DAYCO SUPPLIER CODE OF CONDUCT

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1. INTRODUCTION

1.1 Purpose of the Supplier Code of Conduct

The **Dayco Supplier Code of Conduct** sets forth clear expectations and standards for all suppliers collaborating with our Group. Our goal is to foster ethical, social, and environmental responsibility throughout the entire supply chain, contributing to sustainable development.

This document aims to deepen our partnerships by actively involving our business partners in an evolving landscape where professionalism and the highest quality standards are integrated with responsible sourcing practices, addressing both environmental stewardship and social accountability.

We firmly believe that by working together with suppliers who share our values, we can create shared value and positive impact. This Code builds upon the principles established in the **Dayco Code of Conduct** and **Human Rights Policy**, defining a shared approach to address the unique challenges and complexities of supply chains.

Ultimately, our objective is to strengthen ties with partners who share these principles and to encourage the adoption of responsible practices throughout their own operations and supply network

1.2 Scope of Application

This Code applies to all suppliers, subcontractors, and business partners who provide goods or services to Dayco Group, regardless of their location or size. These principles have to be respected when doing business with us, and suppliers are expected to promote them across their own supply chains.

1.3 Reference Frameworks

Dayco operates within a highly complex and multinational business environment, where variations may arise concerning applicable regulations, key supply chain issues, or relevant standards to be followed. Despite these differences, we want to contribute to a fair and just world through our business partnerships —one that safeguards the environment, upholds human rights, and promotes transparency.

Our approach takes guidance from internationally recognized standards, including:

- The ILO Declaration on Fundamental Principles and Rights at Work and relevant conventions
- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The OECD Guidelines for Multinational Enterprises
- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas

To support our vision, we have implemented dedicated initiatives, including supplier selection process that requires our partners to disclose their sustainability practices, including any ESG-related certifications (such as ISO 14001).

We conduct our activities in alignment with the applicable laws and regulations of the countries in which we operate. In situations where conflicts arise between local legal requirements and our internal standards or human rights protection, we will seek to identify and implement alternative solutions that safeguard, in compliance with local legal requirements, human rights and environmental stewardship across both our direct operations and broader value chain.

2. SETTING OUR EXPECTATIONS: SOCIAL STANDARDS

2.1 FREEDOM FROM FORCED LABOUR, SLAVERY AND FREEDOM OF MOVEMENT

Suppliers should adopt a **zero-tolerance policy** towards all forms of **modern slavery and forced labour**, to align to Dayco guiding principles.

Suppliers are expected to **prohibit the use of forced, bonded, trafficked, or compulsory labour**. The right to withdraw from any employment relationship should be recognized to all individuals and safeguarded, through the adoption of adequate management systems (i.e., policies).

All workers across the value chain should enjoy **freedom of movement: no personal identification documents, including passports or work permits,** should be **withheld or confiscated** at any time, whether within their own operations or in those of their subcontractors and business partners.

2.2 CHILDHOOD PROTECTION

Suppliers are expected to implement appropriate measures to **prevent any occurrence of child labour** within their operations and to **ensure the protection of children's rights**, in line with **applicable international standards** and relevant **national laws** in the countries where they operate.

2.3 FOSTERING DIVERSITY AND INCLUSION THROUGH JUST AND HARASSMENT-FREE WORKING ENVIRONMENTS

Suppliers should ensure **just treatment for all individuals** within their operations, **prohibiting any form of discrimination**, including but not limited to discrimination based on race, color, religion, national origin, ethnicity, sexual orientation, gender, marital status, age, physical or mental disability, veteran status or any other legally protected status. .

Suppliers are also expected to **prohibit all forms of harassment**, including physical, verbal, sexual, or psychological abuse. A **zero-tolerance approach to any inappropriate or disrespectful behavior** is to be implemented and enforced in the workplace.

2.4 RIGHT TO FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers should respect the **right of all workers to freely associate**, organize, and join trade unions or other representative bodies of their choice, in accordance with applicable local laws.

2.5 FAIR WORKING CONDITIONS AND ADEQUATE REMUNERATION

Suppliers should ensure **fair and equitable working conditions** for all workers by consistently promoting **transparency** in the workplace.

Suppliers are also expected to uphold the principle of **"equal pay for equal work,"** ensuring that no differences in salary occur based on **sex, race, ethnicity, sexual orientation, religion**, or any other characteristic.

2.6 OCCUPATIONAL HEALTH AND SAFETY

Suppliers should prioritize the health and safety of their employees by ensuring full compliance with all relevant local laws and international standards.

To achieve this, suppliers may work towards establishing and maintaining **effective health and safety management systems**, and may provide regular training to all personnel working on their premises, and identify hazards and opportunities for continuous improvement.

2.7 RIGHT TO PRIVACY AND DATA PROTECTION

Suppliers should comply with **data security requirements**, particularly those concerning the **personal data**, including **sensitive information** and other **critical business information**. The activity is to be carried out in accordance with relevant local regulations.

2.8 RELATIONSHIP WITH LOCAL COMMUNITIES: STEWARDSHIP OF LAND RIGHTS

Suppliers should **respect the land rights of local communities**, and, where applicable, those of **indigenous peoples**.

Suppliers are encouraged to foster **constructive relationships** and to work to **minimize adverse impacts** on local communities, supporting sustainable development and contributing to the **protection of community rights and well-being.**

2.9 CONFLICT MINERALS

When sourcing raw materials, semi-finished, or finished products, Dayco focuses on adopting **responsible sourcing practices** that do not, whether directly or indirectly, compromise the **protection of human rights** across its entire value chain.

Where products supplied to Dayco Group contain conflict minerals, suppliers are expected to comply with applicable legal requirements related to sourcing from conflict-affected and high-risk areas

In alignment with relevant regulation and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, business partners are expected to implement appropriate supply chain due diligence processes and, upon request, provide Dayco with the latest available reporting templates issued by the Responsible Minerals Initiatives.

3. SETTING OUR EXPECTATIONS: ENVIRONMENTAL STANDARDS

3.1 ENVIRONMENTAL STEWARDSHIP

To reduce the environmental impact of Dayco's supply chain, suppliers are encouraged to adopt environmentally responsible practices in their operations. These may include improving energy efficiency, reducing greenhouse gas emissions, monitoring and reducing air, soil and water pollutants, managing hazardous substances, supporting biodiversity protection, and promoting circular economy principles

To do so, we encourage our suppliers to progressively align their environmental management systems to recognized certification standards such as **ISO 14001**, **EMAS**, or other equivalent frameworks, as well as comply with all applicable local environmental regulations.

3.2 CLIMATE CHANGE AND ENERGY EFFICIENCY

Suppliers are encouraged to support **Dayco**'s efforts to reducing greenhouse gas (GHG) emissions and environmental impacts by adopting environmentally-responsible approaches to production activities, including increased reliance on renewable energy sources.

3.3 REDUCING AIR, WATER AND SOIL POLLUTION AND SAFE HANDLING OF SUBSTANCES OF VERY HIGH CONCERN.

Suppliers should take action for preventing, reducing and controlling pollution that may be caused from day to day operations, with regards to potential soil contamination, water discharges or air pollution. Suppliers must **identify and manage hazardous substances and substances of very high concern (SVHCs)** in accordance with all applicable **national and international regulations**

Proper management of industrial wastewater is essential to prevent contamination and protect water quality. Same principle applies to soil and air emissions. Transparent communication regarding the presence of hazardous or SVHCs in products must be ensured, in line with relevant legal requirements

Operations are to be conducted in compliance with national and international regulations, such as – but not limited to - REACH, RHOS. Other regulations may apply in countries where each supplier operates: compliance is required.

3.4 RESPONSIBLE MANAGEMENT OF WATER

Suppliers are encouraged to adopt responsible water management practices to improve **efficiency in water use**, and ensure the **safe treatment and discharge of wastewater** in full compliance with applicable regulations. Special attention should be paid when operating in areas at risk of water stress.

3.5 BIODIVERSITY PROTECTION, RESPONSIBLE LAND-USE AND NO DEFORESTATION

Suppliers are expected to carry out their operations in a way that minimizes negative impacts on biodiversity, natural ecosystems, and land resources, and to avoid contributing to deforestation or unsustainable land use.

Where relevant regulatory or market expectations apply, suppliers should be able to demonstrate that appropriate processes or controls are in place to support responsible land use and to address risks related to deforestation, land conversion, or exploitation of natural resources

3.6 CIRCULAR ECONOMY AND RESOURCE USE

When managing waste, suppliers are expected to comply with applicable local regulations and are encouraged to align with internationally recognized standards and best practices, such as ISO 14001 and EMAS.

Suppliers are also encouraged to continuously improve their production processes by identifying opportunities to reduce reliance on virgin materials and, where feasible, incorporating recycled materials into their products. These efforts contribute to minimizing waste and promoting more sustainable resource management.

4. SETTING OUR EXPECTATIONS: GOVERNANCE STANDARDS

4.1. ETHICS AND BUSINESS INTEGRITY

Suppliers are expected to conduct all business activities with **integrity, fairness, and accountability**, consistently upholding the **highest ethical standards** and operating in alignment with the principles outlined in Dayco's Code of Conduct.

4.2. ANTI-CORRUPTION PREVENTION

Suppliers are expected to comply with all applicable international anti-bribery and anti-corruption laws and regulations. This includes conducting business in a transparent and responsible manner and avoiding any form of unethical practices.

4.3 TRACEABILITY AND TRANSPARENCY

Suppliers are encouraged to identify relevant actors within their upstream value chains and to collect and maintain key information related to sourcing and supply chain structure, in line with applicable legal and regulatory requirements.

4.4. COMPLIANCE WITH REGULATIONS: EXPORT CONTROLS AND ECONOMIC SANCTIONS

Suppliers are expected to comply with all applicable laws and regulations relating to international trade, including export controls, import requirements, and economic sanctions.

Suppliers should ensure that appropriate measures are in place to manage risks associated with cross-border transactions and, where relevant, carry out reasonable checks to avoid engaging in activities that do not comply with applicable national and international regulations, including transactions involving sanctioned countries, entities, or individuals.

5. IMPLEMENTATION AND GOVERNANCE

We monitor the implementation of our Supplier Code of Conduct with close attention, integrating these requirements in our supplier relationship management system.

The Board of Directors is responsible for our group Strategy, organization and oversight of the dissemination of DAYCO Human Rights Policy, DAYCO Code of Conduct and Supplier Code of Conduct principles in our day-to-day operations and across value chains.

We engage with our stakeholders and we report regularly to senior leadership on relevant updates.

To effectively respond to the widespread and complex nature of global supply chains, we focus on tackling underlying causes through active collaboration and meaningful partnerships.

6. ACCESS TO REPORTING CHANNELS IN CASE OF POTENTIAL BREACHES OF SUPPLIER CODE OF CONDUCT PRINCIPLES

At Dayco, we encourage our employees and other stakeholders to voice concerns regarding any violation of the principles included in our Code of Conduct, Human Rights Policy or Supplier Code of Conduct. Therefore, we have identified different ways of raising concerns, through:

- Direct engagement of employees' own supervisors
- Direct engagement of employees' representatives at Human Resources departments
- Contacting Dayco Legal Department
- Writing a letter to the Audit Committee of the Dayco Board of Directors
- Calling the Dayco Compliance Hotline
- Logging on to the Dayco Compliance website at Dayco.Ethicspoint.com

The Dayco Compliance Hotline is maintained by a third-party confidential reporting company and is available 24 hours a day, 7 days a week. This company will forward your concerns to Dayco for investigation and follow-up. Keep in mind, if you make a report using the hotline, your identity will be kept confidential, to the greatest extent possible. It is helpful when you identify yourself as it enables us to investigate more thoroughly and to follow-up appropriately[1].

Those channels are open to any stakeholder, both internal and external, who believes that a violation has occurred.

Should this Policy be violated, we will take appropriate measures proportionate to the seriousness of the incident, in accordance with applicable laws, regulations, contractual obligations, and disciplinary procedures.

7. SUPPLIER CODE OF CONDUCT DISSEMINATION

DAYCO Supplier Code of Conduct has been formally approved by the Executive Leadership Team.

All suppliers are required to acknowledge this document upon its publication on the Group website; in addition, all of our suppliers will be provided with a copy of Dayco Supplier Code of Conduct, which they will be asked to sign as an integral component of their business contract, integrating principles laid down in the Dayco Human Rights Policy and Code of Conduct.

Through these instruments, we support a responsible approach to supply chain management, aimed at preventing and promptly addressing any potential human rights violations.

In case of any violations of the principles laid out in this document, Dayco will take appropriate measures to manage the issues that arise.

[1] For contact details, please refer to page 61 of Dayco Code of Conduct

Appendix A – Glossary

Audit Committee
A sub-committee of the Board of Directors responsible for overseeing financial reporting, compliance, and internal controls, including investigations into reported breaches.

Business Partner
Any external organization, entity, or individual that conducts business with Dayco Group, including suppliers, subcontractors, and service providers.

Child Labour
Employment of individuals under the minimum legal working age as defined by ILO Conventions and national laws. The minimum age is generally 15 years.

Circular Economy
An economic model focused on minimizing waste and maximizing resource efficiency through recycling, reuse, and sustainable design.

Collective Bargaining
The process by which workers, through trade unions or representatives, negotiate employment terms (wages, working hours, etc.) with employers.

Conflict Minerals
Minerals (such as tin, tungsten, tantalum, and gold) sourced from areas affected by armed conflict or human rights abuses, as defined by OECD guidance.

Due Diligence
A systematic process of identifying, preventing, and mitigating potential negative impacts on human rights, the environment, and governance within business operations and supply chains.

Equal Pay for Equal Work
The principle that all employees performing the same or substantially similar work should receive equal compensation, regardless of gender or other protected characteristics.

ESG (Environmental, Social, and Governance)
A framework used to evaluate a company's sustainability performance and ethical impact.

Fair Working Conditions
Employment standards ensuring lawful working hours, safe conditions, adequate pay, and respect for workers' rights and dignity.

Forced Labour
Any work or service performed involuntarily under threat, coercion, or penalty, in violation of ILO Convention No. 29.

Freedom of Association
The right of workers to join or form organizations or unions of their choice to represent their interests.

GHG Emissions (Greenhouse Gas Emissions)
Gases released into the atmosphere that contribute to climate change; typically measured and reported in accordance with standards like the GHG Protocol or ISO 14064.

Hazardous Substances
Chemicals or materials posing risks to health, safety, or the environment if improperly handled or disposed of.

Human Rights Policy
The internal document defining Dayco Group's approach to respecting human rights across all operations and business relationships.

ILO (International Labour Organization)
A UN agency that sets international labour standards, including conventions on child labour, forced labour, and discrimination.

ISO 14001
An international standard for environmental management systems aimed at reducing environmental impacts and ensuring compliance with regulations.

Modern Slavery
Umbrella term covering all forms of exploitation including forced labour, human trafficking, debt bondage, and servitude.

Occupational Health and Safety (OHS)
Policies and systems designed to ensure a safe and healthy working environment for all employees.

REACH / RoHS
EU regulations concerning the registration and restriction of hazardous substances in manufacturing and product design.

Responsible Sourcing
The practice of procuring goods and services in a way that considers environmental, social, and ethical factors throughout the supply chain.

Stakeholder
Any individual or group affected by or capable of influencing Dayco Group's operations (e.g., employees, suppliers, customers, communities, regulators).

Subcontractor
A third-party entity engaged by a supplier to perform work or provide services within the supply chain.

Supplier Code of Conduct
The document outlining Dayco Group's ethical, environmental, and social expectations for all suppliers and business partners.

Sustainable Development
Development that meets present needs without compromising the ability of future generations to meet theirs, balancing economic, environmental, and social dimensions.

SVHCs (Substances of Very High Concern)
Chemicals identified under REACH as having serious effects on human health or the environment (e.g., carcinogenic, mutagenic, or toxic substances).

Traceability
The ability to track the origin, history, and movement of materials or products through all stages of the supply chain.

Transparency
The practice of openly disclosing relevant and accurate information to stakeholders about policies, practices, and performance.

Value Chain
All activities and processes involved in creating and delivering a product or service, from raw material sourcing to end use.

Whistleblowing / Compliance Hotline
A confidential reporting mechanism allowing employees or stakeholders to report suspected breaches or unethical behaviour without fear of retaliation.