



SUPPLIER CODE OF CONDUCT

CONTENTS

FOREWORD	2
HUMAN RIGHTS AND LABOR STANDARDS	3
• Freedom of association and collective bargaining:	3
• Child labor and forced labor:	3
• Discrimination:	3
• Harassment and violence:.....	3
QUALITY, ENVIRONMENT, HEALTH, AND SAFETY	4
• Quality and safety of products and services.....	4
• Respect for the environment.....	4
• Health and safety	4
BUSINESS ETHICS AND TRANSPARENCY	5
• Competition law.....	5
• Anti-corruption	5
• Conflict of interest	5
• Gifts and hospitality	5
• Trade sanctions	5
• Confidentiality.....	6
• Transparency and honesty.....	6
VIOLATION OF THE CODE	7



FOREWORD

Gantrade Corporation strives towards being exemplary in terms of sustainable development.

Gantrade's policy with respect to corporate, social, and environmental responsibility is based on strong values shared by all its employees.

Gantrade is committed to the principles of the Responsible Care® Global Charter (the chemical industry's voluntary health, safety, environment, and sustainable development initiative) and the United Nations Global Compact.

Gantrade requires its Suppliers to share the same principles which are outlined in this Code of Conduct (hereinafter the "Code").



HUMAN RIGHTS AND LABOR STANDARDS

Gantrade requires its Suppliers to protect the rights of their employees and to comply with all relevant national regulations and laws regarding employment and industrial relations. In particular, Gantrade requires that its Suppliers agree to the following:

- Freedom of association and collective bargaining:

Gantrade requires its Suppliers to respect the rights of employees to freely associate and bargain collectively in accordance with applicable national laws.

- Child labor and forced labor:

Gantrade Suppliers shall refrain from using child, forced, bonded or involuntary prison labor.

- Discrimination:

Gantrade shall not tolerate any form of discrimination from its Suppliers based on personal characteristics such as national origin, gender, color, race, nationality, sexual orientation, age, religion, political opinions, or against qualified individuals with disabilities.

- Harassment and violence:

Gantrade requires its Suppliers to treat all employees with dignity and respect and to protect them from harassment, intimidation, and violence in whatever form at the workplace.



QUALITY, ENVIRONMENT, HEALTH, AND SAFETY

Gantrade is committed to the principles of the Responsible Care® program, a voluntary initiative towards responsible management of products and activities through a strategy of on-going and sustainable progress. Gantrade requires its Suppliers to comply with the principles of this program, and in particular with the following:

- Quality and safety of products and services

Suppliers shall ensure that the products and services they supply comply with all applicable quality and safety standards. No substance prohibited by the relevant laws and/or regulations in the countries where they operate and/or which present an unacceptable level of risk for human health or the environment must be included in their products and/or services.

- Outsourcing

Suppliers shall not outsource production of products supplied to Gantrade to another company (*i.e.* toll manufacturing) without prior approval of the proposed tolling supplier by Gantrade.

- Respect for the environment

Suppliers shall comply with the applicable international standards and national regulations and laws regarding the protection of the environment. Gantrade requires its Suppliers to undertake initiatives to prevent, assess, mitigate, and avoid the risks and impacts of their business activities on the environment. Accordingly, Suppliers shall have an effective and appropriate environmental management policy.

- Health and safety

Gantrade requires its Suppliers to comply with all applicable international standards, national regulations, and laws to ensure a safe and healthy workplace for its employees to prevent the risks of accidents or occupational diseases.



BUSINESS ETHICS AND TRANSPARENCY

Gantrade considers business ethics and transparency as being of the highest importance and as such, requires its Suppliers to comply with the following principles:

- Competition law

Suppliers shall perform their business activities in accordance with the relevant competition laws and regulations in the countries where they operate.

- Anti-corruption

Suppliers shall operate in accordance with the national and international laws and regulations on corruption and money laundering. Suppliers shall not pay, or offer to pay, anything of value, directly or indirectly to any individual for the purpose of gaining a business advantage, making sales of products, or acquiring or retaining any business, or influencing any act or decision of that individual.

- Conflict of interest

Suppliers are required to prevent and avoid any situation that may create a conflict of interest. They shall disclose to Gantrade any conflict between a personal interest of one of their employees and the interests of Gantrade.

- Gifts and hospitality

Suppliers are prohibited from offering to any Gantrade employees any gift or invitation of more than modest value and that may influence any decision made by Gantrade employees within the context of their business relationship.

- Trade sanctions

Suppliers shall comply with international trade law and especially with trade sanctions imposed by international institutions or governments.



- Confidentiality

Suppliers shall protect confidential information transmitted by Gantrade. They shall not use or disclose said information to third parties outside of the contractual framework set out with Gantrade.

- Transparency and honesty

Suppliers shall communicate clear, correct, and truthful information to their stakeholders and to Gantrade within the context of their business relationship with Gantrade.

- Country of Origin and transshipping

Suppliers shall ensure that the country of origin of the good they supply is clearly indicated on packages and documentation in accordance with the laws and regulations of the importing country.

Certificates of Origin required by the laws and regulations of the exporting and / or importing country, especially those required by free trade agreements, shall be provided with each shipment. Gantrade requests that a Certificate of Origin accompany all shipments.

Suppliers shall not engage in “transshipping”, the practice of attempting to disguise the country of origin of goods to evade customs duties.

- Conflict Minerals

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten, and gold in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.



VIOLATION OF THE CODE

Suppliers shall report to Gantrade any violations of this code.

Gantrade reserves the right to audit any Supplier to ensure that this Code is being adhered to and, where there has been a violation, to ensure that relevant corrective measures for complying with this Code have been taken.

Suppliers shall cooperate with Gantrade in case an audit would take place. Such audits would be conducted in accordance with the terms and conditions mutually set out by the Suppliers and Gantrade.