

Supplier Code of Conduct

Aurum Chemicals Sp. z o.o.

Responsible procurement of chemical raw materials and related services

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Document owner	Management Board
Effective date	Date of documented approval
Next review	Within 12 months of approval, or earlier after a material change

1 Company profile and scope

Aurum Chemicals Sp. z o.o. distributes chemical raw materials and advises customers on their selection and suitable alternatives. Its offer serves industries including plastics, rubber, paints and varnishes, building chemistry and cosmetics. Deliveries are coordinated with logistics partners.

Company details: ul. Kępowa 44, 40-583 Katowice, Poland; NIP 6342660122; KRS 0000906538; REGON 240798549; www.aurumchemicals.eu.

This Code sets minimum expectations for manufacturers and suppliers of chemical raw materials, distributors, warehouse operators, logistics providers, contractors and other providers of goods or services to the Company. Requirements apply according to the supplier's role, products, services and associated risks. Suppliers must communicate relevant requirements to subcontractors and manage compliance within the activities entrusted to them.

2 Legal compliance and business integrity

- Maintain the registrations, permits, licences, insurance and professional qualifications required for the goods or services supplied.
- Prohibit bribery, kickbacks, facilitation payments, fraud and falsification. Disclose conflicts of interest that may affect procurement, sales or other business decisions.
- Comply with applicable competition, sanctions, customs, export-control, tax and anti-money-laundering requirements. Do not engage in unlawful price, market or tender coordination.
- Protect confidential information, personal data and intellectual property. Maintain accurate records and provide truthful information during qualification, ordering, delivery and review.

3 Chemical compliance and product documentation

Suppliers of chemical raw materials must provide the information needed for lawful distribution and safe use. Obligations depend on the product, destination and the supplier's role in the supply chain.

- Meet applicable REACH and CLP obligations for the supplied substances or mixtures, including relevant registration, authorisation, restriction, classification, labelling and packaging requirements. Provide supporting compliance information on reasonable request.
- Provide current safety data sheets where required, in the required language, with relevant exposure scenarios where applicable. Communicate updated hazard and risk-management information promptly through the supply chain.
- Supply agreed technical specifications and relevant quality documentation, including certificates of analysis where required by the order or agreement. Product identity, composition information and performance claims must be accurate and adequately supported.
- Communicate information relevant to restricted substances or intended applications, including additional sector-specific requirements where applicable and agreed. Do not make unsupported claims about regulatory suitability, safety or environmental performance.
- Identify batches or lots and maintain records sufficient to trace supplied products and investigate a defect. Provide relevant manufacturer, origin and supply-chain information where required by law or agreed with the Company.

4 Product quality changes and incidents

Products must conform to the agreed specification and be supplied in suitable, intact packaging. Prevent contamination, unauthorised substitution and mixing of incompatible materials. Meet agreed shelf-life, storage and handling conditions where applicable.

Notify the Company before implementing material changes to the product, specification, manufacturing source or process where these may affect safety, compliance or agreed quality. Obtain approval where required by the agreement. Immediately communicate newly identified hazards, non-compliance or defects affecting supplied products, and cooperate in containment, withdrawal, recall or other corrective action as appropriate.

5 Safe storage handling and delivery

Manufacturers, warehouse operators and logistics providers must use competent personnel, suitable equipment and risk controls appropriate to the products. Provide required training, instructions and protective equipment. Apply product-specific precautions, segregation and spill-response arrangements and protect people, drains, soil and water during handling and storage.

For transport services, comply with applicable dangerous-goods requirements, including ADR for road transport where relevant. Use qualified personnel, roadworthy vehicles and correct transport documents; observe loading, cargo-securing, site, driving-time and rest requirements. Report accidents, damage, loss, spills and material safety risks connected with the Company's goods or services without delay.

6 Human rights and working conditions

- Use lawful and voluntary employment or engagement arrangements. Prohibit forced labour, human trafficking, debt bondage, coercion, retention of identity documents and worker-paid recruitment fees.
- Prohibit child labour and observe minimum-age requirements. Apply all legal safeguards to lawful work or training of young persons and exclude them from prohibited or hazardous tasks.
- Meet applicable requirements on pay, benefits, working time, overtime, breaks and rest. Maintain accurate records and do not use business deadlines to justify unsafe work or denial of required rest.
- Prohibit discrimination, harassment, bullying, violence, intimidation and degrading treatment. Respect lawful freedom of association, collective bargaining, worker representation and privacy.
- Assess occupational hazards, provide required safety measures and training, and investigate accidents and unsafe conditions. Give workers access to a grievance mechanism and prohibit retaliation for concerns raised on reasonable grounds.

7 Environmental requirements

Suppliers must comply with applicable environmental requirements and permits, prevent pollution and manage waste through lawful routes. Controls must reflect the manufacture, storage, handling or transport activities actually performed.

- Prevent chemical leaks and releases; maintain suitable containment and emergency arrangements. Notify the Company promptly of material environmental incidents connected with supplied products or services.
- Handle product residues, contaminated packaging and other waste according to their classification. Retain relevant records and use authorised waste-management providers where required.
- Use energy, water and materials efficiently. Reduce avoidable product and packaging losses and consider reusable or recyclable packaging where compatible with safety, quality and transport requirements.
- For logistics services, maintain vehicles and equipment and use appropriate route and load planning to reduce avoidable emissions and unnecessary journeys.
- Cooperate with proportionate requests for environmental information relevant to the supplied product or service. State the scope, method and limitations of emissions estimates, certifications or environmental claims.

8 Subcontracting and supply chain responsibility

Obtain prior written approval for subcontracting where required by the order or agreement. Identify relevant executing providers and verify their capability and eligibility. Communicate applicable product, safety, environmental and labour requirements and retain an auditable allocation of responsibilities. Concealment of the actual provider or unauthorised substitution of a product or service is prohibited.

9 Qualification and monitoring

Assess suppliers according to risk. For chemical suppliers, check legal identity, documentation, quality, traceability, regulatory role and environmental or labour risks. For warehouse and logistics providers, check relevant permits, insurance, equipment, dangerous-goods competence and safety history. Verify any certification relied on.

- Assess new suppliers before approval using requirements appropriate to the products and services. Apply enhanced checks to critical or higher-risk suppliers.
- Review performance periodically and after material changes, incidents, complaints or credible compliance concerns. Document approval, conditional approval, suspension or exclusion and the reasons.
- Include applicable sustainability requirements in new or renewed agreements. Review supplier risks and controls at least annually and track assessments and corrective actions.

10 Evidence verification and corrective action

Suppliers must retain evidence and provide it on reasonable request. Verification by the Company or a competent third party is subject to law, agreed contractual rights, confidentiality and proportionality. Cooperate in investigating credible concerns and agree time-bound corrective actions for identified deficiencies.

Serious or repeated breaches may lead to rejection of goods or services, suspension or termination in accordance with the agreement, and notification to competent authorities where required. Consider the severity of the risk, the supplier's response and potential effects on affected people. Where harm has occurred, cooperate in appropriate remediation and verify completion of agreed actions.

11 Reporting concerns

Suppliers and their workers may use authorised channels under the Company's Grievance and Whistleblowing Procedure, AC-ESG-WB-002, including its independent conflict route. Handle concerns confidentially and fairly. Retaliation against persons reporting on reasonable grounds or assisting them is prohibited.

office@aurumchemicals.eu is a general contact address for requesting secure reporting instructions without sensitive details. It is not confirmed as a restricted whistleblowing mailbox. Statutory whistleblower protection and external reporting rights apply where the legal conditions are met.

12 Supplier acknowledgement and Company approval

An accepted order, contract or onboarding requirement expressly incorporating this Code commits the supplier to its applicable provisions. A signed acknowledgement may be requested. This draft becomes effective upon documented Management Board approval; communicate the approved version to relevant suppliers.

Signature Not Verified
 Dokument podpisany przez
 Grzegorz Szczepanik
 Data: 2026.09.30 13:22:17 CEST

Company signature: _____ Approval date: _____

Sources

Sources consulted on 30 September 2026: aurumchemicals.eu/en/p/about-us-en; aurumchemicals.eu/en/contact; ECHA guidance for distributors; European Commission guidance on classification, labelling and packaging of chemicals.