

# P/mint Supplier Code of Conduct

## Purpose and Scope

Reputation and success P/mint sp. z o.o. (hereinafter „P/mint”) starts with an unwavering commitment to honest and ethical business practices. Our long-standing value of Do the Right Thing reflects our culture of ethics and compliance, and forms the basis for this Supplier Code of Conduct (“Supplier Code”). Our expectation is that Suppliers will always Do the Right Thing and follow this Supplier Code at all times and in all situations. The Supplier Code sets forth our requirements in the areas of business integrity, labor practices, associate health and safety, and environmental management with respect to business activity relating to or being conducted on behalf of P/mint.

Suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with P/mint entities (collectively hereafter referred to as “Supplier” or “Suppliers”) are required to follow the Supplier Code. Failure to comply with the Supplier Code may result in the termination of P/mint relationship with a Supplier.

### 1. Maintain Knowledge of and Comply with Applicable Laws

Suppliers must maintain awareness and understanding of and comply with all applicable laws and regulations of the countries of their operation, including, but not limited to, all laws relating to anti-bribery and kickbacks, anti-corruption, insider trading, export compliance, economic sanctions and anti-boycott, money laundering and human trafficking.

### 2. Engage in Free and Fair Competition

A free and fair market ensures that our customers receive the best quality products at the best value. Suppliers must not engage in activities that illegally restrain free and fair competition, such as price fixing, bid rigging or market division

### 3. Conduct Business with Integrity, Free of Corruption

Suppliers must not sacrifice integrity to get business or business advantages – no matter the size or benefit to the Supplier or P/mint. Obtaining or attempting to obtain business or a business advantage or personal benefit through improper or illegal means is strictly prohibited. Suppliers must not give or receive bribes or kickbacks of any kind, obtain business through extortion or other corrupt methods or engage in transactions involving proceeds derived from unlawful activities.

If Supplier is aware of anyone soliciting or accepting a bribe, kickback or anything of value with respect to P/mint business or other corrupt activity, Supplier must immediately notify P/mint Legal Department.

### 4. Doing Business with Governments Carries Heightened Compliance Obligations.

Suppliers are expected to be knowledgeable about applicable anti-corruption laws and take steps to ensure that personnel are adequately trained to ensure compliance. Suppliers must scrupulously abide by all anti-corruption laws.

Suppliers must not, directly or through a third party, offer to provide, promise to provide, or authorize providing anything of value, directly or indirectly, to any government official to improperly secure a benefit for the Supplier or P/mint, including but not limited to, winning a contract, influencing the procurement process avoiding customs duties, expediting the import/export or permit process, gaining access to non-public bids, evading taxes or penalties, obtaining exceptions to regulations, influencing litigation, preventing contract termination. A “government official” includes: any officer or employee of a government or any department, agency, or instrumentality thereof. “Anything of value” includes, but is not limited to, cash or a cash equivalent (gift cards), gifts, travel expenses and/or payment of personal expenses, services, sports outings or other entertainment, charitable donations, medical treatment, loans, jobs for relatives, business courtesy, meal, entertainment or promise of a benefit. It does not matter if such activity is being carried out in a country where paying bribes is a common practice. Such activity is strictly prohibited – whether conducted directly or through a third party intermediary.

## **5. Protect Confidentiality**

Suppliers with access to confidential information must not disclose such information to any other company or person without advanced written consent from P/mint. Confidential information includes, but is not limited to:

- Product specifications
- Product content
- Account information
- P/mint brand (logo, name and tag line) in Supplier advertisements or references, this includes written, electronic, visual or verbal communication.

Supplier procedures must be in place to ensure that confidential information is protected against unauthorized disclosure and theft. P/mint must be notified by Supplier, if they become aware of an actual or possible unauthorized disclosure of P/mint information.

## **6. Compliance with all export/import regulations and international economic sanctions**

The Supplier must strictly comply with all import and export regulations, trade control measures, and trade compliance laws and regulations, regardless of the country in which it operates. These regulations include, among others, imposed export control measures, trade sanctions and boycotts that restrict the export of certain products to specific destinations, persons, or for particular uses.

## **7. Encourage a Diverse Workforce and Provide a Workplace Free from Discrimination, Harassment, Retaliation and Any Other Form of Abuse**

P/mint expects its Suppliers to provide and foster a diverse and inclusive workplace. Suppliers shall conduct their workplace and business activities free from discrimination or harassment based on race, religion, creed, color, national origin, ancestry, sex, gender, pregnancy or related conditions, age, physical or mental disability, sexual orientation, gender identity, genetic information or any other basis protected by local law. Suppliers shall treat business partners and employees with respect and dignity, without regard to any protected category.

**8. Treat Employees Fairly, Including with Respect to Wages, Working Hours and Benefits.**

Suppliers shall comply with all applicable legal and regulatory requirements relating to working hours, wages and benefits, including, but not limited to those pertaining to minimum wage, overtime, maximum working hours, rest and meal breaks, and time and recordkeeping.

**9. Prohibit All Forms of Forced or Compulsory Labor**

P/mint prohibits forced and compulsory labor and human trafficking and will not do business with any Supplier that engages in compulsory labor or human trafficking. Suppliers shall not use physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse or confiscate identify, immigration or work authorization documents as a method of discipline or control.

**10. Prohibit the Use of Child Labor**

Suppliers shall adhere to minimum employment age limits required by applicable law and regulation. In no instance shall a Supplier permit children to perform work that exposes them to undue physical risks that can harm physical, mental, or emotional development or improperly interfere with their schooling needs.

**11. Respect Employees' Right to Freedom of Association and Collective Bargaining, Consistent with Local Laws**

Consistent with applicable law, Suppliers shall respect employees' rights to join or refrain from joining associations and worker organizations.

**12. Provide Safe and Healthy Working Conditions**

Suppliers shall proactively manage health and safety risks to provide an environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industry. Also, Suppliers shall provide potable drinking water and adequate restrooms; fire exits and essential fire safety equipment; emergency aid kits and access to emergency response including environmental, fire and medical.

**13. Carry Out Operations with Care for the Environment and Comply with All Applicable Environmental Laws and Regulations**

Suppliers must comply with all applicable environmental laws and regulations and abide by three principles on the environment:

- Support a precautionary approach to environmental change,
- Undertake initiatives to promote greater environmental responsibility, and
- Encourage the development and diffusion of environmentally friendly technologies.

To comply with these principles, Suppliers are to ensure that the resources and materials (including precious metals) they use are:

- Sustainable;
- Capable of being recycled;

- Used effectively with a minimum of waste unless P/mint specifically requests a Supplier to use a specific product or material; and
- Processes are planned, monitored and conducted in such a way to ensure environmental impacts are minimized.
- Suppliers must not use resources or materials that result in PFAS or any known carcinogen being brought onto any P/mint premises or incorporated into any P/mint materials.

#### **14. Maintain Accurate Records and Bookkeeping**

Suppliers must maintain and retain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices. Supplier payments, reports, records and filings made in the course of business must be accurate and truthful. No one may falsify or improperly alter any information contained in the Supplier's records. If signing a document, Supplier must ensure its accuracy. If Supplier knows of an inaccuracy in a Supplier or P/mint document, Supplier must report it immediately to P/mint's Legal Department.

For example:

- All funds, assets, transactions and payments must be accurately reflected;
- Payments for goods and services provided to P/mint must be payable to the company legally entitled to receive payment;
- All invoices must accurately reflect the items and services being purchased or sold and the prices being paid;
- Discounts must be included in the price or otherwise stated on our invoices;
- Documents and records must also be retained for the appropriate period of time as required by company policy or by the law;

#### **15. Deliver Products and Services Meeting Applicable Quality and Safety Standards P/mint is committed to producing high quality and safe products across all of our brands.**

Suppliers providing services for P/mint or involved in any aspect of developing, handling, packaging or storing our products are expected to:

- Know and comply with the product quality standards, policies, specifications, and procedures that apply to the products produced at your location;
- Follow and adhere to good manufacturing practices and testing protocols;
- Report issues immediately to P/mint that could negatively affect the quality or public perception of a P/mint product; and
- Provide Safety Data Sheets (SDs) or technical documentation upon request, immediately.

#### **16. Respect Animal Welfare**

Suppliers must ensure that they do not conduct, or cause third parties to conduct, any animal testing on products, raw materials or components of finished products supplied to P/mint, unless such testing is necessary to meet the requirements of applicable laws or regulations.

## 17. Observe P/mint's Policies Regarding Gifts, Entertainment and Conflicts of Interest when Dealing with P/mint Employees

Suppliers doing business or seeking to do business with P/mint are prohibited from providing gifts, entertainment, favors, gratuities, and cash or cash equivalents to employees. Such gifts could influence an employee's ability to make appropriate judgments in the interests of the business. Modest business courtesies are acceptable only in connection with legitimate business purposes.

## 18. Adhere P/mint On site Visit rules

Supplier inquiries should be directed to [SupplierCoC@p-mint.eu](mailto:SupplierCoC@p-mint.eu)

Supplier site visits must be for valid business purposes and Suppliers must perform the following prior to visiting P/mint locations:

- Obtain approval from Department Manager/Supervisor (where the visit is planned) prior to visit,
- Have acknowledged understanding and receipt of P/mint's safety manual. „Arrangement on cooperation to ensure safety at work, the course of action in situation threatening life or health and environmental protection on the premises of P/mint Sp. z o.o. in Wyszaków”.
- Have completed P/mint's onsite safety orientation if needed.

## 19. Support Compliance with the Supplier Code

Suppliers must establish appropriate management processes and cooperate with reasonable assessment processes requested by P/mint. To conduct business with P/mint, Suppliers must enter into contracts and execute purchase orders that mandate compliance with the Supplier Code. With prior notice, P/mint may conduct reasonable audits to verify Supplier's compliance with the Supplier Code.

P/mint expects Suppliers to act responsibly in all respects and to ensure that no abusive, exploitative or illegal conditions exist in their supply chains. Suppliers must also require that their subcontractors and vendors abide by the requirements and values as set out in the Supplier Code.

## 20. Reporting Suspected Violations of the Supplier Code

Suspected violations of the Supplier Code may be reported either openly or anonymously to the following address: [SupplierCoC@p-mint.eu](mailto:SupplierCoC@p-mint.eu)

No supplier may take retaliatory action against any employee for submitting a complaint in good faith or for participating in an investigation under this Supplier Code.