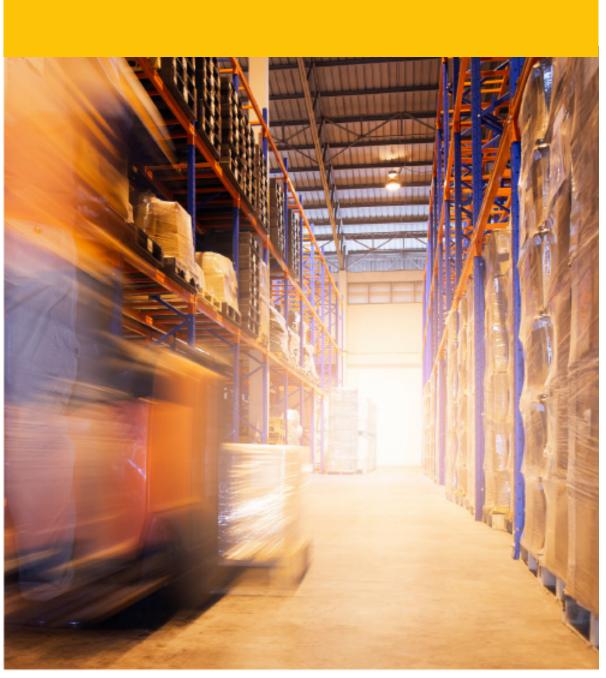
WEBCOR GROUP - March 2024

# Supplier Code of Conduct





www.webcorgroup.com



## Supplier Code of Conduct

Webcor Group maintains the highest ethical standards in its business operations and activities. Webcor Group is committed to ensuring that working conditions in Webcor's supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible.

The Webcor Supplier Code of Conduct defines minimum standards of ethical and responsible behavior that must be met by the suppliers of the products commercialized by the Group in the course of its business, in line with our corporate culture and firmly based on respect for Human and Labor Rights.

We view our suppliers as partners and expect all business partners to support, embrace, and enact the following standards of the Code. The provisions of this Code provide the minimum standards expected for all suppliers with whom the Webcor Group does business. Failure to adhere to all the provisions of the Code will have negative consequences for a supplier's relationship with the Webcor Group up to the termination of such relationship.

#### LABOR AND HUMAN RIGHTS

Respect for human rights is a fundamental part of how Webcor Group does business. Our commitment to respecting human rights acknowledges all internationally recognized human rights as outlined in the International Bill of Human Rights. That means we will seek to respect and uphold the fundamental human rights and freedoms of everyone who works with us or our business partners and of the people and communities we or our business partners work with.

Webcor is a signatory to the United Nations Global Compact (UNGC) and is committed to ensuring that, all persons, individuals, or entities, who maintain, directly or indirectly, any kind of employment, economic, social, and/or industrial relationship with Webcor, are treated fairly and with dignity.

Webcor upholds the following principles, and our suppliers must:

- **Support the protection of** internationally proclaimed **human rights**. Additionally, to identify, prevent, or mitigate any adverse human rights impacts caused or contributed to by their operations.
- **Maintain Fair Treatment:** Treat all employees with respect and provide a workplace free of harassment or abuse of any kind, inhumane treatment, discrimination, physical or mental punishment, or other forms of abuse.
- **Prohibit Child labor**: Forbid child labor. We expect our suppliers to comply with local laws regarding the minimum age of employees, and fight forced labor (including modern slavery and human trafficking) and child labor.
- Uphold Fair Wages and Working Hours: Comply with all legal requirements of working hours and minimum wages. Overtime should be voluntary. Employees shall have at least one day off for every six days of work. Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and ensure compensation of a living wage according to local living conditions.
- **Provide Decent Working Conditions:** Provide their employees with adequate working facilities that, at a minimum, shall ensure reasonable access to potable drinking water and sanitary facilities. Suppliers shall also provide their employees with a safe and healthy workplace in compliance with all applicable laws.
- **Ensure Safety of their Employees:** Protect workers from overexposure to chemical, biological, or physical hazards as well as from physically demanding tasks and conditions (such as extreme heat or cold) in the workplace. In addition, suppliers shall provide PPE (personal protective equipment) to workers.
- **Support the Freedom of Association:** Suppliers shall uphold the freedom of association and the right to collective bargaining by applicable laws. Employees shall freely allow workers to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference or harassment.



Webcor Group expects the highest standards of ethical conduct in all of our operations. Suppliers shall always be ethical in every aspect of their business, including relationships, practices, sourcing, and operations.

**Business Integrity:** The highest standards of integrity are to be upheld in all business relations. Webcor Group has a zero-tolerance policy towards bribery and corruption, our suppliers must prohibit and take all necessary steps to ensure they refrain from all forms of corruption, extortion, and embezzlement.

**Product Quality:** Suppliers involved in the supply, manufacturing, packaging, storage, and distribution of products on Webcor's behalf are committed by strictly adhering to internationally recognized management standards, namely ISO 9001 for Quality Management Systems and ISO 22000 for Food Safety Management System apart from regulatory compliances. This ensures that our products meet rigorous global benchmarks, reinforcing our commitment to excellence in quality and food safety across the supply chain.

**Transparency:** Webcor Group employees are expected to act in the best interests of the group at all times. We expect our Suppliers and Partners to support our people in ensuring that full transparency is maintained.

**Conflict of Interest:** Suppliers must avoid any activity that creates a conflict of interest or the appearance of a conflict of interest. Suppliers shall carry out their activities in an honest, upright, and transparent way and shall not offer, grant, request, or accept any gifts or donations to/from Webcor's buyers, which might violate the provisions of the Webcor Group Code of Conduct. Suppliers and Partners should not employ an individual if, during that employment, they will remain an employee of Webcor Group.

**Gi°s and Entertainment:** Suppliers can only offer or accept gifts or entertainment that are reasonable, directly related to a proper business purpose and that, in any case, do not exceed the equivalent value in local currency of USD25. Webcor's Internal policy prohibits gifts and entertainment given by or received from our employees that are considered lavish, not reasonable under the circumstances, and designed to influence decision-making. Cash or cash equivalents are not acceptable. Any gift travel and/or entertainment, (given or received) must be notified in writing to the ESG Committee/Human Resources.

**Books and Records:** Accurate and transparent books and records should be maintained at all times and demonstrate compliance with applicable laws and regulations. Suppliers must be watchful for and report internally any irregular payments, suspicious transactions, or suspected money laundering within a reasonable timeframe. Business and financial records must be legible, transparent, and reflect actual transactions and payments.



#### CONFIDENTIALITY

All suppliers shall preserve the integrity and confidentiality of the information they may receive as a consequence of their commercial relationship with Webcor and its affiliates. The obligation of confidentiality will remain once the relationship with Webcor Group is terminated, and it will include the obligation to return any material related to the company held by the supplier.

**Data privacy:** Webcor believes in protecting the privacy of personal information. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. That information must be kept secure and accessible only to those with a legitimate need to access it. Suppliers will not discuss, disclose, transfer, release, or share any confidential information or personal data concerning Webcor Group.

#### **ENVIRONMENT**

Webcor is committed to protecting the environment and minimizing its negative impact. Suppliers shall develop, implement, and maintain environmentally responsible business practices.

We expect our suppliers to:

- Protect employees' life and health, as well as the general public, against hazards associated with the products and services they provide.
- Comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations, and restrictions shall be obtained, and their operational requirements followed.
- Use resources efficiently, apply energy-efficient and environmentally friendly technologies, and reduce waste, as well as emissions to air, water, and soil.
- Operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment.

#### MONITORING

Webcor Group may conduct annual compliance surveys and audits to confirm compliance with this Supplier Code of Conduct. However, Webcor Group expects that suppliers will actively audit and monitor their day-to-day management process concerning the Webcor Group Supplier Code of Conduct and provide evidence to Webcor Group upon request.

#### ACCOUNTABILITY

Webcor Group expects that suppliers and their employees will respect this Code and strive to achieve and uphold the standards described within. Should a pattern of violation of these standards become known to the Company and not be corrected, we will take active measures which could be up, inclusive, of discontinuing the business relationship with such suppliers.

Please direct any questions or concerns about the Code to our Corporate Affairs office at: CorporateServices@webcorgroup.com This code comes into effect in March 7, 2024, and will be periodically reviewed by the Board of Advisors of Webcor Group.

We are committed to ensuring that this Code, along with any revisions, is made readily accessible to all our employees, thus promoting a shared commitment to ethical conduct and responsible business practices.



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