

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, ensuring that every business activity aligns with our core values and supports 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 specific criteria tailored to the unique challenges and complexities of supply chains.

Ultimately, our objective is to strengthen ties with partners committed to 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. Compliance with this Code is a mandatory requirement for doing business with us, and suppliers are expected to uphold its principles throughout their own supply chains.

1.3 Reference Frameworks

Dayco Group 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, our fundamental commitment remains steadfast: to ensure that through our business partnerships, we actively contribute to creating a fair and just world—one that safeguards the environment, upholds human rights, and promotes transparency.

Our commitments are rooted in 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 these commitments, we have implemented multiple initiatives, including a rigorous supplier selection process that requires our partners to disclose their sustainability practices, including any ESG-related certifications (such as ISO 14001).

We operate in full compliance with the laws and regulations of the countries in which we operate. In cases where local legal requirements are in conflict with our internal guidelines on Sustainable Supply Chain Management, we will work to identify and implement alternative solutions that uphold our principles—prioritizing the protection of the environment and the rights and well-being of all stakeholders affected by our supply chain.

2. SETTING OUR EXPECTATIONS: SOCIAL STANDARDS

2.1 FREEDOM FROM FORCED LABOUR, SLAVERY AND FREEDOM OF MOVEMENT

Suppliers are required to maintain a **zero-tolerance policy** towards all forms of **modern slavery and forced labour**, to align to Dayco building principles.

Suppliers shall strictly **prohibit the use of forced, bonded, trafficked, or compulsory labour**, in line with the **ILO Conventions** (such as ILO Conventions No. 29) and the **Universal Declaration of Human Rights**. To ensure that the right to withdraw from any employment relationship is recognized to all individuals, suppliers must implement **appropriate policies, controls** to ensure that this principle is respected within their operations or throughout their supply chains

All workers across the value chain must enjoy **freedom of movement**. Suppliers shall take the necessary steps to ensure that **no personal identification documents, including passports or work permits, are withheld or confiscated** at any time, whether within their own operations or in those of their subcontractors and business partners.

2.2 CHILDOOD PROTECTION

Suppliers shall implement appropriate measures and controls to **prevent any occurrence of child labour** within their operations and to **ensure the protection of children's rights**, in line with **applicable international conventions**, including **ILO Conventions on Minimum Age for Admission to Employment**, as well as relevant **national laws** in the countries where they operate.

Under no circumstances shall any individual **under the age of 15** be employed.

If individuals **between the ages of 15 and 18** are engaged, suppliers must ensure that:

- Their work does **not interfere with compulsory education**;
- They are **not exposed** to any **conditions** that could **pose physical, mental, moral, or safety risks**;
- They are not **required to perform night shifts or overtime work**

2.3 FOSTERING DIVERSITY AND INCLUSION THROUGH EQUAL OPPORTUNITIES AND HARASSMENT-FREE ENVIRONMENTS

Suppliers shall ensure **equal treatment for all individuals** within their operations and shall **prohibit any form of discrimination**, including but not limited to discrimination based on gender, age, nationality, ethnicity, religion, sexual orientation, disability, political opinion, or any other legally protected characteristic.

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

To this end, suppliers are expected to adopt appropriate policies and measures to **promote and safeguard diversity, equity, and inclusion** within their workforce and across their business relationships. Suppliers shall ensure the **protection of the rights and dignity of every individual**.

All actions must align with **international best practices**, including the principles set out in the **ILO Conventions on Discrimination, Employment and Occupation**.

2.4 RIGHT TO FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers shall respect and uphold 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 and international standards, including the **ILO Conventions**. Furthermore, Supplier shall also guarantee the **right to collective bargaining** and must ensure that workers can engage in such activities **without fear of retaliation**.

In situations where local laws impose restrictions on freedom of association or collective bargaining, suppliers are expected to comply with **applicable local regulations** while ensuring that **workers have access to alternative forms of open dialogue and representation**, so that their **voices are heard** and their **rights are respected and protected**.

2.5 FAIR WORKING CONDITIONS AND ADEQUATE REMUNERATION

Suppliers shall ensure **fair and equitable working conditions** for all workers by consistently promoting **transparency** in the workplace. This includes the implementation of appropriate practices and systems to provide **clear, fair, and transparent employment terms**, in line with applicable laws and standards. Furthermore, transparency shall be provided with regards to stages of working life, which should be driven by the criterion of skills, experience and professional potential and the results.

Such terms must cover **legally compliant working hours, rest periods, and paid leave**.

Wages must meet **legal minimum requirements**, and be paid **regularly, on time, and in full**, with no unlawful deductions.

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 protected characteristic.

2.6 OCCUPATIONAL HEALTH AND SAFETY

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

To achieve this, suppliers must establish and maintain effective health and safety management systems, provide regular training to all personnel working on their premises, and conduct ongoing monitoring and risk assessments to identify hazards and opportunities for continuous improvement.

2.7 RIGHT TO PRIVACY AND DATA PROTECTION

Suppliers are required to fully comply with **data security requirements**, particularly those concerning the **personal data**, including **sensitive information** and other **critical business information**.

The activity shall be carried out in accordance with relevant local regulations.

2.8 RELATIONSHIP WITH LOCAL COMMUNITIES: STEWARDSHIP OF LAND RIGHTS

Suppliers shall **respect the land rights of local communities**, and, where applicable, those of **indigenous peoples**. When operating directly or through third parties, suppliers are expected to carry out **legality checks** to identify any **non-compliance or violations** related to land ownership or usage rights.

Suppliers are encouraged to **recognize and respect the cultural, social, and economic connection** that local communities have with their land. In this context, it is highly recommended that suppliers engage in **open, transparent, and respectful dialogue** with affected communities, in line with the principle of **Free, Prior and Informed Consent (FPIC)**. This engagement should take place **before initiating any activity** that may impact the land, livelihoods, or environment of local populations.

By fostering **constructive relationships** and working to **minimize adverse impacts**, suppliers support sustainable development and contribute to the **protection of community rights and well-being**

2.9 CONFLICT MINERALS

When sourcing raw materials, semi-finished, or finished products, Dayco is committed to adopting **responsible sourcing practices** that do not, whether directly or indirectly, compromise the **protection of human rights**. Given the complexity of its supply chains, the active involvement of business partners is essential in upholding this commitment.

Suppliers are therefore required to implement **robust verification processes** across their own supply chains, particularly for materials classified as “**conflict minerals**”, and to **share relevant information with Dayco** in a timely and transparent manner.

In parallel, Dayco will carry out appropriate procedures to **verify the accuracy of the information received**, ensuring that its products are **not associated with the financing of armed groups**, nor with incidents of **forced labor, child labor**, or any other **human rights violations**

3. SETTING OUR EXPECTATION: ENVIRONMENTAL STANDARDS

3.1 ENVIRONMENTAL STEWARDSHIP

To reduce the environmental impact of Dayco’s supply chain, suppliers are expected to progressively align their environmental management systems with recognized certification standards such as **ISO 14001, EMAS**, or other equivalent frameworks, as well as comply with all applicable local environmental regulations.

Full certification is highly encouraged, particularly for suppliers engaged in manufacturing activities, as it constitutes a key step towards demonstrating a strong commitment to environmental protection and continuous improvement.

3.2 CLIMATE CHANGE AND ENERGY EFFICIENCY

Suppliers shall actively support **Dayco’s** commitment to reducing greenhouse gas (GHG) emissions throughout the entire value chain. To this end, suppliers are expected to:

- Continuously monitor and track energy consumption within their facilities;
- Wherever feasible, implement energy-efficient technologies and practices, while promoting the increased use of renewable energy sources.

Furthermore, suppliers are encouraged to measure and report both direct and indirect GHG emissions associated with their operations (in accordance with internationally recognized standards, such as GHG Protocol, ISO 14064 or 14067) to fully understand their environmental impact and progressively implement tailored actions to reduce it

3.3 REDUCING AIR, WATER AND SOIL POLLUTION

Suppliers shall 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.

Proper management of industrial wastewater is essential to prevent contamination and protect water quality. Same principle apply to soil and air emissions.

Operations shall be conducted in compliance with national and international regulations, such as – but not limited to - REACH, RHOS. Other regulations may apply in country of each suppliers' operations: compliance is required.

Suppliers are encouraged to go beyond compliance by adopting preventive approaches, continuous monitoring, and performance improvement practices aimed at reducing their pollutant load over time.

3.4 HANDLING OF SUBSTANCES OF VERY HIGH CONCERN (SVHCS)

Suppliers must **identify and manage hazardous substances and substances of very high concern (SVHCs)** in accordance with all applicable **national and international regulations**.

Once identified, suppliers are expected to establish and implement **internal processes** to ensure the **safe handling, storage, and disposal** of such substances. Transparent communication regarding the presence of hazardous or SVHCs in products must be ensured, in line with relevant legal requirements.

Suppliers are strongly encouraged to **continuously evaluate and adopt safer alternatives**, especially in relation to SVHCs, and to **stay up to date with changes in chemical regulations** to actively reduce long-term environmental and health risks.

3.5 RESPONSIBLE MANAGEMENT OF WATER

Suppliers shall adopt responsible water management practices by **monitoring water withdrawals, improving efficiency in water use**, and ensuring the **safe treatment and discharge of wastewater**, in full compliance with applicable regulations. Application of **environmental standards** and **certification frameworks** is highly recommended (i.e., ISO14001).

In regions experiencing **water stress or scarcity**, suppliers are required to implement **targeted measures** to minimize water consumption and prevent negative impacts on local ecosystems and communities.

Suppliers are also encouraged to establish **formal processes** to assess and monitor the **water footprint** of their operations. Staying informed about and adopting **innovative solutions** to reduce withdrawals and enhance water efficiency is strongly recommended as part of a long-term sustainability approach.

3.6 CIRCULAR ECONOMY AND RESOURCE USE

Suppliers are expected to **regularly monitor and evaluate their waste generation** throughout the year, ensuring that **reporting is carried out in compliance with applicable national regulations**. Alignment with recognized best practices, and where possible, certification under standards such as **ISO 14001** or **EMAS**, is strongly encouraged.

Suppliers are recommended to embrace **circular economy principles** by prioritizing **waste prevention, reuse, and recycling**, and by ensuring the **safe and compliant disposal** of all waste types, including **hazardous waste**.

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 must comply with all applicable **international anti-bribery and anti-corruption regulations**, and are expected to actively prevent any form of corruption through the implementation of **structured internal procedures** and **regular employee training**.

4.3 TRACEABILITY AND TRANSPARENCY

Suppliers play a crucial role in ensuring that the principles outlined in this document—and in other applicable frameworks—are effectively implemented throughout their own supply chains.

As such, suppliers are required to **identify and map all relevant stakeholders operating within their upstream value chains**, and to **gather and maintain accurate information** in compliance with applicable laws and regulations.

In addition, suppliers must ensure the **traceability of the products and materials provided**, with particular attention to their **origin**. Upon request, suppliers shall provide **traceability-related data** necessary for Dayco to meet its own **regulatory obligations**.

5. IMPLEMENTATION AND GOVERNANCE

We monitor the implementation of our Supplier Code of Conduct with close attention, integrating this requirements in our supplier selection and re-assessment procedures.

The Board of Directors is responsible for our group Strategy, organization and oversight of the implementation 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. The responsibility for ensuring respect for these principles is shared across functions, with a particular focus on Purchasing department due to its position as a contact point with our suppliers.

We track progress through internal monitoring and engagement with stakeholders, and we report regularly to senior leadership, including updates to the Board of Directors. This ensures ongoing oversight and alignment with our values and international standards.

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 pledge to provide or support access to remedy in case of any violation of principles included in our Code of Conduct, Human Rights Policy or Supplier Code of Conduct occurring. 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 appropriately¹.

Those channels are open to any stakeholder, both internal or 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 is effective immediately within all of our business relationships, across our upstream value chain.

All suppliers are required to acknowledge this Policy 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 required to sign as an integral component of their business contract, integrating commitments laid down in the Dayco Human Rights Policy and Code of Conduct.

Through these instruments, we expect our suppliers to manage their own supply chains responsibly, adopting similar standards and governance models. This ensures that potential violations are proactively prevented and promptly addressed throughout the entire downstream value chain.

In case of any violations of the principles laid out in this document, Dayco will take appropriate measures to manage the issues arisen, including potential contract termination.

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

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.

Bonded Labour

A form of forced labour where an individual is required to work to repay a debt or obligation, often under unfair or coercive conditions.

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.

Free, Prior and Informed Consent (FPIC)

A right of indigenous and local communities to give or withhold consent to projects affecting their land or resources before activities begin.

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 commitment 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.