



SUPPLIER CODE OF CONDUCT

Sonaca Group (i.e. Sonaca s.a. and its subsidiaries hereinafter referred to as “Sonaca”) wishes to actively engage its supply chain by the adherence of all its suppliers to its Supplier Code of Conduct (herein the “Supplier Code”) that has been developed with recognition of the ten (10) principles outlined in the United Nations Global Compact. The UN Global Compact’s ten principles in the areas of human rights, labor, the environment and anti-corruption enjoy universal consensus and are derived from:

- **The Universal Declaration of Human Rights:**
<http://www.un.org/Overview/rights.html>
- **The International Labor Organization's Declaration on Fundamental Principles and Rights at Work**
<http://www.ilo.org/public/english/standards/decl/declaration/text/>
- **The Rio Declaration on Environment and Development**
<http://www.un.org/documents/ga/conf151/aconf15126-1annex1.htm>
- **The United Nations Convention Against Corruption**
<http://www.unodc.org/unodc/en/treaties/CAC/index.html>

Legal Compliance

The provisions of this Supplier Code set forth Sonaca's expectations from all suppliers with whom it does business. Therefore, Sonaca expects Supplier and any of its subsidiaries or affiliates to comply with its principles.

Although the Supplier Code only applies to Sonaca's direct suppliers, Sonaca encourages Supplier to invite its own Subcontractors to comply with its terms.

Suppliers, their employees, agents and representatives are expected, as a minimum, to comply with the requirements set forth in this Supplier Code or with the provisions of the laws and regulations in each jurisdiction(s) where Supplier operates, whichever is more stringent.

Labor

Sonaca expects Supplier to comply, as a minimum, with all applicable local laws and regulations related to labor and employment including, but not limited to, minimum wage, maximum hours of work, days of rest, compensation, freedom of association, right to organize and collective bargaining.

Furthermore, Sonaca expects Supplier to comply with the following principles:

Child Labor

Sonaca will not engage in nor support the use of child labor. Supplier is expected not to use child labor. By child labor, it means employees under the age of fifteen (15) years old. However, for employment or work which by its nature or circumstances is not suitable for a person under the age of eighteen (18) years old, child labor shall mean employees under the age of eighteen (18) years old.

Forced or Compulsory Labor

Sonaca will not engage in nor support the use of forced or compulsory labor. Supplier is expected not to demand any work or service from any person under the threat of any penalty. For example, Supplier's employees must be free to leave work or terminate their employment with reasonable notice, and they are not required to surrender any government-issued identification, passports or work permits as a condition of employment.

Freedom of Association

Supplier is expected to recognize the principle of freedom of association and the right to collective bargaining.

Respect and Dignity

Supplier is expected to treat all employees fairly, ethically, respectfully and with dignity. Supplier must protect its employees from harassment, bullying and victimization in the workplace, including all forms of sexual, physical and psychological abuse.

Discrimination

Sonaca supports diversity and employment equity. Supplier is expected to offer equal employment opportunities and compensation without any discrimination, unless such discrimination is based on the inherent requirements of the job or in the course of a program to promote diversity.

Health & Safety

Sonaca provides a safe workplace to its employees. Sonaca expects that the occupational health and safety of employees is a priority for Supplier throughout all significant aspects of its activities. As a minimum, Supplier must comply with all applicable health and safety laws, regulations and standards. Supplier shall take appropriate action, such as policies, standards, procedures, contingency measures, and management systems, in order to prevent occupational illnesses and work-related accidents and to provide a safe and healthy workplace to its employees.

Sonaca encourages Supplier to:

- a) communicate to its management, employees, and contractors its commitment to improving health and safety, and to provide training on such commitment; and
- b) systematically evaluate its health and safety performance through appropriate audits and report progress.

Environment

Sonaca conducts its operations in a sustainable way and in compliance with the environmental laws and regulations. Sonaca expects that environmental protection is a priority for Supplier in all significant aspects of its activities. As a minimum, Supplier must comply with all applicable environmental laws, regulations and standards. Supplier shall strive to reduce the impacts of its activities and products on the environment.

Supplier shall:

- a) adopt any appropriate policy, standard, procedure, contingency measure and management system in order to ensure that its operations are managed ecologically and in a sustainable way; and
- b) take necessary measures in order to prevent pollution, to conserve and use rationally the natural resources required for its operations and implement relevant emergency response plans and procedures.

Sonaca encourages Supplier to:

- a) communicate to its management, employees, and contractors its commitment to improving environment, and to provide training on such commitment; and
- b) systematically evaluate its environment performance through appropriate audits and report progress.

Anti-Corruption

Sonaca promotes integrity and ethics in all aspects of its activities. Sonaca expects Supplier to comply with all applicable laws and regulations on corruption, bribery, prohibited business practices and extortion. Furthermore, Supplier must never make or approve an illegal payment to anyone under any circumstances.

Conflict of Interest

Supplier must disclose any actual or potential conflict of interest, and discuss it with Sonaca's management. Any activity that is approved, despite the actual or apparent conflict, must be documented.

Governance

Sonaca may verify the compliance of all its direct suppliers with the Supplier Code. Such verification will be conducted by way of a supplier's self-evaluation or an audit by Sonaca (or an external resource designated by Sonaca) who may visit Supplier's facilities with or without notice.

Compliance with the principles contained in the Supplier Code is a criterion that is taken into consideration in Sonaca's supplier selection process.

Sonaca will continue to develop monitoring systems to assess and ensure compliance with the Supplier Code.

Sonaca encourages Supplier to:

- a) implement policies, procedures, tools and indicators necessary to ensure compliance with the principles listed above; and
- b) commit to the principles of the United Nations Global Compact.

Responsibility of Supplier

As a supplier of Sonaca, Supplier's role begins, but does not end, with understanding this Supplier Code. If any ethical or legal compliance issues arise that raise any questions, Supplier has the responsibility to bring them forward to Sonaca's management.

Supplier confirms that it has reviewed the Sonaca Code of Conduct as provided in this Annex VIII (also defined as "Supplier Code") and recognizes that it reflects principles which are also described in the PPG's Global Code of Ethics accessible in various languages at <http://corporate.ppg.com/Our-Company/Ethics.aspx>. Therefore, Supplier undertakes to comply with the principles set forth in the Sonaca Code of Conduct, to the extent that they are consistent with those of the PPG's Global Code of Ethics.

