



Supplier Code of Conduct

Our human, labor rights and environmental expectations

Ontex
Here for you.

Updated version 2024

Contents



Letter from our CEO	03
Introduction	04
Purpose and Scope	05
Due Diligence Principles	07
Social, Labor and Environmental Standards	08
1. Business Ethics	09
2. Labor Conditions and Human Rights	12
3. Environmental Protection	17
4. Complaint Channels	19
5. Monitoring and Auditing	21
6. Compliance	22
Glossary	23

Letter from our CEO



We are committed to conducting our business in a transparent and responsible manner for the benefit of our business continuity, the wider community and the protection of our stakeholders. Our Supplier Code of Conduct helps us to communicate these principles to all our suppliers, enabling us to make meaningful decisions together in our daily operations. As an Ontex supplier and business partner, **we expect you to comply with this document and uphold the spirit of our corporate values.**

By embracing and upholding the values and commitments set forth in this Supplier Code of Conduct, we can foster a collaborative environment where success can be achieved. In doing so, we will work toward our vision of promoting and improving human and labor rights and environmental protection in our own operations and throughout our value chain.

Gustavo Calvo Paz
CEO
July 29, 2024



Introduction

Ontex is a leading international personal care company specializing in high-quality products for baby, feminine, and adult care.

As a preferred partner for consumers, retailers, and healthcare providers worldwide, we are committed to continuously improving and promoting human rights, fair labor conditions, business integrity, and environmental stewardship in all our interactions and throughout Ontex global value chain.



Purpose and Scope

The Ontex Supplier Code of Conduct sets out minimum commitments and expectations for responsible business conduct from our suppliers, in accordance with international frameworks on human and labor rights, regulations and national laws.



Guidance and Legal Framework

- United Nations (UN) Universal Declaration of Human Rights (1948)
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work (ILO) (2017)
- UN Guiding Principles on Business and Human Rights (2011)
- OECD Guidelines for Multinational Enterprises (2011)
- OECD Due Diligence Guidance for Responsible Business Conduct (2018)

The Ontex Supplier Code of Conduct applies to all suppliers, including contractors and agents, involved in our dynamic value chain. This code covers anyone carrying out business on our behalf or in our name.

Participants in the Ontex value chain are expected to acknowledge and commit to the following responsible business principles:



Compliance with Laws and Regulations

Adhere to all applicable local, national, and international laws and regulations.

Ethical Business Practices

Conduct business ethically, avoiding any form of corruption, bribery, or fraud.

Human Rights and Labor Practices

Respect and uphold human rights, ensuring fair labor practices, non-discrimination, and the prohibition of child and forced labor. Provide a safe and healthy working environment for all employees and contractors.

Environmental Protection

Implement practices that minimize environmental impact and promote sustainability.

Complaint Channels

Fostering an open and transparent environment where all participants in the supply chain can voice concerns and report any issues without fear of retaliation.

Ontex's social, labor and environmental requirements are based on 3-steps expectations

• Shall:

Basic and minimum commitments to be followed at all times when conducting business, ensuring minimum compliance with the legal framework.

• Expectations:

Commitments that go beyond minimum compliance, align with Ontex and international standards.

• Encourage:

Commitments that foster opportunities for improvement and continuous learning.

Due Diligence Principles

At Ontex, we are committed to systematically and holistically embedding and improving human rights and environmental due diligence (HREDD) throughout our operations and value chains. We actively encourage our business partners to enhance their due diligence efforts, prioritizing the identification and mitigation of negative adverse impacts, with a focus on vulnerable groups and communities.

In line with the OECD Guidelines for Multinational Enterprises and international human rights frameworks, we apply a robust risk-based due diligence methodology to

identify, prevent, mitigate and remediate actual and potential adverse impacts in our value chain and business interactions. We encourage our suppliers to embrace these due diligence principles and promote responsible business practices throughout the supply chain.

By embracing this document suppliers are expected to embed these principles throughout their supply chain operations, engaging employees, business partners, subcontractors, consultants, and other stakeholders.



Social, Labor and Environmental Standards



1. Business Ethics

Ontex is committed to fostering a culture of openness and honesty, grounded on trust and integrity. We strive to engage with all stakeholders responsibly, ethically, and transparently.



1.2 Anticompetitive Practices

Suppliers shall respect and comply with all applicable fair trade, competition and antitrust laws and regulations.

Suppliers are expected to avoid any anticompetitive discussions or agreements, including illegal price fixing, market allocation, customer allocation or other illegal restrictive practices, at any level of the production or distribution chain.

Suppliers are encouraged to implement a company or group-wide fair competition compliance program that applies to all supplier subsidiaries.



1.3 Conflicts of Interest

Suppliers are expected to conduct business in an open and transparent manner, demonstrating a commitment to honesty and reliability, avoiding conflict of interest and ensuring that personal, financial or other outside interests do not interfere with employees' professional responsibilities.

Any situation in which a contractor may have a personal interest in or an economic relationship with a supplier must be reported immediately to Ontex through the usual reporting channels.



1.4 Bribery & Corruption

Suppliers shall not engage in any form of bribery or corruption, whether directly or indirectly, and shall refrain from any such activities.

Suppliers should avoid offering or accepting any improper benefits from a third party, whether private or public, to obtain or retain business or gain preferential treatment. Improper benefits include cash, job opportunities, favors, travel, facilitation payments, promises to pay debts, or unlawful gifts and entertainment.



1.5 Gifts & Hospitality

Suppliers are expected to ensure that the gifts and entertainment given to or received by our employees are not excessive and are solely for building solid and trustworthy business relationships. And, ensure that business decisions are made on their merits and are not improperly influenced.

Our employees will only accept gifts and entertainment from suppliers that are consistent with our Code of Ethics.



1.6 Money Laundering

Suppliers shall strictly adhere to all relevant anti-money laundering laws, rules, and regulations, and shall not be involved with organized crime or terrorist financing in any way.



1.7 Confidentiality and Intellectual Property Rights

Suppliers shall protect Ontex's confidential information and intellectual property rights by preventing misuse, mishandling, counterfeiting, theft, fraud or unauthorized disclosure by relevant laws and contractual agreements.

Suppliers are expected to implement a whistleblower process that allows their employees to anonymously raise concerns about misconduct.

Suppliers are encourage to:

- Implement an information management strategy, including a policy that ensures proper levels and thresholds and records for proper business integrity.
- Implement an effective anti-corruption compliance program that includes a process for conducting due diligence prior to entering relationships with suppliers to investigate and evaluate the integrity, quality, suitability and credibility of all potential suppliers.



1.8 Data and Information Privacy

Suppliers shall protect personal information and comply with all data privacy laws when collecting, storing, using, processing, or sharing personal information.

Suppliers are encouraged to implement a risk assessment process to identify and address privacy threats or risks.



1.9 Economic Sanctions

Suppliers are expected to act diligently and are encouraged to avoid engaging in business activities or making investments that could benefit entities associated with any country, organization, or individual subject to economic sanctions.



2. Labor Conditions and Human Rights

Labor conditions and human rights at work involve creating and maintaining safe, fair, and equitable workplaces. This includes ensuring fair wages, reasonable working hours, safe and healthy conditions, and freedom from discrimination and harassment.

It also guarantees the right to form and join trade unions and eliminates forced labor, child labor, and any form of exploitation, ensuring all workers are treated with dignity and respect.



2.1 Child Labor and Young Workers

Not all work performed by children is child labor. International standards define child labor as a work that is hazardous to a child's health and development, demands too many hours and/or is performed by children who are too young. Usually, child labor interferes with a child's right to education and to play.

Suppliers must not employ and/or use child labor, regardless of gender, under the age of 15, for any purpose and in any country of operation, and must actively prevent it through its supply chain, for instance, implementing robust age verification controls to ensure compliance. Where local laws require a higher minimum working age or compulsory schooling age, these higher limits take precedence.

Suppliers must not employ children or young persons under 18 at night or in hazardous conditions. Young worker shall be employed in a manner that allows access to continued education or other educational opportunities.



2.2 Forced Labor, Modern Slavery or Human Trafficking

Forced labor is any work or service performed by a person under the threat of a penalty and for which the person has not offered themselves voluntarily, violates the fundamental human right to free choice of employment and to just and favorable conditions of work. It is rooted in poverty, discrimination, and lack of social protection, and disrupts fair competition between businesses. Human trafficking often involves forced labor, further worsens these violations and perpetuates exploitation.

Suppliers must never take part in any form of forced labor, bonded labor, involuntary prison labor, or human trafficking. This includes the recruitment, transfer, or use of people for labor exploitation. This rule also applies to child labor, the sale and trafficking of children, debt bondage, and forced or compulsory labor.

Suppliers shall protect the freedom of movement for all workers, ensuring workers are not required to lodge "deposits" or their identity papers, and workers are free to leave their employer after reasonable notice. And ensure workers have access to free dispute resolution and effective remedies mechanisms.

Suppliers are expected to bear the responsibility of implementing robust measures to prevent modern slavery, human trafficking, and exploitation, while also championing equal opportunity and fairness for all workers.

For more information, check the [Ontex Modern Slavery Statement](#).



2.3 Fair and Just Working Conditions

Every worker has the right to working conditions that respect their health, safety and dignity, including limits on maximum working hours, daily and weekly rest periods, and to an annual period of paid leave.

2.3.1 Living wages

Suppliers shall comply with all relevant national laws, industry standards, and international benchmarks governing working conditions to ensure fair labor practices. This includes provisions for minimum wages, overtime pay, and legally required benefits (such as paid sick leave, annual leave, and parental leave).

Suppliers shall ensure that wages and benefits paid for a standard work week are at least equal to national legal standards or industry benchmark standards, whichever is higher. Wages must always be sufficient to meet basic needs and provide some discretionary income.

Suppliers shall ensure that deductions from wages as a disciplinary measure are not permitted. Deductions not provided for by national law should not be made without the express consent of the worker concerned. All disciplinary actions should be properly documented.

Suppliers are expected to provide all workers with written and understandable information about their terms and conditions of employment, including wages, prior to commencing employment.

2.3.2 Working hours

Suppliers shall ensure that working hours comply with national laws, collective agreements which are based on international labor standards. The standard that offers greater protection for workers shall prevail in determining compliance with working hour requirements.

Suppliers shall respect reasonable working hours, rest periods, and limit overtime according to legal requirements and industry standards.

Suppliers are required to ensure that all overtime work is voluntary. Overtime must be utilized responsibly, considering factors such as the extent, frequency, and hours worked by individual workers and the workforce as a whole. It should never be used as a substitute for regular employment. Furthermore, overtime shall be compensated at a premium rate.



2.4 Discrimination, Equality and Harassment

Discrimination at work means any distinction, exclusion or preference made on the basis of race, ethnicity, color, sex, religion, political opinion, national or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment . Upholding wage equality is a fundamental aspect of respecting and promoting human rights.

Suppliers shall prohibit explicitly physical abuse, threats of physical abuse, sexual harassment, verbal abuse, or any form of intimidation in the workplace. Suppliers must promote and maintain a workplace environment safe and free from harassment, respecting the principles of dignity and respect for all workers, without allowing any form of inhumane treatment.

Suppliers shall prohibit discrimination in all aspects of employment—hiring, compensation, training, promotion, termination, and retirement—based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation.

Suppliers are expected to adhere to ethical labor practices, specifically prohibiting wage discrimination between men and women, fostering a fair and inclusive work environment.

Ontex encourages suppliers to assess gender pay gaps and take actions to eliminate them.



2.5 No Precarious Employment is Provided

A precarious job is employment that offers compensation, hours, or security inferior to a “regular” job. Precarious work comes in many forms, for instance, agency workers, temporary work, seasonal work, homeworking.

Suppliers shall adhere to international principles of responsible recruitment and to ensuring that its recruitment partners adhere to the same standards in the recruitment of all workers, particularly those in vulnerable groups such as temporary and migrant workers.

Suppliers shall ensure that workers are never charged recruitment fees or costs, providing clear and transparent employment contracts to protect workers from any form of deception or coercion. This principle shall be extended to recruitment agencies.

Suppliers shall ensure that their recruitment processes and employment relationships prioritize the well-being of their workers by avoiding any element of insecurity or social and economic vulnerability, and fostering fair recruitment. Additionally, develop its work based on a recognized and documented employment relationship that complies with relevant national laws, industry guidelines, as well as international labor standards, with a commitment to the one that provides the greater protection.

We encourage our suppliers to:

- Make sure their own staff and their suppliers know about the International Labour Organization's principles on fair recruitment, including recruitment fees and forced labor.
- Define appropriate remedial actions as part of the grievance process.

2.5.1 Homeworkers

Suppliers are expected to ensure that subcontracting practices are consistent with principles that protect the welfare and rights of all workers involved. Subcontracting must not be used to compromise workers' rights.

Suppliers are encouraged to provide potential or future employees with comprehensive and easy-to-understand information. This information should cover their rights, responsibilities and terms and conditions of employment, including critical aspects such as working hours, remuneration and payment conditions.



2.6 Freedom of Association and the Right to Collective Bargaining

All workers have the right to be established and represented by legally recognized trade unions and join organizations of their own choosing. Collective bargaining is a key means through which employers and their organizations and trade unions can establish fair wages and working conditions. It also provides the basis for fair labor relations.

Supplier shall respect, without distinction, workers' rights to freely form, associate, join or not join trade unions and workers' councils, and to bargain collectively, following national laws and international conventions, ensuring freedom from reprisal, intimidation, or harassment.

Supplier shall facilitate, where the right to freedom of association and collective bargaining is restricted by law, the development of parallel means.

Suppliers are expected to engage in constructive dialogue with freely chosen union representatives and negotiate in good faith, and protect worker's representatives rights from discriminatory practices and ensure they have access to carry out their representative functions in the workplace.



2.7 Occupational Health & Safety (OHS)

A safe and healthy working environment is a fundamental principle and right at work. Ontex recognizes the responsibility to respect, promote, and implemented it in good faith, as stipulated in the international labor conventions. In addition, a vital tool to ensure a safe and healthy working environment is the active implementation of an efficient and effective occupational safety and health management system.

The supplier shall provide a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, as far as is reasonably practicable, the causes of hazards inherent in the working environment.

Suppliers shall be aware of OHS principles and national laws, as well as the provision of a safe and healthy working environment for occupational safety and health international regulation.

Suppliers shall provide access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

Suppliers are expected to:

- Provide workers with regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Foster workplace cooperation and consultation between management, workers and their representatives.
- Provide, where necessary, adequate protective clothing and protective equipment to prevent, so far as is reasonably practicable, the risk of accidents or of adverse effects on health.
- Provide accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

The company observing the code shall assign responsibility for health and safety to a senior management representative.

Management System Approach

An OHS management system consists of elements designed to establish and achieve occupational health and safety (OHS) policies and objectives.

The application of a systems' approach to the management of OHS in workplaces ensures that the level of prevention and protection is continuously evaluated and maintained through appropriate and timely improvements. These voluntary guidelines assist organizations (enterprises/workplaces) implementing the main elements of the OHS management system (i.e., policy, organizing, planning and implementation, evaluation and action for improvement), to promote continual improvement in OHS performance.

Supplier shall adopt a strategic system approach, policy oriented, with defined rights, responsibilities and duties in a preventative safety and health culture focused on prevention.

We encourage our supplier to implement a management system approach to occupational safety and health in line with the Guidelines on OHS management system (ILO- OHS 2001).



3. Environmental Protection

Principles associated with the expectation not to cause significant soil degradation, water pollution, air pollution, harmful noise pollution, or excessive water consumption that would significantly impair the natural resources to be protected and produced.



3.1 Environmental Impacts

Supplier shall operate environmentally responsible and resource efficiently, and comply with all applicable environmental laws and regulations, as amended from time to time, as well as the bans resulting from the environmental conventions referred to above about mercury, persistent organic pollutants, and hazardous waste.

Suppliers are expected to:

- Take proactive measures to protect the environment from damage and degradation related to their operations.
- Implement environment due diligence principles in their own operations and through their value chains, by identifying, preventing, mitigating and accounting for their adverse human rights, and having adequate governance, management systems and measures in place to this end.
- Integrate environmental considerations into their operations and strive for continuous improvement to minimize and mitigate any environmental impacts.

- Set up environment-related objectives, for instance, climate targets encompassing scopes 1, 2, and 3, ideally validated by the Science-Based Targets Initiative (SBTi), as part of their carbon reduction strategy.

System Management Approach

Suppliers operating production sites are expected to establish a practical tool to manage their environmental responsibilities and maintain an appropriate Environmental Management System (EMS) in line with international standards.

The best-known such standard is ISO 14001, setting out the criteria for an environmental management system (EMS).



3.2 Deforestation-free and Sustainable Land Practices

Climate change, biodiversity loss and deforestation are global issues of the utmost importance. They affect the survival of humanity and sustainable living conditions on Earth, particularly for indigenous peoples and local communities.

Suppliers shall comply with all applicable local, national and international environmental laws and regulations, and respect the land use rights of indigenous peoples and local communities and ensure that their operations do not violate these rights.

Suppliers shall ensure that their operations and raw material sourcing do not contribute to deforestation or forest degradation.

Suppliers are expected to:

- Adopt sustainable land management practices that conserve biodiversity and maintain ecosystem services.
- Conduct regular environmental impact assessments to identify and mitigate potential negative environmental impacts.
- Where possible, suppliers should demonstrate that the free, prior and informed consent of all affected communities and indigenous peoples has been obtained.



4. Complaint Channels

A grievance is any perceived injustice that evokes an individual's or group's sense of entitlement, which may be based on law, contract, explicit or implicit promises, customary practice, or general sense of fairness of aggrieved communities; it's referred to as a remedy ecosystem of different channels and steps to resolve adverse impacts.



Suppliers shall have in place accessible channels to raise concerns related to human rights, labor conditions, ethical business practices, and environmental protection.

We require our suppliers to:

- Cooperate in remediation through operational-level grievance mechanisms (OLGMs) that are either established or outsourced to a third-party organization and through other grievance processes (available options such as hotlines, third-party audit officers, digital platforms to receive complaints, etc. to be listed
- Provide accessible and anonymous complaint mechanisms for all employees and third parties to raise concerns or complaints related to the supplier's business practices .

- Make sure that employees and workers are aware of the ethical channel existence, and that regular information is provided to users including that the mechanism is free of charge, does not require legal representation, and that assistances can be provided to vulnerable users. These must be accessible to all workers using different languages and means adapted to them.
- Include the same provisions in their own supplier codes of conduct, contracts etc. to the extent possible.

Raising Concerns – Speak Up Channel

Suppliers, and the workers of the suppliers, are expected to inform Ontex of any concerns or allegations regarding the principles of this Code against their organization or supply chain as soon as they become aware of them.

If you, as a supplier, are aware of a violation or potential violation of our Supplier Code of Conduct, our policies, or the law, please raise your concern through our Speak Up web portal.

Remedial Action Plan

Businesses have a responsibility to respect internationally recognized human rights. This includes not causing, contributing to, or being directly linked to an adverse impact on human rights.

In cases of actual or potential violations of the Code of Conduct within their own operations or their business partners' supply chains, suppliers commit to taking immediate and decisive action to cease, prevent, or mitigate the violation. Upon request from Ontex, suppliers shall collaborate on developing and implementing a plan to cease, prevent, or minimize the violation.



5. Monitoring and Auditing

Ontex ensures supplier compliance with the Code through a variety of assurance methods, including third-party social audits, self-assessment questionnaires and document reviews.

Based on Ontex Supplier Due Diligence program, suppliers are expected to provide social audit reports upon request by Ontex. These audits, conducted by independent auditors, focus on human rights, labor issues such as discrimination and forced labor, and environmental impacts within Ontex supply chains.

For more information refer to the **Ethical Sourcing Requirements documents**.



6. Compliance

We expect our suppliers to share the environmental, social and governance requirements which are expressed in this Supplier Code of Conduct and to replicate these standards further down the supply chain.

If a supplier is in breach of these principles and cannot agree on an improvement plan or does not implement it, Ontex reserves the right to terminate the commercial relationship.

Glossary



- The term "supplier" in this document refers to the company or organization with which Ontex has a direct agreement and any subcontractors involved in supplying products, services, materials, or components. This includes suppliers, service providers, and other parties involved in contracts.
- The Supplier Code of Conduct outlines essential rules, expectations, and values necessary for organizations to operate in a socially, ethically, and environmentally responsible manner. It serves as a guidebook outlining the requirements your company expects from stakeholders.
- **Due diligence** in human rights and the environment involves identifying, preventing, and addressing potential and actual impacts on people and the planet. It requires companies to assess their operations, supply chains, and business relationships for risks and to take appropriate action to mitigate harm. The minimum legal working age is defined by the national legislation and is the age at which a person can be employed.
- Young workers are people under 18 years of age, but above the minimum legal working age, who are engaged in work.
- **Fair recruitment (ILO)** includes respecting workers' rights, ensuring transparency and accountability, not charging fees to workers, complying with all legal and ethical standards, providing access to grievance mechanisms, and honoring clear and fair contract terms.
- **The Universal Declaration of Human Rights (UDHR):** is a milestone document in the history of human rights. Drafted by representatives with different legal and cultural backgrounds from all regions of the world, the Declaration was proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental human rights to be universally protected.
- **International Labour Organization (ILO):** is the specialized agency of the United Nation on employment and labour issues whose work adopting international labour standards and providing policy guidance, capacity building and technical assistance to governments, employers, and workers in its 187 member States.
- **The Organization for Economic Co-operation and Development (OECD):** is an intergovernmental organization with a mission to promote better policies for better lives of people around the world. Its member countries (37) span globe and include many of the world's advanced and emerging economies.
- **The OECD Guidelines for Multinational Enterprises:** are recommendations from governments to business on how to act responsibly. The OECD Guidelines for Multinational Enterprises cover major business ethics, from disclosure, human rights, employment and industrial relations, environment, combating bribery, bribe solicitations and extortions, consumer interests, science and technology, competition, and taxation. The Guidelines were adopted in 1976 and last updated in 2011 to include a chapter on human rights aligned with the UN Guiding Principles.
- **OECD Due Diligence Guidance for Responsible Business Conduct:** explains in plain language the due diligence requirements under the OECD Guidelines.

Principles and Source of Reference:

The OECD Guidelines align with ILO and UN instruments. This Supplier Code of Conduct is in alignment with the Guidelines for Multinational Enterprises on Responsible Business Conduct amended on 2023.

Child Labour | International Labour Organization (ilo.org)

ILO action against trafficking in human beings | International Labour Organization

ILO, Convention concerning Discrimination in respect of Employment and Occupation (C111), adopted on 25 June 1958 and entered into force on 15 June 1960.

The Fundamental Conventions on Occupational Safety and Health

Complain Channel - In alignment with the OECD Guidelines for Multinational Enterprises and the Whistleblower Directive (Directive (EU) 2019/1937) (the Directive) which requires every company or public body in the EU that has 250 or more employees to implement its own internal reporting policy for whistleblowing.

Supplier Code of Conduct

Our human, labor rights and environmental expectations

For questions regarding Supplier Code of Conduct, please contact:

sustainability@ontexglobal.com

