

## SUPPLIER CODE OF CONDUCT

### 1. Introduction

**1.1** Nexa Trade's vision is to create responsible choices every day. In addition to providing responsible solutions to customers, our vision means that Nexa Trade always carries out its business with integrity and in line with ethical standards expressed in our Code of Conduct. Responsible sourcing plays a significant role in achieving the vision. Our commitments to responsible and ethical business depends not only on our own people but also upon forming relationships with business partners who share our commitments.

**1.2** This Supplier Code of Conduct ("Code") outlines requirements for Nexa Trade's suppliers ("Supplier") to comply with in their business transactions with Nexa Trade and in business interactions with their own employees, suppliers and other stakeholders. Further guidance on how to interpret and implement the Code is provided in the Guide for Nexa Trade Suppliers.

**1.3** In this Code, "Supplier" means any individual or legal entity which provides Nexa Trade with products, components, materials or services. The definition of "Supplier" also includes Supplier's own 1st tier suppliers, contractors and other business partners participating in the delivery of products, components, materials or services to Nexa Trade.

**1.4** The Supplier shall ensure that its own 1st tier suppliers, contractors and other business partners participating in the delivery of products, components, materials and services to Nexa Trade comply with the minimum requirements set out in this Code, and that this Code is communicated by the Supplier to them.

**1.5** This Code can be amended from time to time. The most recent version of the Code is available on Nexa Trade's website at <https://www.nexa.trade>

### 2. Compliance with laws and regulations

The Supplier shall comply with all laws and regulations applicable to its operations. Should a requirement of this Code contradict national laws or regulations the Supplier shall comply with whichever is more stringent.

### 3. Business Conduct

#### 3.1 Zero tolerance for corruption

Nexa Trade expects its Suppliers to have zero tolerance towards bribery and corruption. Nexa Trade requires that the Supplier shall have standards and procedures in place to ensure that its directors, employees and third parties acting on its behalf do not offer, promise, give or accept any bribes, or make or accept improper payments (such as facilitation payments or kickbacks) to obtain new business, retain existing business, or secure any other improper advantage.

The Supplier shall not provide Nexa Trade employees with any gifts or hospitality in any situation in which said gifts or hospitality might influence, or appear to influence, employee's decision in relation to the Supplier.

#### 3.2 Competing fairly

The Supplier shall compete in a fair manner in compliance with all applicable antitrust laws and regulations, and shall have standards and procedures in place to ensure that its directors and employees do not engage in any anti-competitive practices.

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### **3.3 Compliance with anti-money laundering and privacy rules and trade sanctions**

The Supplier shall comply with all applicable laws and regulations on anti- money laundering and privacy and on all applicable economic and trade sanctions.

### **3.4 Avoiding conflicts of interests**

The Supplier shall avoid any situations where a conflict of interest between the Supplier and Nexa Trade exists including interactions with a Nexa Trade employee that could create a conflict of interest with Nexa Trade employee's duty to act in the best interest of Nexa Trade. The Supplier shall disclose to Nexa Trade any potential or existing conflict of interest situation in its relationship with Nexa Trade.

## **4. Human and labour rights**

Nexa Trade respects the rights enshrined in the Universal Declaration of Human Rights and the fundamental rights in the eight core conventions of the International Labour Organization which form the basis for Nexa Trade's Human Rights Commitment. The Suppliers are expected to respect the same rights and, at a minimum, the Supplier shall:

- 4.1** Adhere to applicable laws regarding working hours, minimum wages, overtime, sufficient breaks and rest time, sick leave and annual holidays, as well as parental leave and mandatory benefits (e.g., social security), and have appropriate records of these in place;
- 4.2.** Ensure that all employees are made aware of the key terms of their employment prior to commitment to work;
- 4.3** Not employ any workers younger than 15 years of age, protect workers of ages 15 - 17 from work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety or morals, and establish systems to ensure fulfilment of and follow-up on these requirements;
- 4.4** Not use any compulsory or forced labour, and ensure that recruitment fees and associated costs are not borne by workers;
- 4.5** provide equal opportunity and treatment in employment, without regard to race, colour, religion, sex, political opinion, national extraction, social origin or any other similar distinction which is not based on the inherent requirements of the work;
- 4.6.** not tolerate any type of harassment of its employees whether direct or indirect, physical or verbal; and
- 4.7** recognise and respect employees' right to organize freely and bargain collectively.

## **5. Occupational health, safety and security**

The Supplier shall provide its employees with a healthy, safe and secure workplace in compliance with all laws and regulations applicable to its operations. At a minimum, the Supplier shall:

- 5.1** Comply with Nexa Trade's Life Saving Rules when working at Nexa Trade premises, available at [www.nexa.trade](http://www.nexa.trade)
- 5.2** Comply with health and safety requirements if, and to the extent, separately agreed with Nexa Trade;

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**5.3.** Ensure that appropriate health and safety information and equipment are provided to its employees and contractors; and

**5.4** Provide employees and contractors with drinking water, clean toilets, adequate ventilation, emergency exits, proper lighting and access to first aid supplies or other provision for emergency care.

## **6. Environmental impact and climate change**

The Supplier shall support a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility. The Supplier is encouraged to establish and implement procedures to minimize any adverse impact of its operations on the environment and to demonstrate continuous improvements therein. At a minimum, the Supplier shall, in its operation:

**6.1** Fulfil applicable environmental requirements set forth in relevant laws, regulations and environmental permits in the jurisdiction where the Supplier operates;

**6.2** Monitor, control and appropriately treat wastewater, air emissions and waste generated from its operations including, without limitation, the treatment of hazardous waste, in compliance with applicable legislation and process manufacturer's instructions; and

**6.3** consider the climate impact of its operations and undertake greenhouse gas reduction measures where reasonable.

## **7. Reporting**

**7.1** The Supplier shall report any non-compliance with this Code to Nexa Trade Chief Compliance Officer, FDRK0250, Compass Building, Al Shohada Road, AL Hamra Industrial Zone-FZ, Ras Al Khaimah, United Arab Emirates

**7.2** Nexa Trade's business partners and other stakeholders may report suspected violations (anonymously and confidentially) by using Nexa Trade Ethics Online at: [www.nexa.trade](http://www.nexa.trade)

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