

**THOR**

A commitment from our **global** team...

**SUPPLIER Code of Conduct**

[www.thor.com](http://www.thor.com)

# OUR **WORLDWIDE** CODE OF CONDUCT NETWORK



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## Introduction...

Thor is a multinational manufacturer and distributor of biocides, disinfectant products, flame retardants, personal care ingredients and other speciality chemicals.

As an organisation, we are **committed to the highest standards** of corporate social responsibility, ethical principles and sustainability in everything we do.

Our **objective** is to contribute to the advancement of a sustainable society. In pursuit of this objective, we place great emphasis on forging resilient partnerships and fostering long lasting collaboration with our suppliers and contractors.

We expect everyone that we work with to have a shared **commitment** to upholding consistent standards of corporate responsibility, thereby ensuring compliance across our supply chain.

Our **Supplier Code of Conduct** is our expectation of how our supply chain joins us in our pursuit of a global sustainable society. It is our expectation of the requirements to partner with us to supply goods or services to Thor anywhere in the world.



**GIUSEPPE DE LUCIA**  
Main Board Director

“I’m proud to say that I’m part of the Thor family and I understand and uphold our Codes.”

## Our values...

### TRUST

#### We work as a team

We earn trust from our employee family, customers and business partners with our competency, integrity and ability to succeed.

### HONESTY

#### We deliver on our promises

We always operate honestly and ethically in everything we do and with everyone with whom we connect.

### OPTIMISM

#### We believe in our future

We see opportunity where others see problems and we use these opportunities in our quest for success.

### RESPECT

#### We treat everyone with dignity and respect

We believe that everyone should enjoy an environment free from discrimination and harassment.

## Environmental & Safety...

### All suppliers are expected to:

- Comply with all applicable laws and regulations relating to the environment and health and safety, ensuring that all necessary operating permits and permissions are in place and maintained.
- Ensure processes are in place to maintain the correct management of waste, emissions and discharges.
- Utilise resources efficiently, adopting energy-efficient and environmentally friendly technologies and reducing waste and emissions to air, water and soil.
- Implement management systems to ensure that products meet applicable quality and safety requirements.
- Safeguard the health and safety of employees, neighbours and the general public by addressing hazards associated with processes and products.
- Ensure the correct storage, use and transportation of all hazardous chemicals related to the organisation.
- Implement procedures that address and handle potential emergency scenarios, aiming to minimise their repercussions on individuals, assets, communities, customers and the environment.



**ENVIRONMENTAL  
AWARENESS AT ALL TIMES**

## Social...

### All suppliers are expected to:

- Guarantee the safeguarding of globally recognised human rights within their activities and for their workforce. Refrain from engaging in any form of coerced labour, encompassing modern slavery and human trafficking, either directly or indirectly, and abstain from employing child labour or utilising materials originating from such labour.
- Conform to all relevant regulations concerning wages and working hours, ensuring no discrimination in employee compensation.
- Treat all employees with dignity and respect, including zero-tolerance of any form of abuse or harassment, whether it is verbal or physical in nature.
- Promote diversity and inclusion within their organisation ensuring there is zero-tolerance of discrimination including (*but not limited to*) discrimination related to age, disability, gender reassignment and gender identity, national origin, sex or sexual orientation, marital or civil partnership status, family status including pregnancy, maternity, paternity or other carer status, race including ethnic origin, genetic information, religious, political or other beliefs, full-time or part-time status or any other trait safeguarded by relevant legislation.
- Ensure employee freedom to associate and the right to bargain collectively, to the extent permitted under applicable local law.
- Prevent illegal eviction and unauthorised acquisition of land, forests and water bodies.

THOR

SAFEGUARDING  
AWARENESS AT ALL TIMES



## Governance...

### All suppliers are expected to:

- Comply with all applicable national and international laws and standards.
- Maintain zero-tolerance relating to any form of bribery, corruption, or money laundering. Ensure that any payments, presents, or other engagements extended to clients, government officials, subcontractors, or other parties acting on your behalf adhere to the stipulations set forth in relevant anti-bribery regulations. Thor upholds the principle that Thor employees neither offer nor accept gifts or favours that might compromise or cast suspicion upon the impartiality of their decisions.
- Maintain compliance with all national and international regulations relating to applicable competition laws, regardless of jurisdiction, ensuring that there is no engagement in price fixing, bid rigging, market collusion or other anti-competitive practices.
- Ensure adherence to relevant non-proliferation, export control, sanctions, and embargo regulations.
- Ensure that there are no conflicts of interest in business relationships with Thor.
- In accordance with all national and international regulations and contractual agreements with Thor, ensure that confidentiality concerning all confidential and commercially sensitive information shared with/by Thor is maintained. At all times ensure the safeguarding of personal information received from Thor, as well as Thor's intellectual property rights, through appropriate and sufficient measures.
- Implement suitable policies, management systems, and allocate resources to ensure the responsible management of all their operations, in accordance with relevant legal obligations and the standards detailed in this **Supplier Code of Conduct**.
- Implement suitable health, safety, and environmental (*HSE*) risk management procedures that identify hazards at site/locations and effectively manage all related health, safety, and environmental risks to an acceptable level.
- Institute training initiatives to enable their managers and employees to attain a suitable level of knowledge and comprehension regarding the provisions outlined in this **Supplier Code of Conduct**, in addition to applicable laws, regulations and acknowledged standards.



## Whistleblower System...

All suppliers are expected to facilitate a mechanism for their employees and other stakeholders to raise concerns or report potential unlawful activities within their workplace.

Thor's whistleblowing system, **SpeakUP**, allows for confidential reporting of issues related to illegal or improper conduct.



If you see or suspect any conduct or business practices that are contrary to our **Supplier Code of Conduct**, you should report your concern using the following web address: <https://secure.ethicspoint.eu/domain/media/en/gui/106916/index.html>

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