are strictly prohibited.

18. Data Protection and Confidentiality

Suppliers shall protect personal and business data.

Data must be:

- processed lawfully
- protected against unauthorized access
- handled confidentially



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19. Environmental and Climate Commitments

Suppliers shall contribute to climate protection and sustainability.

They are encouraged to:

- reduce greenhouse gas emissions
- promote circular economy practices
- improve resource efficiency

20. Training and Awareness

Suppliers shall ensure that employees are informed about this Code.

Appropriate training and awareness measures must be implemented and documented.

21. Whistleblowing

Suppliers shall provide secure and accessible whistleblowing channels.

Whistleblowers must be protected against retaliation. Reports must be investigated objectively and promptly.