

**SUPPLIER CODE OF
CONDUCT
TROTON Sp. z o.o.**

I. INTRODUCTION

TROTON Sp. z o.o., as a manufacturer of paints, fillers, and primers, attaches particular importance to conducting its business in a socially responsible, ethical, and environmentally friendly manner. We believe that the success of our company depends not only on the quality of our products, but also on fair business relationships and joint actions in support of sustainable development.

This **Supplier Code of Conduct** defines the fundamental principles and values that guide our relationships with business partners. This document forms the basis for building long-term cooperation founded on trust, transparency, and respect for shared values.

We seek to cooperate with Suppliers who understand and share our approach and, above all, operate legally, ethically, and in accordance with the principles of sustainable development at every stage of cooperation.

OUR CORE VALUES

INTEGRITY – acting in accordance with the law and the highest ethical standards

RESPECT – for people, the environment, and diversity

RESPONSIBILITY – for our actions and their impact on the environment

QUALITY – in products, processes, and relationships

TRANSPARENCY – in communication and documentation

II. PRINCIPLES OF COOPERATION WITH SUPPLIERS

1. BUSINESS ETHICS AND INTEGRITY

We expect Suppliers to:

- Conduct business in compliance with applicable national and international law
- Respect the principles of fair competition
- Act in accordance with the highest ethical standards
- Neither practice nor tolerate corruption, bribery, extortion, or embezzlement
- Ensure full transparency and reliability in communication and commercial documentation
- Comply with conflict-of-interest rules

Practical application: Zero tolerance for any form of corruption. All transactions must be properly documented and compliant with applicable regulations.

2. HUMAN RIGHTS AND LABOUR STANDARDS

We expect Suppliers to:

- Respect human rights in accordance with the UN Universal Declaration of Human Rights
- Strictly prohibit child labour
- Not tolerate forced labour in any form
- Prevent all forms of discrimination (based on gender, age, race, origin, religion, sexual orientation, disability)
- Ensure safe and hygienic working conditions
- Respect employees' rights to freedom of association and social dialogue
- Provide fair remuneration and working time in compliance with applicable laws
- Not conduct operations nor source raw materials, products, or services from conflict-affected or war-occupied areas, directly or indirectly, in particular in ways that may contribute to the financing of armed activities, human rights violations, or breaches of international law

(SUPPLIER DECLARATION IS AN ATTACHMENT TO THIS CODE)

Practical application: All employees in the supply chain must be treated with dignity and respect, under conditions ensuring their safety and health.

3. ENVIRONMENTAL PROTECTION

We expect Suppliers to:

- Take actions to minimize negative environmental impact
- Use technologies and processes reducing pollutant emissions
- Manage natural resources and energy efficiently
- Reduce waste generation and strive for reuse
- Comply with all environmental protection regulations
- Identify and manage environmental risks in their operations
- Strive to implement an environmental management system (ISO 14001 preferred or equivalent)

Practical application: We support suppliers investing in clean technologies and climate protection initiatives.

4. CHEMICAL SAFETY AND PRODUCT QUALITY

Due to the specific nature of the chemical industry, special attention is required.

We expect Suppliers to:

- Deliver products meeting agreed quality specifications
- Comply with applicable safety regulations (REACH, CLP, and others)
- Ensure complete and up-to-date technical documentation
- Immediately inform about any product-related changes
- Identify and communicate risks associated with chemical substances
- Strive to eliminate substances of very high concern (SVHC)
- Continuously improve production processes to ensure the highest quality and safety standards

Practical application: Chemical safety is our priority – we expect full cooperation in regulatory compliance and risk management.

5. CONFIDENTIALITY AND DATA PROTECTION

We expect Suppliers to:

- Maintain confidentiality of all information provided by TROTON
- Process personal data in compliance with GDPR and applicable regulations
- Implement appropriate information security measures
- Not disclose confidential information to third parties without TROTON's consent
- Respect intellectual property rights

Practical application: Commercial, technical, and personal information must be protected against unauthorized access and misuse.

6. RESPONSIBLE SUPPLY CHAIN

We expect Suppliers to:

- Exercise due diligence in managing their own supply chains
- Apply similar standards to their suppliers and subcontractors
- Ensure transparency regarding the origin of materials and raw materials
- Deliver raw materials not sourced from conflict-affected areas or high-risk regions in accordance



with OECD due diligence guidelines

- Avoid materials originating from deforested areas
- Support local communities and economies

Practical application: ESG responsibility extends across the entire supply chain – cascading these requirements is expected.

7. INNOVATION AND CONTINUOUS IMPROVEMENT

We expect Suppliers to:

- Be open to innovation and new solutions
- Actively seek opportunities to improve processes and products
- Invest in research and development
- Share knowledge and best practices

Practical application: We support partners who, together with us, strive to develop more sustainable solutions for the industry.

III. COMMUNICATION AND COOPERATION

We expect:

- Open, honest, and constructive communication in all aspects of cooperation
- Timely notification of problems that may affect order fulfillment
- A proactive approach to resolving potential conflicts
- Cooperation in audits and compliance verification

We offer:

- Partnership-based relationships and long-term cooperation
- Support in developing sustainability standards
- Dialogue and exchange of experience
- Transparency in our expectations and requirements

IV. MONITORING AND COMPLIANCE

TROTON reserves the right to:

- Monitor Supplier compliance with this Code
- Conduct audits at Supplier facilities



- Request documentation confirming compliance
- Verify ESG-related practices

In case of violations:

- We expect immediate clarification
- We require corrective action plans
- We reserve the right to take corrective measures
- In extreme cases, cooperation may be suspended or terminated

V. REPORTING VIOLATIONS

We encourage reporting any breaches of this Code to:

zaopatrzenie@troton.com.pl

We ensure:

- Confidentiality of reports
- Protection of whistleblowers in accordance with applicable law
- Reliable investigation procedures
- No retaliation against good-faith reporters

VI. IMPLEMENTATION AND ACCEPTANCE

All TROTON Sp. z o.o. Suppliers are required to:

1. Familiarize themselves with this Supplier Code of Conduct
2. Apply its principles in daily operations
3. [Confirm acceptance of the Code](#)
4. [Provide written confirmation: DECLARATION ON CONFLICT-AFFECTED AREAS \(CAHRAs\) \(Annex\)](#)
5. Disseminate the Code among employees and subcontractors

VII. SUMMARY

The implementation of this Supplier Code of Conduct aims to strengthen social, ethical, and environmental responsibility throughout the entire supply chain. We believe that joint actions with our Suppliers will allow us to build a future based on:

- ✓ Integrity and business ethics
- ✓ Respect for human rights
- ✓ Environmental protection
- ✓ Highest product quality and safety
- ✓ Transparency and cooperation
- ✓ Innovation and continuous improvement

Contact:

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Approved on 16.12.2025

PREZES
TROTON Sp. z o.o.

Jan Wolejszo



DECLARATION ON CONFLICT-AFFECTED AREAS (CAHRAs)

We hereby declare that the products, raw materials, and materials supplied by us **do not originate from conflict-affected areas or high-risk regions (CAHRAs – Conflict-Affected and High-Risk Areas)**, in accordance with OECD due diligence guidelines.

We confirm that (please mark as appropriate):

- We do not source materials from areas affected by war, sanctions, violence, or serious human rights violations,
- We have processes enabling verification of the origin of raw materials,
- We undertake to immediately inform the recipient of any change in the supply chain that may pose a risk of CAHRAs origin.

Date:

Supplier name and address:

Signature / stamp: