

# SUPPLIER CODE OF CONDUCT

*Committed to sustainability...*



2023/06/01

FORT OOD

## INTRODUCTION

This Supplier Code of Conduct is intended to ensure that our suppliers, subcontractors, consultants and business associates (“Business Associates”) share and promote our ethical values and principles. We require our Business Associates to comply with all of the principles in this Supplier Code of Conduct, and they in turn promote them in their supply chain.

### 1. BUSINESS ETHICS AND ANTI-CORRUPTION

#### ➤ Compliance

FORT OOD requires its Business Partners to comply with all applicable local laws and regulations, including those of the countries in which their operations are located. Business Partners must have a formal system to establish rules and benchmarks, maintain records and take corrective action in the event of legal violations or breaches of this Code as confirmed by the Supplier’s senior management. Business Partners must be able to disclose information and performance indicators on the topics - labour, health and safety, environmental practices at any time and upon request by FORT OOD.

#### ➤ Business integrity

FORT OOD requires its Business Partners to adhere to the highest standards of ethical conduct in every aspect of their business, including relationships, practices, sourcing, activities, and not to engage in any form of corrupt practices, including but not limited to, extortion, fraud, bribery or money laundering.

#### ➤ Improper actions

FORT OOD. requires its Business Partners to avoid conduct or actions that would be a violation of applicable laws relating to corruption and bribery and more.

#### ➤ Loyal business and competition

We require our Business Partners to conduct their business activities in compliance with applicable antitrust, competition, and fair market practices laws and regulations. We also require them to comply with all applicable economic sanctions, trade laws and restrictions imposed by the EU, the UN or other national and supranational authorities or governments, including for, but not limited to, extortion, fraud, counterfeiting, bribery and money laundering. Business Partners will disclose to the Company all available information about possible conflicts of interest.

#### ➤ No undue advantage

Business partners must not offer or accept bribes or other means of obtaining undue or improper advantage.

➤ **Equal opportunities**

FORT OOD expects its Business Partners to provide equal opportunity and treatment, and not to apply any form of discrimination in hiring and employment on the basis of race, religion, gender, sexual orientation, age, physical ability, health status, political affiliation, nationality, social or ethnic origin or family status.

We expect our Business Partners to respect the local communities associated with their operations, their respective rights to land, forests and water, and any associated culture, religion and rights of local people. Business Partners must promote a healthy and safe living environment, support the creation of new jobs and the retention of jobs.

➤ **Child and forced labour**

FORT OOD requires its Business Partners to prohibit child labour. We also require them to only employ workers who meet the applicable minimum age requirement in the country in which they operate. FORT Ltd expects its Business Partners to reject any form of forced or compulsory labour

➤ **Harrasment**

We require our Business Partners to treat their employees with dignity and respect and not to discriminate against them.

➤ **Work Safety**

Our business partners will ensure a healthy, safe and secure working environment for their employees. Our Business Partners are required to comply with all applicable health and safety laws and regulation and to implement, where necessary, corrective action plans to minimize risks, provide necessary medical treatment where possible and at the discretion of the employe

➤ **Working hours, salaries and benefits**

Business Partners will comply with all applicable laws regarding working hours, wages and benefits. Overtime will be compensated at overtime rates.

➤ **Conflict raw materials and materials**

FORT OOD expects its Business Partners to take measures to ensure that no raw materials are used (produced or supplied) that are considered to originate from conflict-affected and high-risk areas. Upon request, Business Partners must provide information on the country of origin of these materials.

Any direct or indirect association with and support for public or private security forces and/or organization(s) operating illegally in the mining, extractive, transportation or other related downstream activities is cause for immediate termination of the business relationship.

### 3. ENVIRONMENTAL PROTECTION

#### ➤ Licences and permits

Business Partners are required to have all necessary environmental permits, approvals and registrations and to follow the activity and reporting requirements of these permits.

#### ➤ Pollution prevention, resource consumption and waste management

FORT OOD expects its Business Partners to make continuous improvements in terms of environmental emissions as well as energy and resource management. Suppliers must implement and demonstrate measures taken to prevent pollution and minimise waste generated, wastewater and air emissions.

#### ➤ Greenhouse gas emissions and energy consumption

Business partners should seek cost-effective methods to improve their energy efficiency and minimise energy consumption, including greenhouse gas emissions. Business Partners are expected to promote decarbonisation initiatives, reducing their direct and indirect CO<sub>2</sub> emissions through the use of renewable energy sources and the use of secondary materials and CO<sub>2</sub> offsets. Companies expect transparency regarding their emissions as well as those of their suppliers.

#### ➤ Product content restrictions

We expect our Business Partners to comply with all applicable laws and regulations regarding the prohibition or restriction of specific substances, including the placement of recycling and disposal labels, e.g. REACH Regulation, RoHS restrictions, CE marking, etc.

#### ➤ Biodiversity conservation

Business partners are expected to protect and support activities to conserve natural ecosystems, forests and animals.

### 4. PERSONAL DATA PROTECTION

We require business partners to respect the protection of personal data and to take appropriate measures in accordance with the provisions of the General Data Protection Regulation 679/2016 of the European Union and the Bulgarian Personal Data Protection Act. In order to align with international standards and best practices, Business Partners must implement strict procedures for the protection of personal data in their operations.

Business Partners are required to respect intellectual property rights, including those of our Company and our affiliates, and to have appropriate measures in place to protect all confidential information provided.

## 5. REPORTING

All business partners have the right and obligation to bring to our company's attention circumstances indicating potentially illegal conduct. Whistleblowers and complaints may be submitted anonymously, in accordance with the established whistleblowing mechanism, to the following e-mail address: [fort@fortbg.com](mailto:fort@fortbg.com).

Any report will be investigated thoroughly and discreetly by senior managers when a critical indication arises. All cases will be assessed in an independent and transparent manner, ensuring impartiality. Business Partners are also encouraged to provide all stakeholders with access to a mechanism(s) for raising concerns relating to breaches of (or suspected breaches of) any part of the Code of Conduct. All whistleblowing employees must be protected from any form of retaliation.

Plovdiv, Bulgaria

2023/07/01

Executive Manager: Todor Chakov

### **Validity of the Supplier Code of Conduct**

FORT OOD reserves the right to reasonably modify the requirements of this Supplier Code of Conduct in the event of changes in the internal and external environment. In such cases, FORT OOD will inform its Business Partners and expect them to accept such reasonable changes.