

# **TUBEX Supplier Code of Conduct**



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# 1. Purpose and scope

At TUBEX Aluminium Tubes, we are deeply committed to meeting the highest ethical, environmental and professional standards. Responsible sourcing is one of our core values and this is reflected in our Supplier Code of Conduct, through which we ask our suppliers to pursue the same goals.

As well as considering the economic and qualitative aspects, our purchasing decisions are also driven by social and ecological factors. From our business partners, we expect honesty, compliance with legislation and ethical standards, and a willingness to keep developing and improving.

In addition to complying with applicable laws, our suppliers must also ensure that their processes adhere to international standards – in particular to the ten principles of the UN Global Compact; to the ETI Base Code, which is founded on the conventions of the International Labour Organization (ILO); to the UN Convention against Corruption; and to the Rio Declaration on Environment and Development.

This **Supplier Code of Conduct** applies to all suppliers who provide us with goods and services. It forms part of the contracts we enter into with them and describes our expectations in respect of their ethical, social and environmental behaviour.



„As well as considering the economic and qualitative aspects, our purchasing decisions are also driven by social and ecological factors.“

## 2. Labour and human rights

Our human rights statement seeks to earn the trust of everyone involved in our operations, and demonstrates our commitment to ethics and human rights through our words and actions. An essential element of our human rights policy concerns labour rights and working conditions. The rights of our employees and of those working for our suppliers and business partners will always be respected.

We expect our suppliers to treat their employees with dignity and respect. Suppliers are obliged to foster a trusting work environment that is free of harassment, intimidation and unlawful discrimination. We do not accept discrimination of any kind – whether on the base of gender, race, family situation, sexual orientation, ethnicity, culture, union membership or religion. Bullying, harassment and similar behaviour are not tolerated.

Suppliers of TUBEX Aluminium Tubes must strictly comply with legislation on health, safety and working conditions. We also expect our suppliers to recognize the right of employees to freely associate and to comply with all local laws governing the right of employees to select or not select workplace representatives. Employees who act as workers' representatives shall not be disadvantaged or discriminated against because of their role.

### **Our suppliers must neither support nor engage in:**

- Child labour
- Forced or compulsory labour
- Unlawful discrimination or harassment of any kind
- Any activities relating to trafficking



„We expect our suppliers to treat their employees with dignity and respect.“

## 3. Health and safety

TUBEX Aluminium Tubes expects its suppliers to strictly comply with applicable health and safety laws and standards for a safe and healthy working environment, and to take appropriate measures for implementing these. All employees shall receive training to raise safety awareness and to build confidence

and skills for dealing with security threats and preventing accidents. Our business partners are also required to ensure the effectiveness of health & safety measures by identifying, monitoring and managing occupational health & safety risks.

## 4. Product security and quality

We want the products and services from TUBEX Aluminium Tubes to always be at the forefront of the industry in terms of quality and reliability. In order to fulfil this aim, we set ourselves the highest standards, which we also expect our suppliers to meet.

Integrated standards and processes must meet generally recognised or contractually agreed requirements in terms of product security, quality and hygiene throughout the whole supply chain.



„We set ourselves the highest standards, which we also expect our suppliers to meet.“

# 5. Business ethics

## Combating corruption

We do not tolerate any form of corruption in our global business operations. Corruption is banned by international conventions, national laws and our own internal guidelines. TUBEX Aluminium Tubes does not tolerate any form of bribery among employees or business partners, or any business practices that could create the impression of improper influence.

All TUBEX Aluminium Tubes employees are prohibited from directly or indirectly demanding, accepting, offering or granting advantages in business transactions that are designed to dishonestly influence business procedures, or that create the impression of doing so.

We have a zero-tolerance policy on accepting gifts of an inappropriate value, or those that corrupt. Our employees will only give and accept small gifts, providing they do not intend to influence business decisions or create the impression of doing so.

## Fair and free market behaviour

We fully endorse the principles of fair and free competition as a fundamental component of the market economy. Our suppliers' business practices must comply with the requirements of antitrust law and competition law.

## Information handling and data protection

Our suppliers must protect intellectual property rights and the confidentiality of sensitive information, data and corporate secrets of their business partners. They are also obliged to ensure that the protection of rights to privacy complies with applicable laws in all business processes.

## Conflict minerals

TUBEX Aluminium Tubes requires all suppliers to conduct the necessary due diligence and provide us with proper verification of the country of origin and source of the materials used in the products that are supplied to us. Our suppliers are expected to ensure that the products delivered to TUBEX Aluminium Tubes do not contain conflict minerals.



### We reject:

- Any form of corruption in our global business operations
- Any form of bribery among employees or business partners
- Any business transactions that are designed to dishonestly influence our business procedures
- Any behaviour that is aimed at or results in the hindrance, restriction, or distortion of free and fair competition
- Violation of antitrust law



# 6. Environmental responsibility

We respect our planet's natural habitats and are committed to conserving resources and reducing environmental pollution. We work with our suppliers and customers to make our value chain greener – from sourcing and production to the use and disposal of our products.

## Environmental protection

We expect our suppliers to operate with respect for the environment and to comply with all applicable laws and regulations in the countries in which they are active. Reducing emissions, preserving natural resources, safely handling or avoiding hazardous waste, and promoting waste recycling and re-use shall have the highest priority and be appropriately managed. Our suppliers shall raise awareness and encourage participation in environmental matters internally and throughout their whole supply chain. Education and training in environmental matters shall be offered to employees.

## Environmental impact

We expect our suppliers to assess and identify the environmental impact of their business processes and products. Energy consumption and emissions caused by their business processes and products shall be measured, monitored and controlled with the aim of minimising their environmental impact. Any activities which have the potential to negatively impact human or environmental health shall be appropriately managed.

## Resource efficiency & the circular economy

Our suppliers shall use natural resources (energy, water and raw materials) in a responsible, efficient and sensitive way. We invest heavily in the sustainable development of our tubes and in the use of environmentally friendly technologies and materials, and we expect our suppliers to support us in the development of environmentally friendly products and processes.

“We expect our suppliers to support the circular economy and to use renewable and recyclable materials, as well as responsible sourcing.”



# 7. Compliance and monitoring

## Compliance

We expect all our suppliers and their employees to comply with all areas addressed by this Supplier Code of Conduct by doing the following:

- Respecting applicable laws and regulations of the countries in which they operate;
- Deploying mechanisms for identifying, managing and monitoring risks;
- Offering training and education for employees;
- Continuously improving their social, environmental and economic performance.

We also require our suppliers to communicate our expectations across the whole supply chain when doing business with TUBEX Aluminium Tubes.

In cases of non-compliance with this Supplier Code of Conduct we will request adequate corrective measures. In the event that there is no commitment or a lack of cooperation in correcting the non-compliance, or if the non-compliance means a major breach of contract, TUBEX Aluminium Tubes is entitled to terminate the cooperation or contract with the supplier immediately.

## Raising a concern/whistleblowing

Everyone is entitled to report any concerns about actions or decisions that go against the principles and standards set out in this Supplier Code of Conduct. If for any reason you feel unable to raise your concern with your usual contact, or you wish to remain anonymous, please use one of our compliance channels.

## What happens after a report has been received?

All incoming information will be processed quickly. As a first step, the information will be checked for conclusiveness and credibility. If these criteria are met, an internal investigation will be initiated. Everyone accused of a violation will have the opportunity to justify and explain their actions.

## Whistleblower protection and anonymity

People raising a concern in good faith will not experience any negative consequences. No reprisal of any kind against complainants will be made or tolerated. Anonymous reports should contain as much detailed information about the compliance violation as possible so that we can carry out an internal investigation if necessary.

## Confidentiality

Any notification of misconduct will be handled in a highly confidential manner. Disclosing the identity of whistleblowers also constitutes a violation of this Code.

## Monitoring

Acknowledging our Supplier Code of Conduct is a part of our supply contracts. We will regularly monitor compliance by using supplier questionnaires and/or by performing on-site audits. We expect our suppliers to actively audit and self-monitor their business processes in line with the scope of this Supplier Code of Conduct and to provide evidence to us upon request.

## How can violations be reported?



compliance@tubex-tube.com



Austria: + 43 4352 37488 700

Russia: + 7 921 423 53 17

Slovakia: + 421 45 678 06 83



Address of respective plant

To: Compliance



This Supplier Code of Conduct applies to all plants of TUBEX Aluminium Tubes:

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PL\_GR04.01\_Version: 1.1

Review date: 18.01.2025

Issued: 06.07.2020

Photos: Adobe Stock / Rene Knabl / TUBEX Aluminium Tubes

Published by: TUBEX Tubenfabrik Wolfsberg GmbH

CEO: Cornelius Grupp

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