

Group Code of Conduct

1. SUMMARY

Corporate integrity, responsible sourcing, environmental sustainability and the safety and wellbeing of workers in the countries where we do business are of paramount importance to the Zotefoams group of companies (**Zotefoams**) and aligned to our corporate purpose, delivery of optimal material solutions for the benefit of society. These core principles are reflected in this Supplier Code of Conduct (**Code**), which establishes the minimum standards and behaviours that must be met by any entity that supplies products or services to Zotefoams and we invite suppliers to sign a declaration of their adherence to this Code.

1.1 In summary, the principles underlying our Code are that all suppliers share Zotefoams' commitment to conducting business with the highest ethical standards and in full legal compliance. Specifically, we expect that our suppliers:

- Will not tolerate discrimination or harassment of any kind;
- Will not use funds received from the Company for political purposes, and will not make political contributions intended to obtain an improper business advantage;
- Will not pay or receive bribes;
- Will avoid and/or declare all conflicts of interest, whether actual or potential;
- Will act responsibly towards their local communities; and
- Will encourage and support their employees to speak up if they have a genuinely held concern about how their business is being conducted.

2. INTRODUCTION

2.1 We do not intend to summarise here every instance in which we may be called upon to observe and practise good business ethics. This summary aims to ensure that that suppliers follow and abide by sound ethical principles in day-to-day business conduct, and will promote an environment of mutual trust and respect and continue to be known as an organisation for its integrity.

2.2 We believe that trust promotes long-term business relationships built on honesty, openness, and fairness. All aspects of our business are based on the highest ethical standards. We are all part of the same team, and we must each take responsibility for our own actions and conduct. Suppliers should be familiar with how this Code applies not only to them, but also to any third parties they engage to supply Zotefoams. We expect everyone within the supplier's organisation to adhere to this Code. No supplier has the authority to waive or vary any part of this Code, and any attempt to do so may result in us reviewing, including potentially terminating, our relationship with the supplier.

2.3 If you have any questions about how this Code affects you or if you are aware of what you believe to be inappropriate, unethical, or unlawful conditions, please raise this in the first instance with your regular contact at Zotefoams and thereafter, if you feel the need to escalate your concern, with Zotefoams Company Secretary or Group Sustainability Manager.

3. EMPLOYMENT, DISCRIMINATION AND HARASSMENT

3.1 Subject to any local practices and business operational requirements, we expect our suppliers to offer unambiguous and fair terms of employment to its employees. Where it is legal to do so, suppliers are also encouraged to offer staff the freedom to join a union, associate or bargain collectively without fear of discrimination against the exercise of such freedoms. Zotefoams complies with the Employer Pays Principle in line with the Employer Pays Principle Policy, which states that suppliers must not charge worker paid recruitment fees. See below link for more information.

<https://www.ihrb.org/employerpays/the-employer-pays-principle>

- 3.2 Suppliers should provide working conditions which promote good health, safety and environmental practices.
- 3.3 Suppliers have a duty to act in a responsible manner in the workplace, having due regard for their colleagues' health, safety and general welfare.
- 3.4 Zotefoams values the diverse backgrounds and nationalities in its workforce and believes that it contributes to the businesses success. In turn we expect our suppliers to treat their staff, regardless of their nationality, race, religious beliefs, marital status, sexual orientation, disability or age, fairly and honestly with both respect and dignity. Harassment or bullying of any kind must not be tolerated by suppliers, whether sexual, physical, mental, abusive or offensive. Where any suppliers found to have acted in a discriminatory manner or bullied or harassed another person, they will be subject to business review. Suppliers are strongly encouraged to report any such incidents to their Zotefoams contact.
- 3.5 Zotefoams expects its suppliers to respect human rights, in particular,:
- Ensuring staff have the freedom to join a union, associate or bargain collectively without fear of discrimination against the exercise of such freedoms;
 - Not using forced labour or child labour;
 - Prohibiting the use of worker-paid fees, or parties acting on its behalf, such as an employment agency;
 - Prohibiting the confiscation of workers' original identification documents; and
 - Respecting the rights of privacy of staff and protecting access and use of their personal information.

4. CONDUCT AND BEHAVIOUR STANDARDS

- 4.1 All suppliers are expected to contribute to the success of Zotefoams by delivering work in a professional manner and to the standards of business conduct outlined in this policy.
- 4.2 Honesty and integrity are essential to ethical business practices. Suppliers are required to prepare all reports accurately and truthfully.
- 4.3 Any conduct that is considered to be detrimental to the best interests of Zotefoams may result in immediate disciplinary action in breach of contract and could lead to possible termination of business.
- 4.4 Misuse of Zotefoams' property, including equipment, supplies, e-mail, intranet, and IT and voicemail systems can constitute unethical conduct.

5. COMPLIANCE WITH THE LAW

- 5.1 We expect suppliers to follow applicable laws and regulations in all locations where they do business. Where a law might not explicitly address an ethical matter, suppliers must use good judgment to ensure that they adhere to the spirit of the law, and follow the principles of honesty, integrity, and common sense. Where a local law is stricter than our Code, we expect suppliers to follow, of course, that law, but, where it is not, we expect suppliers to adopt the principles of this Code as the base level for their conduct.

- 5.3 If there are any doubts or uncertainties about ethical questions or compliance with the law, the supplier should contact Zotefoams prior to taking any further action. Zotefoams has an 'open door' policy to bring any such queries, if necessary, to a higher level of management.

6. ETHICS IN THE MARKETPLACE

- 6.1 In promoting Zotefoams, Suppliers shall be clear, honest and truthful, but at the same time respecting that they may need to maintain confidentiality of certain matters that are not yet public. All parties shall be treated with respect and competition with peer companies should be fair and ethical. The following lists some of the major issues regarding ethics in the marketplace:

- There is nothing to be gained through misrepresentation, exaggerated claims or other forms of false advertising. Our products and services must stand on their own merits and quality.
- Zotefoams will not tolerate collaboration with competitors to establish, set or maintain prices or to restrain trade unlawfully.
- Customers should be given factual information about prices, schedules, services and other terms of business. Suppliers, subcontractors, advisers or representatives also deserve to be treated fairly, honestly and in accordance with agreed terms.
- Customers, suppliers, advisers or representatives may, occasionally, divulge confidential information. It is Zotefoams duty to respect these confidences in accordance with any applicable contractual and legal requirements.
- Complaints from customers, suppliers, subcontractors, advisers or representatives should be treated with respect, promptly and fairly.
- Whilst we should strive to gain an understanding of our competitors so that we can perform in the market place, we will not tolerate any industrial espionage.
- We will not knowingly infringe the copyright, trademarks, patents or other properly registered intellectual property of others.
- Management should have due regard as to how entering into new contracts or arrangements with others will affect the reputation and ethics of Zotefoams.

For further information please refer to the Anti-Competitive Practices Policy.

7. BRIBES OR OTHER PAYMENT TO INFLUENCE BUSINESS TRANSACTIONS

- 7.1 Zotefoams will not tolerate bribery and prohibits bribes of any kind. Suppliers are expected not to be seen as paying or receiving of any bribe or payment, including disproportionately lavish gifts or entertainment, to influence others or that may be perceived as being done with the objective of "facilitating" or expediting a routine procedure; or hope that an inappropriate business advantage will be received; or to reward an inappropriate business advantage already given; or to receive payment from a third party if you know or suspect that it is offered or provided with an expectation that an inappropriate business advantage will be provided.

For further information please refer to the Anti-Bribery and Corruption Policy.

8. CONFLICTS OF INTEREST

8.1 All conflicts of interest, whether actual or potential, should be avoided. Actions taken by suppliers should be objective and based on what is best for Zotefoams. Examples of possible conflicts could be (the list is not exhaustive):

- Accepting a personal payment from a supplier, this could be seen to be influencing business decision making.
- Working or providing consulting services, either directly or indirectly, for a competitor or engaging in an activity that might be competitive with the business interests of Zotefoams).
- Using Zotefoams customer lists or contacts for marketing a suppliers own goods or services.
- Dealing with a business that you, or a close member of your family, may have dealings with. Suppliers should disclose any such interest to the Company Secretary. You need not disclose shareholdings in companies, provided they are not significant and do not create a conflict of interest.
- Undertaking any private work which might generate intellectual property in the same industry as Zotefoams, as this might be difficult to distinguish this from the work of Zotefoams.

8.2 If you believe you have an actual or potential conflict of interest, please notify Zotefoams Company Secretary.

For further information please refer to the Anti-Bribery and Corruption Policy, Anti-Fraud Policy and the Share Dealing Code.

9. SLAVERY AND HUMAN TRAFFICKING

Zotefoams considers that its main exposure to the risk of modern slavery or human trafficking lies in its supply chains. This is because they involve the provision and use of labour.

9.1 We have zero tolerance of slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, Suppliers must adhere to our supply chain compliance programme which includes a detailed questionnaire. This forms an inherent part of our suppliers' approval process and requires suppliers to explicitly declare that, to the best of their knowledge, their organisation and supply chain are free from slavery. Zotefoams will repeat the Risk Assessment for our larger suppliers on an annual basis and we will continue to look out for and assess smaller suppliers more likely to be engaged in slavery type practices.

9.2 Zotefoams have a dedicated compliance team, comprising procurement staff trained in governance and legal issues. If any Supplier has any questions, please contact the Procurement team or the Company Secretary.

9.3 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we encourage suppliers to provide training to members of staff.

10. PROPRIETARY INFORMATION

10.1 Trade secrets, technology, knowhow, ideas, customer lists, unpublished financial data, marketing and pricing strategies, and business plans are some of Zotefoams' most valuable business assets. Every supplier has a duty to ensure they maintain the confidentiality over any such information they receive from Zotefoams and that such information is used only for

the purpose for which Zotefoams disclosed it. Disclosure of such information must not be made without proper authorisation. Our trade secrets are our intellectual property. They are what make our business special and set us apart from the competition. Suppliers have an obligation to protect our intellectual property. In your business with Zotefoams, you may be given or come into contact with information that is of a commercially sensitive nature, or is provided to you so that you may gain a better understanding of our business, for example, at briefing meetings. Depending on the type of information disclosed, you might not be permitted to tell your colleagues of this information or divulge it to anyone else outside the organisation. Breaching of this obligation may result in termination of business. If in doubt, you should seek clarification from the Company Secretary.

- 10.2 It is of the utmost importance to protect Zotefoams' information as it is vital to our continuing success. Inadequate protection of our information, or misusing it, could give the competition an unfair advantage, as well as diminish the quality of our products and services, increase the risk of litigation or otherwise harm Zotefoams. All Suppliers have an indirect responsibility to our customers, shareholders, to protect our information from unauthorised access, use, modification, destruction, theft, or disclosure and must treat such information confidentially.

For further information please refer to the Anti-Fraud Policy.

11. FAIR COMPETITION

- 11.1 Suppliers are expected to comply with the applicable compliance laws and regulations.

12. RAISING CONCERNS

- 12.1 If you suspect wrongdoing in the workplace (whether or not the suspected act has actually occurred), you should immediately report the matter to your usual contact at Zotefoams or the Company Secretary
- 12.2 Any reports made will be held in the strictest of confidence, although we may need to divulge your identity to the person investigating your concern. If we do so, we will discuss this with you first.
- 12.3 Zotefoams does not view a supplier who has raised a concern as a trouble-maker, but rather as a witness to an event. You will not suffer discrimination or persecution for raising concerns which are in the public interest, even if the concern is not proved and, if possible, you will be informed of the outcome.

13. MONITORING AND REVIEW

- 13.1 Zotefoams will monitor the effectiveness and review the implementation of this Code, regularly considering its suitability, adequacy and effectiveness, particularly in the light of changes to global business activity and scale of operation, working with suppliers to make success of the policy.

14. RESPONSIBLE BUSINESS

- 14.1 Suppliers and any sub-suppliers will have policies and procedures in place that are designed to:
- (i) ensure the efficient use of natural resources (air, water, natural gas and electricity) and reduce such use where possible;
 - (ii) reduce waste and limit emissions to air, water and soil
- 14.2 Suppliers are required to provide emissions data when requested for reporting purposes.