

# CODE OF ETHICAL CONDUCT FOR THE SUPPLIERS

OF PCC EXOL SA





# 01

## INTRODUCTION

CODE OF ETHICAL CONDUCT  
FOR THE SUPPLIERS OF PCC EXOL SA



**Ethics is like chemistry** – its values define us to the world,  
its reactions are complex, but they enhance anything they interact with.



## Introduction

PCC EXOL SA is a leading producer of surfactants (surface-active agents) in Central and Eastern Europe. The extremely wide portfolio of products and the variety of their uses allow the Company to operate in different international markets. Such wide-scale operations mean great responsibility towards the environment and society. Thus, PCC EXOL SA pays special attention to the matters of sustainable development and responsible business. It follows a business strategy, which is compliant with the interests of those around and based on the responsible use of resources in the entire value chain.

The operations of PCC EXOL SA are governed by the law resulting from the relevant directives of the European Union, national legal regulations as well as the provisions of the international, transnational, national and regional law. All of these regulations provide a framework of business, setting norms and standards of the Company operations. They specify the ways to conduct our business in various markets and affect the conditions of cooperation with our stakeholders, including Suppliers of raw materials, materials or services.

PCC EXOL SA uses its best endeavours to conduct its business with due regard to the rights of an individual and the environmental protection laws. In 2014 the company joined the United Nations Global Compact, operating to the benefit of sustainable development. The Global Compact Principles, as a globally recognized and universal set of standards, are the basis of our relationships with business partners.

PCC EXOL SA tries to cooperate with Suppliers that maintain the same high ethical standards. This Code of Ethical Conduct is the foundation, on which we build our relationships based on trust, integrity, respect for the rights of an individual, compliance with the law and conducting business in line with the idea of sustainable development.

The Code of Conduct for the Suppliers of PCC EXOL SA aims to promote and implement the ethical values in the supply chain of the Company. It helps to ensure compliance with international standards and guidelines such as:

- UN 2030 Agenda for Sustainable Development
- The Universal Declaration of Human Rights
- Conventions of the International Labour Organization (ILO)
- Responsible Care Program
- Diversity Charter
- RSPO – Roundtable on Sustainable Palm Oil.

PCC EXOL SA is oriented on conscious compliance with social, ecological and ethical standards. The mission of the Management Board in this respect, is to promote these standards not only among its employees. PCC EXOL SA expects its stakeholders to respect the principles set forth in this Code. Respecting the principles set forth herein is an important criterion for the selection and qualification of Suppliers.



# THE MESSAGE FROM THE BOARD

## The Message from the Board

**Dear Sirs,**

In August 2015, 193 UN Member States came to a compromise on the final document of the new '2030 Agenda for the Sustainable Development'. It is based on 17 main objectives and 169 tasks connected thereto, including a number of social, economic and environmental aspects. It sets the direction for global activities geared towards responding to social and economic challenges, in which PCC EXOL SA already actively participates. The objectives of the global Agenda should constitute the framework for joint activities, that support sustainable development in each branch of the Polish economy. Due to this reason, all companies, as part of their business strategies, should already have defined objectives, when it comes to sustainable production and consumption strategy. It is a fact that, the impulses to act have been reaching supply chain managers in the chemical industry from many directions and for some time now. They will decide whether to use the prevailing trends as opportunities for their organisations or whether to treat them as threats and market barriers. PCC EXOL SA, as a leader in the production of surfactants in the Central and Eastern Europe, functions in the environment, where the best chance of success lies with the producers that in addition to high quality products, attractive prices or new application solutions, offer their customers a number of added, intangible values such as, for example, ethical citizenship. The investment in building strong communities inside and outside the company is an integral part of it. It emphasizes commitment to sustainable future, acting as a solid platform for our business.

**Mirosław Siwinski**  
President of the Board  
PCC Exol SA

**Rafał Zdon**  
Vice-President of the Board  
PCC Exol SA



# 02

## CONTINUOUS IMPROVEMENT

### CODE OF ETHICAL CONDUCT FOR THE SUPPLIERS OF PCC EXOL SA

PCC EXOL SA understands that reaching the standards defined in this Code of Conduct is not a one-off achievement and encourages its Suppliers to continue their efforts aimed at improving the quality and enforcing the ethical values throughout the entire supply chain.

Therefore, we provide this Code of Conduct to our Suppliers, in order to effectively build our mutual understanding of a practical approach to sustainable development at all levels of our cooperation.



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## PCC EXOL SA IDENTIFIES FOUR PILLARS OF ETHICAL CONDUCT FOR THE SUPPLIERS

PCC EXOL SA identifies four pillars of ethical conduct for the Suppliers

1. Integrity and transparency in business
2. Safety, health and environmental protection
3. Human rights
4. Responsible management



# 1. INTEGRITY AND TRANSPARENCY IN BUSINESS



PCC EXOL SA requires that its Suppliers conduct their business in an ethical, fair and transparent manner. The requirements of the Company concerning compliance with the principles of the business ethics include as follows:

- **Compliance with laws and regulations** – The Suppliers of PCC EXOL SA shall comply with the applicable national and international laws and regulations.
- **Integrity in business** – The Suppliers of PCC EXOL SA neither commit nor tolerate any forms of bribery, fraud or corruption. The co-operation of the Supplier with PCC EXOL SA must be carried out in accordance with the applicable laws.
- **Fair competition** – The Suppliers of PCC EXOL SA run their business in accordance with the principles of fair competition and any applicable antitrust laws.
- **Confidentiality, discretion and data protection**  
The Suppliers of PCC EXOL SA:
  - Secure confidential information and use it only in an appropriate manner
  - Ensure protection of privacy and intellectual property of both their employees and contractors
  - Guarantee the protection of personal data of their employees and all their stakeholders
- **Reporting of complaints and incidents**  
The Suppliers of PCC EXOL SA enable their employees to openly or anonymously report their concerns or potentially illegal acts at the workplace. Any such notification must be kept confidential. The Suppliers shall examine such notifications and take corrective action if it is necessary.



## 2. SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION



The Suppliers of PCC EXOL SA are required to ensure safe and healthy working environment and to act in a responsible and eco-friendly manner. This pillar includes the following areas:

- **Health, safety and environmental protection regulations** — The Suppliers of PCC EXOL SA operate in accordance with all applicable laws relating to the health of workers, health and safety at work, and environmental protection. The Suppliers operate in compliance with all required and valid permits, licenses, and registrations and other normative acts that allow them to conduct their business in accordance with the applicable legal regulations. The Suppliers meet the operational and reporting requirements that apply to them.
- **Health and safety at work** — The Suppliers of PCC EXOL SA are obliged to ensure the safety and health of their employees at work, and to ensure the safety and appropriate quality of the supplied products. To this end, the Suppliers are expected to act in accordance with the applicable legal regulations and have implemented procedures relating to the safety of both the employees and products manufactured by the Supplier.
- **Process safety** — The Suppliers of PCC EXOL SA deploy safety programs and systems to manage all production processes and to maintain their compliance with the applicable safety standards.
- **Emergency procedures** — The Suppliers of PCC EXOL SA shall identify any hazards at the workplace. The employees of the Suppliers have been trained in order to give them suitable protection. The Suppliers analyse potential risks and implement preventive measures. They minimise the effects of risks by implementing the contingency plans and procedures of rapid response in emergency situations.
- **Environmental protection** — The Suppliers of PCC EXOL SA are expected to comply with all applicable regulations and standards to ensure safe handling of air emissions, wastewater and any other waste. The Suppliers have implemented systems to prevent accidental leakage and emissions into the environment or minimise their effects.
- **Climate protection and natural resources** — The Suppliers of PCC EXOL SA are expected to continually and effectively reduce the negative environmental impact, using any possible and available practices. The Suppliers of PCC EXOL SA use the natural resources in a rational, and economical way and act in order to reduce the energy consumption and greenhouse gas emissions.



### 3. HUMAN RIGHTS



PCC EXOL SA recognises the rules concerning, among other things, respect for the human rights as defined in the guidelines of UN Global Compact, the Universal Declaration of Human Rights, and in the Convention of the International Labour Organization (ILO). Consequently, the Company expects its Suppliers to respect the human rights of employees and to treat them with dignity and respect. This includes the following:

- **Avoiding child labour** — In their business, the Suppliers shall refrain from all forms of child labour.
- **Voluntary employment** — The Suppliers of PCC EXOL SA shall not obtain any benefits from forced labour, slave labour, forced labour of apprentices or prisoners.
- **No discrimination** — No employees can be discriminated, aggrieved or excluded from the community based on race, skin colour, nationality, ethnic origin, religion, gender, age, physical characteristics, or appearance, political beliefs, sexual orientation, disability, hereditary diseases and other, parenting, social status, union membership and other factors. The Suppliers of PCC EXOL SA guarantee that their employees are not harassed or discriminated in any way.
- **Fair treatment** — In the work environment, the Suppliers of PCC EXOL SA do not tolerate any manifestations of physical or psychological violence or sexual abuse, or insulting the employees, or attempts to intimidate them or any other manifestations of inhuman treatment of employees.
- **Working time and remuneration** — The Suppliers of PCC EXOL SA guarantee that the working time of their employees does not exceed the maximum level specified by the national law in force, applicable to the Supplier's place of business. The remuneration paid to the employees of the Supplier complies with the applicable national regulations concerning salaries and ensures an appropriate standard of living.
- **Freedom of association** — In accordance with the local law, the Suppliers of PCC EXOL SA respect the employees' right to freedom of association and the right to take part into collective bargaining of employment conditions.



## 4. RESPONSIBLE MANAGEMENT

PCC EXOL SA expects active deployment and maintenance of processes conducive to improvement of the Suppliers in the following areas:

- Risk management
- Compliance with the legal requirements
- Implementation of the business ethics in the entire supply chain
- Keeping complete and transparent documentation
- Training and upgrading qualifications of employees

### UN Agenda for the Sustainable Development

<http://www.un.org/sustainabledevelopment/sustainable-development-goals/>

### United Nations Global Compact

[www.unglobalcompact.org](http://www.unglobalcompact.org)

### The Universal Declaration of Human Rights

[www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)

### International Labour Standards (ILO– International Labour Organisation)

[www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm.ilo.org](http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm.ilo.org)

### Responsible & Care Program

[www.rc.com.pl/](http://www.rc.com.pl/)

[www.responsiblecare.org](http://www.responsiblecare.org)

### Diversity Charter

[www.kartaroznorodnosci.pl](http://www.kartaroznorodnosci.pl)

[www.kartaroznorodnosci.pl/pl/en](http://www.kartaroznorodnosci.pl/pl/en)

### PCC EXOL SA – Safety Rules

[www.pcc-exol.eu/bazy/exol.nsf/id/PL\\_Bezpieczenstwo](http://www.pcc-exol.eu/bazy/exol.nsf/id/PL_Bezpieczenstwo)

[www.pcc-exol.eu/bazy/exol.nsf/id/EN\\_Safety\\_Rules](http://www.pcc-exol.eu/bazy/exol.nsf/id/EN_Safety_Rules)

[www.pcc.rokita.pl/bazy/www.nsf/id/PL\\_Bezpieczenstwo](http://www.pcc.rokita.pl/bazy/www.nsf/id/PL_Bezpieczenstwo)

[www.pcc.rokita.pl/bazy/www.nsf/id/EN\\_Safety\\_Rules](http://www.pcc.rokita.pl/bazy/www.nsf/id/EN_Safety_Rules)

### RSPO (Roundtable on Sustainable Palm Oil.)

[www.rspo.org/](http://www.rspo.org/)







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