



Spadel Sustainable Procurement Policy

Introduction

Spadel delivers high quality products and its business conduct reflects its values and commitments, guided by integrity and honesty.

Convinced that only shared values conduct to strong and lasting business relationships, we expect our suppliers to help us fulfill our commitments by reflecting our principles in their own business practice.

To clarify our expectations, this Sustainable Procurement Policy outlines the most relevant principles, applicable to our suppliers as well as to ourselves. It establishes non – negotiable minimum standards we ask our suppliers, their employees, agents and subcontractors to respect and to adhere to when conducting business. It is the supplier's responsibility to educate its employees, agents and subcontractors accordingly.

Spadel further encourages its suppliers to be compliant to internationally recognized standards on business conduct, human rights and environment in line with this Policy.

Spadel will assist its suppliers in developing means to improve, verify and enable compliance to this Policy.

Spadel encourages its suppliers to conduct self-assessments against this Policy, to fully cooperate in the evaluation of the performances, and to take corrective actions when necessary.

Though being aware the legal, economical and social environment of its business partners can vary and be different of its own, Spadel reserves the right to terminate any agreement with a supplier that does not demonstrate its genuine commitment and does not implement the necessary measures to achieve compliance with these requirements.

This Sustainable Procurement Policy plays an essential role in Source of Change, Spadel's sustainability strategy. A detailed presentation is available at www.sourceofchange.spadel.com

Principle 1 : ETHICAL COMMITMENT IN CONDUCTING BUSINESS

Spadel's relationships with its business partners are characterized by honesty, integrity, ethics and fairness, in an open and fair competitive business environment.

compliance to law - Spadel and its suppliers will adhere to **all applicable** local, national, and supra-national laws and regulations. In countries, or in specific situations, where there is no law or regulation governing a particular activity or operation, Spadel expects its suppliers to conduct their operations consistent with the principles of this Policy.

improper advantage - Spadel will never, in any activity, directly or through intermediaries, offer, promise or make any understandings about, any personal or improper advantage in order to obtain or retain a business or other advantage from a third party, whether public or private.

conflicts of interests - In the course of making business decisions or carrying out their job responsibilities, Spadel employees shall avoid conflicts of interests between personal interests and the interests of the business and its business objectives.

fair competition - Spadel is committed to the principles of lawful and free competition based on the merits of our products and services.

Food Fraud – Spadel complies to the implementation of the « Food Fraud Prevention » policies of BRC. Each year, Spadel conducts a Food Fraud Vulnerability Assessment and mitigation /prevention plan.

We expect our suppliers to conduct business conform to the same standards, by implementing policies and procedures to achieve this goal.

Principle 2 : ENVIRONMENTAL COMMITMENT

Spadel is involved in a continuous improvement process to minimize its environmental impact at all business levels.

Spadel is continuously reviewing its environmental policies to ensure alignment with the highest standards of protection of the natural environment and to integrate environmental management into operational and training systems.

Spadel is expecting a fruitful cooperation with its suppliers to share best practices, to achieve and measure the common targets.

In the following areas, Spadel expects from its suppliers a similar emphasis on :

energy : measuring and trying to reduce the use of energy both in manufacturing and in distribution,

water : measuring and reducing use and discharge of water,

waste : measuring and reducing the production of waste,

CO2 : reducing the carbon footprint of the products and services over their lifecycle.

biodiversity: measuring and reducing the impact of its activities on biodiversity

Principle 3 : SOCIAL COMMITMENT towards its employees

Spadel is committed to providing a workplace built on trust, honesty and fair treatment. A successful and sustainable business requires a workforce that is given opportunities and incentives to develop professionally and to succeed.

Spadel expects its suppliers to commit to the following principles:

Child Labor is not allowed under any circumstances.

According to the International Labour Organization, a child is defined as any person less than 15 years of age, unless local minimum wage law stipulates a higher age for work or for the continuation of mandatory schooling, in which case the higher age would apply. Allowable exceptions in case national laws permit the employment of children aged 13 to 15 (or 12 to 14 for light work) provided the job is not harmful to their health and development, does not interfere with attendance at school or vocation programs, and is not detrimental to their ability to learn.

All employment relationships are of voluntary nature.

Use of forced or prison labor and/or indentured or bonded labor is not allowed under any circumstances.

Workers have the right to join trade unions or other organizations of their choice, and to bargain collectively in accordance with local laws.

Discrimination is not permitted on the basis of race, religion, gender, sexual orientation, age political opinion, national extraction, social origin, or of being part of a trade union or other organization.

Workers will only be evaluated on basis of their skills, abilities and performances at work. This concerns all decisions made with regard to hiring and employment, to the distributing of compensations, benefits, promotions, training and development, discipline, to the termination of an employment relationship.

Wages and working hours shall reflect the minimum applicable legal norms.

Any worker shall receive at least one day of rest during a seven-day working period, in accordance to local law.

Workers shall not be subjected to physical, verbal, sexual or psychological harassment in the workplace.

Workers have a right on safe and healthy working conditions, on a safe and healthy workplace.

Spadel has an extensive safety and health policy applicable to anyone entering the workplace, and any infringement on this policy is severely punished.

Spadel expects its suppliers to implement same high safety and health standards, according to local regulations.

However, should the local regulations not meet minimum standards, then international standards should be used.

Additionally, should be provided for:

- protective equipment for the workers in accordance with their job requirements and safe working conditions;
- safety procedures and training programs, to ensure workers are aware of the hazards;
- assessment, identification, control of potential hazards and risks associated with equipments and processes;
- monitoring and analysis of all accidents, and the keeping of accurate and timely records of accidents and injuries.