

Vita Group Supply Chain Responsibility Policy

Table of Contents

1. Introduction
2. Objective
3. The Standards
 - A. Purchasing Code of Conduct
 - B. Ethical Standards
 - C. Environmental Standards
 - D. Health & Safety Standards
4. Appendix: Confirmation letter

1. Introduction

At the Vita Group (Vita) we recognise our responsibilities as an international business and we aim to encourage and sustain high standards of corporate responsibility in everything we do across our operations. This includes promoting good ethical, labour, environmental and health and safety standards in our supply chain.

Our business standards provide a framework for the relationships we have with our supply base and outline our expectations of relationships between the supply base and Vita.

We will work collaboratively with suppliers in pursuit of this policy. It is our aim to guide all our supplier relationships by the principle of continual improvement. We welcome, rather than penalise, suppliers identifying activities that fall below the standards set out in this policy (whether undertaken by themselves or sub-contractors) and who subsequently follow improvement programs.

2. Objective

The objective of this policy is to inform our suppliers of the standards that we expect them to achieve and to promote them within their own supply chains.

3. The Standards

This policy applies to suppliers of all products and services to Vita in all regions of the world, and covers the following key aspects:

- Purchasing Code of Ethics
- Ethical Standards
- Environmental Standards
- Health & Safety Standards

A: Purchasing Code of Ethics

We expect both our employees and suppliers to maintain the highest standards of honest and ethical conduct in all of our business dealings as outlined below.

1. Competitive Bids

Whenever possible, we encourage competition and seek competitive bids on goods and services to be purchased. If we ask your company for a bid, we expect the bid to be arrived at independently and without consulting other companies we may also have invited to bid. Our employees are instructed to purchase goods and services on the basis of (a) quality, (b) service and (c) price. Likewise, we expect suppliers to solicit our business on the basis of these factors.

Any attempt by a supplier to provide a personal benefit (financial or otherwise) to our employees, or to influence our employees to purchase goods or services other than on the basis of quality, service and competitive pricing is not permitted and will result in the loss of future business.

Furthermore, if any Vita employee suggests that a supplier may obtain business with our organisation in return for a personal benefit (financial or otherwise) to the employee or any other person, or if a supplier discovers that one of its employees has obtained or attempted to obtain business with our organisation in return for a personal benefit (financial or otherwise) to a Vita employee or any other person, the supplier is strongly encouraged to report the incident immediately to Vita's Legal department.

2. Conflicts of Interest

Our employees must avoid conflicts of interest and must report them when they arise. A conflict of interest may exist when, for example, an employee, directly or indirectly, has a financial interest in, receives any personal benefit from, or has a personal relationship with, a supplier. Our employees are required to disclose in writing to Vita any personal relationships with suppliers where our employee may have the ability to influence any corporate business decision regarding the suppliers.

3. Gifts and Hospitality

Our employees may not accept gifts except those of nominal value from any person or entity doing, or seeking to do, business with Vita. Nominal value refers to promotional items or events with a retail value of Euro 75 or less and given on an infrequent basis (such as a calendar, a holiday gift basket, or tickets to a vendor sponsored charity, sporting, concert or other event), and provided no obligation to render favourable treatment is incurred or expected. Any offer of a gift that exceeds the value of Euro 75 will be subject to approval by an individual's manager.

Our employees must not allow themselves to be influenced or be perceived by others to have been influenced in making a business decision as a consequence of accepting hospitality. Business trips hosted by suppliers that involve an overnight stay and that mix business and pleasure (other than dining out) must

Title: Supply Chain Responsibility Policy Date: 09/10/2019 (DD/MM/YYYY)	Version: 2.1 Status: FINAL	The controlled version is on the Vita intranet	Author: Legal Team Page 2 of 5
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be brought to the attention of the individual's immediate supervisor. Business trips that are not predominantly focused on business will not be authorised.

4. **Anti-Corruption Laws**

Vita is committed to ethical business conduct and compliance with all applicable laws, including anti-corruption laws such as the U.K. Bribery Act of 2010 (UK Act) and U.S. Foreign Corrupt Practices Act (FCPA). Violations of the UK Act and the FCPA may result in significant fines, penalties and even imprisonment. It is Vita's policy to comply with these anti-bribery laws in every aspect. Vita does not tolerate the giving or receiving of bribes under any circumstances. Each supplier has the responsibility for compliance with these anti-corruption laws within its area of authority.

5. **U.S. and European Sanctions Laws**

The United States and the European Union have enacted embargo rules that prohibit business transactions with certain specified countries or individuals that may pose threats to national security and foreign policy. As a matter of general policy, Vita is committed to comply with U.S. and European sanction laws, including U.S. sanctions on Iran, in all of its activities. Vita requires all of its suppliers to uphold this mandate at all times, and not engage in activities that do not comply with U.S. and European sanctions laws.

B: Ethical Standards

We require that people in the supply chain are treated with respect and have employment rights including rights to freely choose employment, freedom of association, working hours and pay that comply with national laws, equal opportunities (irrespective of gender, religion or belief, age, racial or ethnic origin, sexual orientation or disability), recognised employment relationships, freedom from intimidation and a safe and healthy working environment. We exercise zero tolerance towards any form of forced labour, child labour, slavery and human trafficking and we oblige our suppliers to do the same.

We will take social and environmental factors into consideration alongside financial factors in making decisions on the purchase of goods and the commissioning of services. Our purchasing decisions should where practicable consider whole life cost and the associated risks and implications for society and the environment. The same principle of fair and honest dealings must be extended to all others with whom our suppliers do business, including employees, sub-contractors and other third parties and their local communities.

When sourcing raw materials used in the production of foam, we require all our tin suppliers to ensure that the tin supplied to us are not sourced from countries with a risk of using forced/child labour. All tin suppliers are required to complete the CFSI (Conflicts Free Sourcing Initiative) Conflict Minerals Reporting Template and we only source from suppliers who confirm that tin sources are conflict-free with no forced/child labour involved.

Title: Supply Chain Responsibility Policy Date: 09/10/2019 (DD/MM/YYYY)	Version: 2.1 Status: FINAL	The controlled version is on the Vita intranet	Author: Legal Team Page 3 of 5
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C: Environmental Standards

Where practicable, we will purchase goods that have a minimal impact upon the environment, both local and global. Factors taken into consideration will include sustainability of resource production, transportation, full life energy/raw material consumption and waste production and percentage recycled content.

Wherever possible we will consume and purchase less by identifying and eradicating wasteful practices within our own operation and those operations where we have influence.

We will recycle goods at the end of their life where this is possible and where it is not possible will ensure disposal in the most environmentally sound manner.

We will purchase products and services that meet minimum environmental standards.

To promote and embed the adoption of sustainable services we will develop and support, through appropriate awareness programmes, new methodologies for identifying needs; appraising options; agreeing design and specification; supplier selection; tender evaluation; contract management and supplier development.

D: Health and Safety Standards

Vita will ensure it works with suppliers who comply with all relevant international, national and local regulations and who provide a safe and healthy working environment for their employees.

We expect suppliers to ensure their activities do not put staff and others at risk and to provide training instructions and supervision to enable staff to work safely and efficiently.

It is vital that suppliers take precautions to prevent accidents and incidents that could occur whilst working with Vita. Suppliers will be required to work in accordance with Vita's supplier and contractor policies on risk assessment, hot work and working at height.

Our expectation is that suppliers will have programmes in place for improving health and safety performance and demonstrate a commitment to continuous improvement.

Suppliers are expected to plan for implementation of their safety, health and the environment (SHE) policies, including the setting of realistic objectives and establishing prudent and supportive performance indicators.

Title: Supply Chain Responsibility Policy Date: 09/10/2019 (DD/MM/YYYY)	Version: 2.1 Status: FINAL	The controlled version is on the Vita intranet	Author: Legal Team Page 4 of 5
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4. **Appendix - Confirmation letter**

DATE

SUPPLIER NAME

SUPPLIER ADDRESS

Re: Vita Group - Supply Chain Responsibility Policy

Dear **SUPPLIER**,

Vita Cellular Foams (UK) Limited and our parent group subsidiaries trading as the Vita Group (Vita) is a world-class producer of cellular foams, liquid compounds and bonding agents. We value our working relationship with your company and would like to take this opportunity to share the key business practices and procedures covered in Vita’s Supply Chain Responsibility Policy.

It is our expectation that both our employees and our suppliers follow the same highest standards for honest and ethical conduct in all of our business dealings, as detailed in Vita’s Supply Chain Responsibility Policy.

Please notify your employees who work with Vita of this Policy. We greatly appreciate your support and cooperation.

Yours sincerely

Ian Robb
CEO Vita Group

Please acknowledge receipt of the Supply Chain Responsibility Policy and confirm that you will act in accordance with it:

Company Name:

Name:

Position:

Date:

Signature:

Title: Supply Chain Responsibility Policy Date: 09/10/2019 (DD/MM/YYYY)	Version: 2.1 Status: FINAL	The controlled version is on the Vita intranet	Author: Legal Team Page 5 of 5
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