



# Global Supplier Code of Conduct

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Policy Number	N/A
Name of Document in English	N/A
Category	Procurement / Suppliers
Type	Code of Practice
Approved by (Name and Title)	Alejandro Pena, Chief Executive Officer
Date Document Took Effect	15/09/2023
Last Review	N/A
Next Review	15/09/2024
Version Number	1
Level	Global
Related Policies and Documents	<a href="#">Code of Conduct</a> , <a href="#">Global Speaking Up Policy (Whistleblowing)</a> , <a href="#">Global Anti-Retaliation Policy</a> , <a href="#">Global Anti-Corruption Policy</a> , <a href="#">Global Conflict of Interest and Outside Employment Policy</a> , <a href="#">Global Human Rights Policy</a> , <a href="#">Global Procurement Policy</a> , <a href="#">Global Data Protection Policy</a> and <a href="#">Global Privacy Policy</a>
Reviewer (Name and Title)	N/A
Sponsor (Name and Title)	Nir Palistrant, General Counsel
Owner (Name and Title)	Rudi Ghijsens, Regional EU Director of Procurement

## 1. Purpose

At Keter, we are committed to upholding and practicing our six core values in all of our decisions, business behaviour, and sustainability approach:

- Innovation
- Entrepreneurship

- One team
- Agility
- Accountability
- Respect

Our Values are the foundation of who we are and shape how we work with each other and with our partners.

Keter conducts business in an ethical, socially responsible, and environmentally sustainable manner.

We believe acting ethically and responsibly is also the right thing to do for our business. Keter has developed a Global Supplier Code of Conduct ("**Supplier Code**") to set out our global minimum expectations in the areas of business integrity, anti-corruption, labour practices, associate health and safety, and environmental management. Keter's Supplier Code is intended to complement Keter's Global [Code of Conduct](#) and the company's other policies and standards referenced therein.

## 2. Scope

This Supplier Code outlines the standards and business practices to which we require all of our direct and extended suppliers to adhere. The scope of this requirement includes all tiers of suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants (each a "**Supplier**" and collectively "**Suppliers**"). It also extends to parent, subsidiary, agents, subcontractors, and affiliate entities and applies to all employees, including permanent, temporary, contract, foreign, or migrant workers (each an "**Employee**" and collectively "**Employees**"). It is the Supplier's responsibility to ensure compliance with both the intent and letter of this Supplier Code among all Employees and throughout its supply chain, including all sub-tier suppliers/individuals, through dissemination, education, and verification.

Keter reserves the right to verify due diligence and compliance with this Code through internal or external assessment mechanisms such as, but not limited to, self-assessment questionnaires, independent assessments, surveys, and audits. Keter reserves the right to terminate any agreement or business relationship in which a Supplier does not comply with this Supplier Code.

This Code supersedes any previous Code or verbal agreement.

### **3. General Rules**

#### **3.1. Business Ethics**

What makes Keter the global leader in consumer lifestyle solutions is not only our iconic brands and products, but also the trust we have built with our consumers and stakeholders. This trust is maintained by the integrity of our everyday actions, business ethics and lawful conduct.

Our Suppliers are an integral part of our ecosystem and success and help us build and maintain our reputation. Therefore, it is essential for us that all Suppliers involved with Keter's commitment to and uphold the highest standards of ethics and integrity, values, and operating principles.

#### **3.2. Legal Compliance**

Suppliers shall comply with all applicable laws and regulations within the countries that the Supplier operates. For Service Providers, the location of service delivery shall take precedence. Suppliers shall also comply with all treaties and international standards and regulations such as those related to international trade (including sanctions, export controls, and reporting obligations) data protection and data transfer rules, and anti-trust competition laws.

##### **3.2.1. Corruption**

There is a prohibition on any and all forms of bribery, extortion or embezzlement.

Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. "Corruption" generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.

Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate, including the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions.

##### **3.2.2. Conflicts of Interest**

All and any conflict of interest in any business dealings with Keter, of which the Supplier is aware, shall be declared to Keter to allow Keter the opportunity to take appropriate action. Any ownership or beneficial interest in a Supplier's business by a government official, representative of a political party or a Keter worker shall be declared to Keter prior to any business relationship with Keter. Inform Keter of any demands or pressures of any kind to offer bribes (any kind of advantage) directly or indirectly to public officials or other parties

with the intent to exercise influence or obtain an unfair advantage.

### ***3.2.3. Financial Records, Money Laundering and Insider Trading***

All business and commercial dealings shall be transparently performed and completely and accurately recorded in the Supplier's books and records. There shall be no actual or attempted participation in money laundering. No confidential information in the supplier's possession regarding Keter shall be used to either engage in or support insider trading. Suppliers are expected to take necessary measures to protect confidential Keter data and information available to them.

### ***3.2.4. Gifts and Hospitality***

Any business entertaining or hospitality with Keter personnel will be kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way Keter's decisions about how Keter awards future business. Keter Employees can refer to the [Global Anti-Corruption Policy](#).

Suppliers are prohibited from providing or offering gifts to Keter Employees that could inappropriately influence Keter's business decisions or gain an unfair advantage.

### ***3.2.5. Information Security and Data Privacy***

The integrity of information and data is critical for the continuity of our operations and for the protection of all those involved in our business. We are committed to maintaining high standards of controls and information security practices while protecting the personal information of all who entrust us with their data. In 2021, we achieved ISO 27000 Information Technology Standard certification for our global headquarters IT systems.

All and any personal information about individuals are handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations, as detailed in the [Global Privacy Policy](#).

Suppliers with access to Keter's confidential information should not disclose such information to any other person without our advance written consent.

## ***4. Human Rights***

We believe in the inherent rights of all people as expressed in the Universal Declaration of Human Rights and strive to uphold the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Our Suppliers must share Keter's commitments to human rights:

- expressly prohibit any form of child labour in our business or through our supply chain
- expressly prohibit any form of forced or bonded labour
- respect the rights of employees to freedom of association and collective bargaining
- strive to prevent discrimination in all its forms throughout our business

Keter has also developed a [Global Human Rights Policy](#) to raise awareness and the understanding of our Employees of the Company's Human Rights impact across the organisation, to better identify risks and opportunities, and start to build in-house management capacity that demonstrates a sincere commitment to respect and support Human Rights.

## **5. Working Environment**

Keter is committed to equal employment opportunity, to a diverse, inclusive workforce and to create a fair and safe workplace for all.

Our Suppliers shall create a work environment in which Employees and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Keter's standards and expectations are detailed in the [Global Anti-Discrimination, Anti-Harassment and Anti-Bullying Policy](#) and the [Global Anti-Retaliation Policy](#). Employment decisions must be based on qualifications, skills, performance, and experience. Any form of discrimination is strictly prohibited. Examples of discrimination may include (but not limited to) discrimination based upon race, colour, religion, gender or sex (including pregnancy), sexual orientation, age, gender identity, genetic information, disability, ancestry, national origin, marital status, and veteran or military status.

### **5.1. Working Hours, Wages and Benefits**

Suppliers shall comply with all applicable wage and hour laws, including minimum wage, overtime, maximum hour rules, meal and rest periods, and to provide legally mandated benefits. Where local industry standards exceed applicable legal requirement, Suppliers are encouraged to provide wages that meet the higher local industry standards.

### **5.2. Health and Safety**

Suppliers must comply with all applicable health and safety laws, rules, regulations and industry standards. We expect our Suppliers to be committed to and support the improvement of the health and safety of their operations, employees and the surrounding community. Our Suppliers are expected to take all reasonable and necessary actions to prevent accidents and injuries, analyse and minimize health and safety risk exposure, protect

their physical assets, ensure business continuity and engender public trust.

## **6. Environmental Responsibility**

At Keter, we believe in a better world, and that it's up to us to help shape what's next for a better day. Everything we do must be guided by our aspiration to invent and create in ways that improve the quality of life for our customers and deliver value for all. As part of a global community, our aspiration goes well beyond doing no harm; we aim to be a positive contributor to a prosperous future for people and for the planet. Our strategic approach to sustainability is supported by measurable goals and focused on the areas in which we can make the biggest impact. Suppliers shall comply with all applicable environmental laws, regulations, and operating permits, always maintaining a status of legally compliant.

Suppliers shall also comply with all applicable environmental laws and regulations required of Keter by its customers, always maintaining a status of legally compliant.

Suppliers shall support our Corporate Responsibility commitments through continuous improvement and performance measurements of environmental and social indicators within their own operations and throughout their supply chain.

Suppliers shall support Keter's priorities to reduce carbon emissions, waste generation and water consumption, therefore strive to reduce environmental impact through efficient use of resources and environmentally friendly technologies, as well as efforts such as ending deforestation, minimizing greenhouse gas emissions and waste, and using resources efficiently.

## **7. Monitoring and Reporting**

### **7.1. Monitoring**

Keter will send the Code of Conduct to all suppliers or add this Code of Conduct to the contract agreed with the suppliers, additional during initial meetings with potential new suppliers the Code of Conduct will be part of the presentation and the request for pricing.

Keter is responsible for supporting and evaluating Suppliers and may engage in due diligence activities to assess compliance with this Supplier Code including, but not limited to, onsite inspection of facilities and review of books and records. Keter reserves the right to carry out unannounced inspections of Suppliers either by internal Keter staff or by a third party chosen by Keter.

Any non-compliance with the Supplier Code must be reported and investigated to the extent necessary. Suppliers who do not meet the requirements of this Supplier Code will be provided with the opportunity to bring their business up to Keter's standards in a reasonable

time frame. We reserve the right to terminate our business relationship with any Supplier who fails to do so or refuses to comply with this Supplier Code.

### ***7.2. Supplier Self-Monitoring***

If any Supplier has an actual or potential ethical or legal concern related to the subject matter of the Supplier Code or any engagement or relationship with Keter, they are encouraged to make Keter aware of this concern. This can be done through the [EthicsPoint hotline](#).

## ***8. The Extent of the Code***

This Code does not account for the differences or for changes in legislation, judicial and administrative precedent, or other developments and/or interpretations of applicable law.

As laws change, we may need to revise and modify this Code. We reserve the right to amend and update this Code at any time.