



General OXO

Your Door to Petrochemicals

Stabio, December 2021

Sustainable Procurement Policy

Premise

General-OXO s.a. deals with the marketing of petrochemical products with a dynamic and holistic approach: the offer of top quality products at competitive prices is what it deals with but the core business is the creation of wealth for the whole community.

In October 2019 General-OXO s.a. summarized the principles that animate it in a document, the "Company Policy", discussed and shared by all company functions: from this document we have extracted the rules enshrined in this "Sustainable Purchasing Policy", in order to share them with our partner.

General-OXO s.a. undertakes to:

- Identify the areas at greatest risk (child labor, non-eco-sustainable production,...) within our supply chain;
- Give priority to suppliers who share and apply ethical and sustainable practices within their organization.

Through this shared code of conduct, General-OXO s.a. wants to be sure of being part of a value production chain in which human rights are respected and the ethical, social and environmental issues we pursue are acknowledged.

Our commitment to suppliers

General-OXO buyers should be aware that:

- o Confidentiality and privacy protection
Each employee must abide by the rules set out in the Privacy Code drawn up by General-OXO s.a., inspired by the European Regulation on privacy (GDPR, General Data Protection Regulation). The buyer who comes into possession of data cannot use them for personal purposes and cannot disclose them for any reason, even at the end of the employment relationship.
- o Conflict of interest
The employer is careful to avoid that personal interest can influence the impartiality of a buyer. If there are reasons to believe that there is a conflict of interest, employees are required to report every circumstance and analyze it together with the person concerned.
- o Competition, fairness and transparency
In the selection we promote real and serious competition between suppliers. In the choice, however, suppliers are preferred who show that they share the principles adopted by our business vision, set themselves long-term objectives and operate on the market animated by a spirit of fairness in commercial relations.

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The commitment we require from our suppliers

A necessary condition for making a purchase is that the supplier complies with the laws in the countries in which it operates. Furthermore, in order to proceed with the purchase, the supplier must concretely demonstrate:

- Do not use child labor
In compliance with Conventions nos. 138 and 182 of the International Labor Organization, the supplier undertakes not to employ human capital below the minimum age required and in any case not less than 14-15 years (depending on the laws of the country), 18 years for hazardous work.
- Do not use materials from conflict areas (conflict resources) within their production process.
- Provide adequate working conditions
The supplier undertakes to pay its workers at least the minimum legal wage and, in any case, a wage sufficient to guarantee the subsistence of the workers and family members who depend on it. The worker has adequate working hours and at least one day off per week, except in exceptional conditions duly documented.
- Caring for the health and safety of its workers
The supplier undertakes to provide a document indicating the safety measures adopted to safeguard the health and safety of its workers.
- Minimum mandatory security measures:
 - ✓ Appropriate work clothing
 - ✓ Training for employees who find themselves using dangerous machinery
 - ✓ Reporting of risk situations.

General-OXO s.a. and the Responsible supply-chain

The supplier must ensure that its activities do not harm the environment and that they comply with the laws and regulations in force in the countries in which it operates.

The supplier, through the processes implemented in the field, monitors that its products do not contain restricted or prohibited materials and must immediately inform General-OXO s.a. in the event of forced or voluntary changes relating to the composition or manufacture of the delivered product.

Chemicals and other materials that pose a hazard to the environment are identified, labeled and managed to ensure that they are handled, used, transported, stored, recycled or reused and disposed of safely and in compliance with regulations. Workers handling these products and other materials are trained, equipped and emergency procedures are in place in the event of accidents presenting a risk to the environment.



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Monitoring systems

The supplier must take all appropriate measures so that the environmental risk is quantified and kept under control by compliance with standard procedures codified within the company.

The supplier undertakes to develop a production system that is able to measure and reduce:

- Use of non-renewable resources;
- Energy and water consumption;
- Greenhouse gas emissions, in relation to the transport adopted by specifying the distance traveled, tonnage, model of truck used for all materials delivered or shipped;
- Environmental pollution (water, soil, air);
- Waste produced.

Documentation

General-OXO s.a. requires that each supply be accompanied by:

- COA (Certificate of analysis) to verify that the product complies with the quality standard technical specifications agreed upon during the approval phase,
- SDS (Safety data Sheet) most recent and compliant with the ECHA Regulations (European Chemical Agency). It must indicate how the substance must be handled by users and transporters and the measures to be taken to reduce exposure hazards for humans and the environment (Exposure Scenarios),
- REACH Certificate (European Regulation No. 1907/2006) which protects the distributor and the user regarding the compliance of the product with the safety and quality standards imposed by ECHA.

Furthermore, we believe it is essential that the SDS of each marketed substance, therefore both purchased and sold, is drawn up in compliance with the provisions in force on the transport of goods: su strada secondo Regolamenti ADR (European Agreement concerning the international Carriage of Dangerous Goods by Road),

- or by sea according to IMDG Regulations (International Maritime Dangerous Goods),
- or by rail according to the RID Regulation (Règlement concernant le transport International Trenoire des marchandises Dangereuses),
- or by air according to IATA Regulations (International Air Transport Association).

Packaging

The supplier is committed to offering environmentally friendly packaging that can be recycled as non-hazardous waste. In addition, the packaging must comply with the CLP (Classification, Labeling and Packaging) Regulation, officially EC Regulation No. 1272/2008. Where this is not possible, it must still comply with the GHS classification and labeling system.

Certification

General-OXO s.a. undertakes to prefer products from certified suppliers ISO 9001 ("Quality management system"), ISO 14001 ("Environmental management system") and ISO 50001 ("Energy management system").

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Adherence to the principles of Sustainable Procurement of General-OXO s.a.

We hereby confirm that we have received and fully understood the Sustainable Procurement Policy of General-OXO s.a. and we are committed to implementing its principles.

We are also aware that a major failure to comply with these principles may lead General-OXO S.A., subject to existing relationships, to forfeit its future supplies and exclusion from the supply chain.

Company name: [REDACTED]

Sales manager

Name: [REDACTED]

Date: 01.08.2022

Signature: [Handwritten Signature]