



# AMBATOVY

## SUPPLIERS CODE OF CONDUCT

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Ambatovy aims to be a leader in operational efficiency, health and safety, environmental management, and social engagement – while contributing to the long-term prosperity of Madagascar.

- Integrity,
- respect,
- honesty,
- excellence, and
- teamwork

These are Ambatovy's core values as well as fundamental characteristics of ethical corporate behavior.

Ambatovy expects its suppliers to share these core values and this Code of Conduct provide the minimum standards expected.

It outlines what we expect from our partners regarding compliance with international standards for health, safety, environmental management, human rights and business ethics.

Ambatovy also expects suppliers to ensure that this Code of Conduct is communicated to their employees, subsidiary and affiliated entities as well as any subcontractors.

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We may elect to not work with or cease to work with suppliers who do not meet our expectations.

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## Health, Safety and Environment

Ambatovy expects its suppliers to:

- ✓ comply with all applicable laws and regulation and beyond, best standards and practices
- ✓ take the necessary measures for maintaining safe and healthy workplace
- ✓ act to protect the environment in the communities within which they operate, promote a culture that value the environment and conserve natural resources

For this Ambatovy ask all suppliers to ensure that:

- the workplaces, machinery, equipment and processes under their control are safe and without risk to health;
- the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and
- adequate protective clothing and personal protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.

Ambatovy also encourage all suppliers to have an effective environmental policy.

Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility, minimize waste and maximize recycling.

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## Human Rights and Labour

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Ambatovy expects its suppliers to:

- ✓ support and respect the protection of internationally proclaimed human rights;
- ✓ prohibit forced or compulsory labour in all its forms and make sure in all their own supply chain that they are not complicit of child labour;
- ✓ uphold the elimination of discrimination in respect of employment and occupation.

For this Ambatovy ask all suppliers to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture, in accordance with the relevant International Labour Organisation (ILO) conventions. In addition, suppliers must have robust means of ensuring that the subcontractors in their supply chain also comply.

Suppliers must be committed to a workplace free of harassment and should not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse.

Working hours for suppliers' employees will not exceed the maximum set by the applicable national law.

Suppliers should ensure that they pay workers according to the applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers have to ensure the payment of wages in legal tender, at regular intervals no longer than one month, in full and directly to the workers concerned.

## **Anti-Corruption and ethical behavior**

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Ambatovy expects its suppliers to:

- ✓ work against corruption in all its forms, including extortion and bribery
- ✓ ensure personal activities and interest, and those of employees and subcontractors, do not conflict with their responsibilities to Ambatovy
- ✓ avoid gifts and hospitalities
- ✓ adopt and maintain at all-time an ethical conduct

For this Ambatovy ask all suppliers to adhere to anti-corruption laws and anti-money laundering regulations. We expect suppliers to have robust processes to ensure that the subcontractors in their supply chain also comply with these laws.

We have zero tolerance of any form of corrupt practices including extortion and fraud and we expect suppliers to be vigilant and proactively look for fraud, and the risk of fraud, in their business.

Suppliers must not seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims. This includes defrauding or stealing from the company, a customer or any third party, and any kind of misappropriation of property.

Suppliers should immediately notify Ambatovy where fraudulent practice is suspected or uncovered and disclose any interests that might impact their decision-making or the advice that they give to Ambatovy. Suppliers must also inform Ambatovy if they are concerned by any corruption case or accusation.

Suppliers have to avoid and disclose to Ambatovy any situation that may appear as a conflict of interest, or if any Ambatovy official or professional under contract with Ambatovy may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate Ambatovy policy or rules and standards of any recipient's organisation, and are consistent with reasonable marketplace customs and practices.



## **IDENTIFICATION OF CONCERNS**

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Suppliers are encouraged to provide means for their employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner.

In addition, you and your employees have access to our Whistleblower system (Reporting Hotlines at +261 32 320 36 22, EQS Integrity Line at <https://whistleblower.integrityline.org/> or dedicated Mailboxes installed at various locations of the Ambatovy premises).

The Ambatovy Whistleblower system is a “protected reporting system” where any incident that has occurred within Ambatovy, especially violations of applicable laws, internal regulations and procedures, or the internal Code of Conduct can be reported.

All information received is managed securely and confidentially.

We strongly encourage any supplier who becomes aware of any circumstance or action that may not comply with this Suppliers code of conduct to discuss these concerns with Ambatovy point of contact or report it via EQS Integrity Line, Reporting Hotlines or Mailboxes.

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