



Code of Business Conduct for suppliers

Approved by Management Committee on 2026.06.01.

Note: This policy is released in English. In case of divergence between the English version and other translated versions, the English version will prevail.

Scope

This code applies to **all suppliers and contractors and their affiliates** as well as all products and services that Adhex purchases. We strongly encourage our suppliers to promote the requirements of this code of Business Conduct within their own supply chain. Adhex acknowledges that the Code of Ethics is not exhaustive.

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1. Introduction

The growing challenges the Adhex Group is facing require the implementation of a purchasing policy to meet the expectations and strategic orientations of our management committee.

Adhex is a market leader in technical adhesive solutions and stands as an active promoter of ethics and sustainability in all its forms. Adhex's commitment towards the 10 principles of the United Nations, Golbal Compact, and Development Goals, amongst others; the Group will work with its suppliers to:

1. Operate a lean supply chain that supports its corporate policies in the field of sustainability, whether in social matters (e.g. health and safety and the other labour rights; human rights), environmental or ethical topics.
2. Enhance supplier partnership and develop procurement solutions in line with customers, regulatory and wider stakeholders' needs and expectations.
3. Create long-term value and reduce risk for its business, suppliers and stakeholders. The Adhex Group's performance also highly depends on building long-term partnerships with our suppliers: this implies an economic balance between the stakeholders as well as the promotion of a collaborative approach (e.g., co-development, encouraging innovation).
4. Increasingly rely on a supply chain achieving strong and verified sustainability performance.

We will achieve these objectives by setting responsible and sustainable procurement standards and targets, by collaborating, innovating and embedding sustainable sourcing and purchasing into our business processes, assessment methods and performance monitoring systems.

"our ambition is to be a worldwide reference as a sustainable industrial company, a responsible employer and an innovative producer of special adhesives. Adhex is ready to take on its responsibilities with determination. This is the Adhex way of doing things right."



Roland de la Brosse

President of Adhex Group

The Code reflects good practices in the areas of environmental, social and governance standards, based on common and widely accepted business practices. We acknowledge that some of our suppliers may not be able to meet all the requirements of the Code straight away. This may be acceptable as long as the supplier can commit to implement an agreed action plan over a reasonable period. If a supplier refuses to make a commitment to meet these standards, we will seriously consider whether this is a supplier we can do business with. However, this decision will only be made as a last resort.

2. Compliance with law and regulation

Adhex expects and requires its Suppliers agree to act ethically and in compliance with all applicable laws and regulations as such as the United Kingdom Bribery Act or the American Foreign Corrupt Practices Act.

Adhex expects and requires its Suppliers agree to obtain their competitive edge only by superior products, technology, reliability, and the quality of services.

3. Responsible Business practices

Fair competition and antitrust

Adhex's suppliers respect fair competition and comply with antitrust laws which protect and promote fair, free, undistorted, and effective competition. Our suppliers will strictly comply with all applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing with unfair competition and restraints of trade.

Our suppliers will not enter into agreements with competitors or engage in other conducts that may unfairly impact competition, including, but not limited to, price fixing, bid rigging, or improper market allocations.

Anti-corruption and anti-bribery

Adhex has a zero-tolerance rule regarding corruption, bribery and extortion. The suppliers do the same by adopting anti-bribery policies, educating employees and taking actions against any acts of corruption and bribery.

We require from our suppliers to reject and prevent all forms of corruption, including what are known as facilitation payments (payments to speed up the performance of routine tasks by public officials, e.g. at customs clearance).

The supplier must ensure that its affiliates, directors, officers, employees, agents and sub-contractors do not directly or indirectly grant, offer, promise, approve, give, accept, request or solicit bribes, kickbacks, facilitation payments, improper donations or other improper payments or benefits (including the provision of socially inadequate entertainment and hospitality), to or from customers, government officials or other third parties, in order to improperly influence any act or decision of such customers, government officials or other third parties, to obtain or retain business or secure any improper advantage.

Our supplier refrains from offering or granting unreasonable and inappropriate benefits (including goods, services, invitations to non-work related cultural or sports events, recreational trips, private sales opportunities) to employees, directors or officers of Adhex to facilitate the supplier's business. This does not

apply to reasonable and socially adequate hospitality and product-related events in the usual course of business. Irrespective of the type of gifts and hospitality, the supplier must exclude any undue personal advantage and avoid any semblance of bribery, corruption or any other undue influence.

Note : If anyone from your company should report any type of wrongdoing witnessed at Adhex, it can be done anonymously at the following address: www.whistleblowing.adhex.com (hyperlink also available on our website: www.adhex.com)

Avoiding conflicts of interest

The supplier makes decisions solely based on objective criteria and disclose to Adhex any situation that might appear as a conflict of interest. Our supplier must inform Adhex if, to the best of their knowledge, an employee, director, officer or an agent of Adhex may have an interest of any kind in the suppliers' business or any kind of economic ties with the supplier.

Anti-money laundering and prohibition of terrorism financing

Our supplier ensures compliance with all applicable laws and regulations against money laundering and terrorism financing. He makes sure that they know their suppliers, and report immediately to the competent authorities if there are facts which indicate that a case of money laundering has occurred.

Export controls and economic sanctions

Our supplier maintains and enforces policies, procedures and safeguards to ensure compliance with applicable customs regulations, export/import restrictive measures, including economic sanctions.

The suppliers undertake:

- to comply with all applicable sanctions and export control laws and regulations
- not to use any funds or economic resources related to the business relationship (or parts of it) with Adhex, or make them available, directly or indirectly to any sanctioned person
- not to otherwise engage, directly or indirectly, in any activity that would constitute a breach of, or cause Adhex to be in violation, of any restrictive measures.

The supplier ensures that their subsidiaries and affiliates in which they hold a decisive interest, or in which any of their members of the supervisory board or the management board have a financial interest, act accordingly. The supplier confirms that any item or goods being sold, exported, delivered or transferred within the business relationship with Adhex are either not restricted under applicable sanctions or export control restrictive measures, or in case there are

any restrictions, the respective supplier has obtained prior authorizations from any competent authority, in particular in the EU, UK and US, to export such items. In case the circumstances outlined above shall change or the supplier has a reason to believe that such circumstances may change, the supplier must notify Adhex in writing with immediate effect.

Data protection and data security, privacy and confidentiality

Our suppliers are expected to comply with all applicable laws concerning data protection and information security, ensuring that privacy is safeguarded, personal data is protected, and all business information is kept secure. They are expected to ensure that they cascade these principles in relation to information security and data privacy to any subcontractors or Tier-N suppliers.

Our suppliers must ensure that any confidential business information or trade secrets obtained under business activities with Adhex are held in strict confidence and not improperly used or revealed to third Parties.

Intellectual property

Our suppliers respect the legitimate intellectual property rights (including copyrights, software, designs, know-how, patents, and trademarks) of their suppliers and other third parties. Our suppliers are expected to develop, implement, and maintain effective methods and processes to minimize the risk of introducing counterfeit parts or materials into the supply chain.

4. Social Responsibility and Human Rights

At Adhex we are committed to respect entirely and at any time the human rights of our employees. Similarly, we also have strict requirements in terms of what we expect from our suppliers. Therefore, we expect our suppliers to conduct due diligence to understand the source of material used in their products, identify risk, and mitigate human rights breaches.

Safety and Health

Adhex requests its suppliers to eliminate all work-related injuries on their workforce and community, and to meet the standards of Adhex's Health and Safety Policy.

Human rights

Adhex defends Human Rights by adhering to the Universal Declaration of Human Rights of 10 December 1948 and the United Nations Guiding Principles for Business and Human Rights of 16 June 2011.

Our suppliers respect these internationally recognized human rights, and actively protect those rights of individuals or groups, irrespective of their nationality, place of residence, sex, national or ethnic origin, colour, religion, or any other status.

Prohibition of child labour and rights for young workers

Our suppliers do not tolerate child labour within their own operations or within their direct suppliers. They ensure that they do not employ directly or indirectly persons under the applicable legal minimum working age. They also respect all regulations for the protection of employees under the age of 18.

Prohibition of Forced Labour, modern slavery and unethical recruiting

Amongst all the other Human Rights that we respect and promote, we pay particular attention to all forms of forced labour and modern slavery which are prohibited across our entire Value Chain.

Our suppliers do not tolerate the use of any kind of slavery, servitude, forced or compulsory labour or human trafficking.

Furthermore, our suppliers do not mislead or defraud potential employees about the nature of work, ask employees to pay recruitment fees or inappropriate transportation fees, and/or confiscate, destroy, conceal, and/or deny access to employee passports and other identity documents issued by government and/or restrict the employees' freedom of movement or require employees to involuntarily use accommodation provided by the company for no operational reason.

Working hours

Our suppliers ensure that they comply with all applicable regulations on working hours including overtime, maximum hours, and rest periods, with a maximum of 48 hours per regular workweek with a rest period of at least 24 consecutive hours every seven days shall apply to prevent excessive physical and mental fatigue.

Freedom of speech, association and collective bargaining

Suppliers are committed to respect the rights of all employees to form and join trade unions and employee representations, and to engage in collective bargaining and strikes. This precludes any form of discrimination or retaliatory measures based on union activities. Even if such rights are restricted or not provided at all by local law, our suppliers ensure that the concerns of their

employees are heard and considered without fear of intimidation, harassment or retaliation.

Non-discrimination

Our suppliers respect the basic rights of employees and treat them fairly, promote diversity, equity and inclusion, and provide equal opportunities to all their employees, in particular, the payment of equal remuneration for work of equal value. Our suppliers ensure that their working environment is free from retaliation, discrimination, intimidation, harassment or any other improper conduct, for example based on ethnic decent, origin, nationality, religion, ideology, gender, sexual orientation, gender identity, age, disability, medical condition, race, colour or their social background or any other characteristics.

The suppliers commit themselves as their own partners to the promotion of diversity, women's rights, respect for the right of peoples to dispose of their natural resources and the right to health.

Ensure fair treatment, decent working conditions and decent wage

The suppliers pay at least an adequate living wage, which amounts to at least the minimum wage as laid down by the applicable law and, apart from that, is determined in accordance with the regulations of the place of employment that ensures an appropriate standard of living for their employees and their families.

Further requirements

No forced eviction, respect of land, forest and water rights

Our suppliers also comply with the prohibition of unlawful eviction and deprivation of land, forests and waters that serve as a person's livelihood during the whole production cycle

Community engagement

Adhex cooperates with the suppliers who respect the rights, the livelihoods, the cultures and traditions of local communities in each country where they operate. We encourage our suppliers to engage with the local communities, to identify their needs and support economic development, and to further contribute towards sustainability and deliver positive social impact.

Vulnerable groups

Adhex cooperates with the suppliers who respect the rights of minorities, indigenous people, women, children, human right defenders and other vulnerable

groups and strive to avoid any negative impact on them. Our Suppliers comply with the principles of free, prior, and informed consent of indigenous peoples in its activities in connection with their land and its cultivation as well as other natural resources.

Use of private or public security forces

Our suppliers ensure that the use of private or public security forces does not lead to violation of human rights, to torture and cruel, inhuman, or degrading treatment, damages to life or limb or to the impairment of the freedom of association. Our suppliers ensure as well not to contribute directly or indirectly to supporting private or public security forces that unlawfully exercise control over mining sites, transportation routes and upstream stakeholders in the supply chain.

5. Responsibility for the protection of the environment

Compliance with the applicable law and regulation

Our suppliers shall undertake to comply with all environmental laws, regulations, and rules applicable to them, at present or in the future. They must hold all authorizations and certifications required for their business operations and ensure that the supplies comply with the legislation in force in the countries in which they are operating.

Environmental policy

Adhex requests its suppliers to maintain effective policies, processes and procedures to manage their environmental impact and to operate their business in a manner that meets high standards in terms of management of Environmental impacts.

Energy Efficiency, decarbonisation, Product Carbon Footprint

Adhex's suppliers must endeavour to use energy more efficiently and avoid energy waste. We encourage to set energy efficiency targets and to monitor power and energy consumption, to adopt management practices, to switch off equipment not needed, and to reduce energy consumption, where possible. Our suppliers shall proactively support us in developing energy efficient products and solutions and reducing carbon emissions of our products. Indirect material suppliers shall proactively offer to Adhex more energy efficient products and solutions to enable us to lower our energy consumption and our carbon emissions. The Product Carbon Footprint including the CO₂e content per product shall be systematically offered to Adhex.

Waste management, Circular economy and recycled content

Adhex's suppliers manage and dispose of hazardous and non-hazardous waste generated from operations as required by applicable laws and regulations. Waste shall be stored, handled, transported and disposed of in a way that protects the health and safety of the workers and the environment. No waste shall be landfilled on site. Hazardous and non-hazardous wastes are kept separately. Waste shall not be incinerated on site, unless for the purpose of recovering energy. Records shall on request be made available on how, where, how much and by whom waste is treated. Opportunities to reduce, reuse and recycle waste shall be identified and implemented.

Our suppliers must endeavour to increase the recycled content in their products and solutions and shall inform systematically about the recycled content in each product offered to Adhex.

Our suppliers must endeavour to build or participate in building recycling loops when applicable to the offered products and solutions and shall inform systematically about the potential recyclability and recycling loops for each product offered to Adhex.

Substance of concern

Adhex's suppliers shall comply with any applicable laws and regulations such as REACH and RoHS prohibiting or restricting the use or handling of specific substances. To ensure safe handling, movement, storage, recycling, reuse, and disposal, the suppliers shall identify, manage and list Substances of Concern as required by Adhex (any presence of such substances shall be reported via prescribed reply form) and comply with applicable labelling laws and regulations for design, manufacturing, recycling and disposal.

Conflict of minerals

Our suppliers must ensure that they comply with all applicable supply chain due diligence obligations for the sourcing of raw materials, in particular conflict minerals (e.g., tin, tantalum, tungsten and gold, as provided in the Dodd-Frank Wall Street Reform Act, Sect. 1502, the Regulation (EU) 2017/821 and other similar legislations).

Pollution prevention (air, water, soil)

There shall be no severe environmental pollution. Any case of severe environmental pollution shall immediately be reported to Adhex and to any other authority required by law. Environmental complaints must be recorded and acted upon.

Air: Adhex's suppliers shall characterize, monitor, control, and treat emissions of volatile organic compounds, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated from operations, as required by applicable laws and regulations, before discharge.

Water: Adhex's suppliers shall monitor, control, and treat wastewater generated from operations before discharge as required by applicable laws and regulations. Adhex's suppliers shall take appropriate precautions to prevent contamination of stormwater runoff from their facilities.

Soil: Adhex's suppliers shall ensure compliance with applicable laws and regulations regarding ground contamination. The risk of ground contamination due to current or previous activities shall be investigated, assessed and acted upon. Environmental risks and impacts are identified and assessed to find ways to improve environmental performance.

Environmental improvement plans shall be implemented, reviewed and updated. Our suppliers shall investigate and assess the possible risks of ground contamination, due to previous or ongoing activities on the site

Further requirements

Land use, deforestation and biodiversity considerations

Adhex encourages the protection and restoration of the biodiversity. Business activities shall not be conducted in High Conservation Value Areas.

6. Responsibility for your compliance with this code

Adhex strongly recommends the compliance with these Code of Business Conduct throughout the entire supply chain which will help us achieve our sustainability goals.

We ask all our suppliers to read carefully, understand, apply and respect the principles established in this Code of Conduct.

This is the supplier's responsibility to take the required initiatives to guaranty that they penetrate down through your supply chain.

Adhex may conduct a visit in the suppliers's facilities or plants to verify the compliance status with the principles described in this Code of Conduct. Failure to comply with these principles or to come up with one, might prompt Adhex to request an immediate report, as well as steps to remediate and prevent similar scenario. Adhex may even decide to disengage from his supplier.

We require you to formally acknowledge and adhere to this Code upon onboarding and whenever materially updated.

7. References

Adhex references

- Adhex Code of Ethics | [Code of Ethics | Adhex](#)
- Adhex Responsible Procurement policy
- Adhex Human Rights policy
- Adhex Health, Safety and Environmental policy

International references

- United Nations' Human Rights Charter | [udhr booklet en web.pdf](#)
- International Labour Office | [International Labour Standards | International Labour Organization](#)
- United Nations' Global Compact | [The Ten Principles | UN Global Compact](#)