



## R. T. VANDERBILT HOLDING COMPANY, INC. SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct sets forth the basic principles for suppliers working with R. T. Vanderbilt Holding Company, Inc., its wholly-owned subsidiaries and affiliates. Vanderbilt is committed to these principles and expects its suppliers to also be committed throughout their operations and throughout their entire supply chain.

### **Human Rights & Labor**

- Suppliers shall treat their employees with respect, comply with all applicable laws and regulations, and conduct their business in an ethical manner.
- Suppliers shall support the protection of internationally proclaimed human rights and shall not be complicit in human rights abuses.
- Suppliers shall not engage in any kind of compulsory labor (including prison labor, indentured labor, or bonded labor) or child labor (including children under the age of 15).
- Suppliers shall fight discrimination in the workplace.
- Suppliers shall comply with social and minimum standards, such as minimum wages and benefits, fair working hours, freedom of association, freedom of movement and collective bargaining. Suppliers shall not subject workers to corporal punishment, or any form of abuse or harassment. Suppliers shall ensure that workers have a mechanism to report grievances.
- Suppliers of Conflict Minerals (including gold, tungsten, tin, and tantalum) shall comply with applicable laws related to Conflict Minerals Sourcing. Suppliers must have a due diligence process in place which traces such minerals back to their origin, and upon request, provide evidence of accuracy and validity of the sourcing of the minerals.

### **Environment, Health, & Safety**

Vanderbilt is committed to the American Chemistry Council's Responsible Care Management System® and has implemented it across its businesses.

- Suppliers shall comply with all applicable health, safety and environmental laws, including international treaties, and regulations.
- Suppliers shall use resources efficiently, reduce waste, and minimize the impact of operations on air, water, and soil.

## **Ethics & Legal Requirements**

- Suppliers must maintain the highest ethical standards.
- Suppliers shall comply with all applicable national and international trade laws and regulations including antitrust, trade controls and sanction regimes.
- Suppliers shall avoid conflicts of interest.
- Suppliers shall engage in fair competition.
- Suppliers shall protect confidential information and intellectual property.
- Suppliers shall not promise or transfer of anything of value, directly or indirectly to a government official in an attempt to improperly influence a business decision or secure an improper advantage for Vanderbilt and its Suppliers.
- Suppliers shall not promise, offer, or pay bribes, kickbacks, illegal gratuities, or similar payments to Vanderbilt personnel for the purpose of obtaining or retaining business with Vanderbilt.