

Responsible Sourcing Policy (RSP)

Contents

1. Introduction.....	2
2. Scope of this policy.....	2
3. Sustainability topics covered by this policy.....	2
4. What we expect from our suppliers.....	4
4.1 Employee health and safety	4
4.2 Minimum and living wage.	5
4.3 Working time	6
4.4 Modern slavery.....	6
4.5 Diversity, discrimination and harassment.....	7
4.6 Freedom of opinion and association	8
4.7 Facilities and dormitories.....	8
4.8 Use of security forces.....	8
4.9 Unlawful eviction	8
4.10 Grievance.....	9
4.11 Sub-contractors.....	9
4.12 Environmental protection.....	10
4.13 Specific environmental conventions.....	11
4.14 Climate change mitigation	11
4.15 Responsible sourcing of minerals and agriculture products	12
4.16 Business ethics	12
5. Monitoring of supplier's sustainability performance.....	13
5.1. Business Partner Code of Conduct.....	13
5.2. Anti-bribery and anti-corruption (ABAC).....	13
5.3. Supplier CSR program	13
5.4. TfS audit program.....	14
5.5. Supplier decarbonization program.....	14
5.6. Human rights due diligence (TierN management).....	14
6. Supplier trainings.....	14
7. Grievance process for our suppliers.....	15
8. Frameworks.....	16
8.1. Together for Sustainability (TfS).....	16
8.2 International sustainability standards AkzoNobel is committed to.	17
9. Ownership of this policy	17
Appendix.....	18

1. Introduction

Sustainability is at the core of our identity at AkzoNobel. It's been a core value for many years and forms an integral part of our company purpose, Paint the Future.

We expect our suppliers to also demonstrate their commitment to sustainability and to share our values, as outlined in our [Business Partner Code of Conduct](#).

Partnerships based on responsible sourcing strengthen our supply chain and the businesses within it. They help us mitigate risk and build trust among consumers and stakeholders. AkzoNobel's Responsible Sourcing Policy (RSP) reflects our commitment of working together with our suppliers towards a long-term, sustainable and successful future for all parties. The RSP is instrumental in ensuring we deliver our business objectives, while making a positive social impact on the lives of people in our supply chains around the world and reducing our environmental impact. The RSP includes a set of Mandatory Requirements which all our suppliers need to meet to be able to do business with AkzoNobel. Beyond this, we encourage our suppliers to move from the mandatory requirements to good best practice. AkzoNobel is committed to working with its suppliers on this journey of continuous improvement. We strongly believe that this journey will benefit both AkzoNobel and our suppliers – by helping communities and the environment flourish, we'll create the right conditions for sustainable business growth.

2. Scope of this policy

This policy covers all direct suppliers with procurable spend across all procurement categories in those regions where we buy materials or services at AkzoNobel.

We expect our suppliers to apply the minimum requirements as outlined in this policy under paragraph 4 and to take best efforts to ensure that their suppliers also adhere to this policy.

3. Sustainability topics covered by this policy

AkzoNobel is committed to making a positive social impact on the people in our value chain and reducing our environmental impact globally.

We've identified sustainability topics that have an impact on both the social and environmental areas of our value chain that we expect our suppliers to address. These topics are anchored in internationally recognized standards that AkzoNobel is committed to.

In § 4 we share what **we expect in detail** from our suppliers on these topics when doing business with AkzoNobel. In § 5 we explain how we monitor adherence to those topics.

Area	Sustainability topics
<p>Human rights and working conditions</p> <p>As part of our core principles and in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), we're committed in our operations and across our value chain to respecting all internationally recognized human rights as set out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.</p> <p>We support the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. We expect all our suppliers to respect human rights and apply equivalent principles.</p> <p>We expect that our suppliers not only respect human rights in their own operations, but also request the same from their suppliers.</p>	<ul style="list-style-type: none"> • Employee health and safety • Minimum and living wages • Working time • Modern slavery • Diversity, discrimination and harassment • Freedom of opinion and association • Facilities and dormitories • Use of security forces • Unlawful eviction • Grievance • Sub-contractors
<p>Environmental protection and climate change mitigation</p> <p>Our suppliers must comply with all relevant environmental laws and ensure that the necessary permits are in place. They're committed to the efficient use of raw materials, energy and other natural resources while minimizing waste, emission and noise. They care about the communities they operate in and listen to their concerns.</p> <p>Since our suppliers have a significant impact on our carbon footprint, we expect efforts to reduce the carbon footprint of their own operations and engage with their upstream value chain to do the same.</p>	<ul style="list-style-type: none"> • environmental protection • Special conventions • Climate change mitigation
<p>Responsible sourcing of minerals and agricultural materials (TierN management)</p> <p>AkzoNobel conducts in-depth research into its raw materials portfolio and prioritized high-risk supply chains, based on publicly available information by NGOs and government agencies.</p> <p>We request suppliers who deliver materials that a potential impact on human rights (resulting from the above research) to disclose the country of origin of the mines, processors, smelters and/or agriculture farms where their materials (or part of it) comes from, and to ensure that controls are in place to protect human rights.</p> <p>Our due diligence process is based on the required legislation, Organization for Economic Cooperation and Development (OECD) Guidance for Responsible Mineral Supply Chains and the United Nations Guiding Principles on Business and Human Rights (UNGPs).</p>	<ul style="list-style-type: none"> • Human rights due diligence

<p>Integrity and compliance</p> <p>We expect our suppliers to conduct business to the highest ethical standards.</p>	<ul style="list-style-type: none"> • Business ethics
---	---

4. What do we expect from our suppliers?

In this chapter, we address the minimum requirements that all our suppliers need to meet in order to do business with us. Beyond this, we encourage our suppliers to continuously improve above these minimum requirements towards good and best practice. Although these efforts are at the suppliers' sole risk and cost, with our Together for Sustainability (TfS) membership we support our suppliers on this journey. Read more about this in chapter 5.

4.1 Employee health and safety

⇒ Objective: Prevent the risk of occupational health and safety incidents (e.g. from any chemical, biological and physical hazards and risk) to people at our suppliers.

Minimum requirements:

- A clear and effective **Health and Safety Policy** should be in place, which is communicated to all employees. It should be a living document and include qualitative and/or quantitative targets that address health and safety issues
- Ongoing **safety training** is provided to all personnel, including managers, supervisors, workers and security guards
- All employees and other people who enter suppliers' premises are properly informed about the inherent dangers of the workplace and are provided with adequate knowledge and personal protective equipment to avoid such dangers
- Necessary technical and organizational **protective measures** are provided to mitigate health and safety risks in the workplace, as well as appropriate **personal protective equipment (PPE)**. Seriousness, potential effects and substantial danger for employees should be validated
- **Emergency preparedness and response scenarios** and procedures are expected for mitigation, responding to and recovering from an emergency. This includes planning, training, conducting drills, testing equipment and coordinating activities
- To have an **incident management and reporting system** established covering, for example, certain types of incidents, reporting lines, consequences and corrective actions required

Good/best practice:

- Occupational health and safety policies and procedures are part of an overall HSE&S management system
- HS management systems undergo regular internal and external audits following international management standards for health and safety, such as ISO 45001
- Regular health and safety risk assessments take place to systematically identify and evaluate potential impact of operational tasks or conditions of employees' health and safety, including corrective action plans
- The structural integrity and fire safety of work sites are specifically assessed and updated periodically
- Equipment is designed and maintained based on internationally acknowledged standards to ensure appropriate machine and process safety
- Workplace exposure monitoring programs are implemented to ensure that workplace exposure limits are met to prevent negative health effects to employees
- Occupational health and safety committees are created, and their roles are clearly understood by all workers and managers

4.2 Minimum and living wage

⇒ Objective: Remuneration must comply with laws while being fair and just. Overtime is compensated and leave is offered as required.

Minimum requirements:

- The minimum salary paid by the supplier complies with applicable legal minimum wage or the appropriate prevailing industry standards, whichever is the higher
- Pay slips are provided to employees
- Payment of wages and salaries is made at least once per month
- Other than legally mandated deductions, all other deductions from wages are made only with the express and written consent of the workers
- Overtime is compensated (money, time) according to national law
- Is it ensured that there are no unjustified deductions made from wages, e.g. for required safety protection equipment, medical expenses, transport, accommodation, meals, training and disciplinary measures?

Good/best practice:

- The minimum salary paid by the supplier provides the employee with a basic salary that allows for making a living according to local standards (living wage)
- There's a system of periodic assessments in place to ensure equal pay for equal work

4.3 Working time

⇒ Objective: To prevent excessive working time of people

Minimum requirements:

- Clear policies are implemented regarding regular and overtime of work, with defined procedures for deciding on overtime and securing worker consent
- The policy shall ensure compliance with national laws or the ILO convention 1:
 - The weekly average working time of 48 hours in normal cases may not be exceeded
 - The total hours worked in any seven-day period, including voluntary overtime, shall not exceed 60 hours, except temporarily in cases where all the below requirements are met:
 - It's allowed by national law
 - It's allowed by a collective agreement freely negotiated by a workers' organization representing a significant portion of the workforce
 - Appropriate safeguards are taken to protect the workers' health and safety
 - The supplier can demonstrate that exceptional circumstances apply, such as unexpected production peaks, accidents or emergencies
- Working hours are recorded
- Working hours and remuneration must comply with laws, while being fair and just
- Overtime is compensated and leave is offered as required

Good/best practice

- All overtime is paid at an appropriate premium rate according to law or to prevailing industry standards, **whichever is the higher**
- Peak periods are planned in a way to avoid excessive overtime
- If sufficient workers cannot be hired, new working time arrangements are explored to ensure that overtime is the exception rather than the rule
- Work time arrangements allow for a good work-life balance

4.4 Modern slavery

⇒ Objective: Suppliers to ensure that people are not employed against their will, transported for exploitation, engaged in slavery or servitude, nor deprived of their rights. Legal minimum age requirements as outlined in the relevant ILO conventions and the laws of the countries of operation are adhered to and children under the age of 16 are not employed.

Minimum requirements:

- Policy/processes are in place to ensure that no child under the age of 16 is employed
- Policy/processes are in place to ensure that young workers under 18 years of age are exempt from overtime, night work and hazardous work
- Policy/processes are in place to ensure that young workers under 18 are not harmed regarding health, safety, security, or physical/psychological integrity
- Written contracts of employment for every directly employed worker are in place and a copy of the contract is provided in a language they can understand

- No payment of recruitment fee. No money (deposit, credits) of supplier's employees is kept as a condition of employment in the company. The supplier ensures that credits don't create dependencies for the workers
- There are hiring policies, procedures and trained staff to ensure that workers are entering employment freely and equally and are never prevented from leaving if they so wish
- Policy/processes are in place to ensure that recruiters comply with local labor laws of the country in which the recruitment takes place
- Original documents of the employees must not be in the possession of the company for a medium or long-term period, but only for as long as the company needs them for administrative purposes
- All employees in the company are free within the legal framework, and upon discussions with their employer, to terminate their employment on their own decision. Employees are informed about the conditions of contract termination
- An age verification system is in place to ensure that no children under the age of 16 are employed

Good/best practice:

- To the extent possible, workers are hired directly and transparently, or only through recruitment agencies that have developed policies and strategies to combat trafficking and forced labor
- Policies, procedures and training are regularly reviewed to ensure that they're effective in preventing forced labor

4.5 Diversity, discrimination and harassment

⇒ **Objective:** The people our suppliers deal with are treated with dignity and respect. Our suppliers don't harass or discriminate, whether through culture, nationality, race, religion, gender, political preference, disability, association, sexual orientation or age.

Minimum requirements:

- A policy exists that explicitly prohibits workers and agents from the following: harassment and discrimination in hiring, promotion, equal pay, benefits, and training based on race and/or color, sex, religion, political opinion, national extraction, age, HIV/AIDS status, disability, nationality, sexual orientation, workers with family responsibilities and trade union memberships or activities
- People are hired based on individual skills and qualifications and the supplier does not ask applicants questions that are discriminatory in nature or irrelevant for carrying out job tasks and does not ask job applicants about pregnancy status or requests pregnancy testing
- The supplier has an internal policy communicated to all employees that clearly and strictly forbids any form of verbal, physical or psychological threats, abuse or harassment in the company

Good/best practice:

- Selection criteria for all human resources decisions are objective and transparent and controls are in place to prevent arbitrary decisions
- Staff members responsible for hiring, paying, training, promotion, disciplining and terminating workers are trained to avoid discrimination in the exercise of their duties
- All workers and managers are trained to recognize and prevent harassment, abuse and other forms of intimidation

4.6 Freedom of opinion and association

⇒ Objective: Individual rights to freedom of opinion and association, including the right to collective bargaining, are respected.

Minimum requirements:

- Workers shall have the right to freedom of association and the right to conclusion of collective bargaining. Except countries where this is legally not allowed
- Employees are engaged on safety and health issues through unions, worker committees or any other worker voice mechanism

Good/best practice

- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining
- Qualitative objectives and/or quantitative targets that address main career stages i.e. recruitment, evaluation, training and management of layoffs.

4.7 Facilities and Dormitories

⇒ Objective: To ensure that the supplier provides unlimited access to clean drinking water during working hours and adequate sanitary facilities.

Minimum requirements:

- The supplier provides unlimited access to free clean drinking water during working hours
- The supplier provides adequate sanitary facilities e.g. low risk of infection, fixed equipment to wash hands
- If living accommodation/dormitories are provided for employees or contractors, the supplier ensures they're safe and clean and meet relevant basic requirements

4.8 Use of security forces

⇒ Objective: When private or public security forces are used for the protection of the supplier's premises or projects, the suppliers ensure and monitor the prevention of the use of illegal and disproportionate violence, and that the right to organize and the freedom of association is respected

Minimum requirements:

- If armed security is used at the supplier's location, procedures for force and firearms are in place that align with best practices expressed in the UN Basic Principles on the Use of Force and Firearms

4.9 Unlawful eviction

⇒ Objective: To be compliant with the prohibition of unlawful eviction and the prohibition of unlawful taking of land, forests and waters in the acquisition, development or other use of land,

forests and waters, the use of which secures the livelihood of a person (including indigenous people)

Minimum requirements:

- In case of acquisition, there's an assessment process to evaluate the potential direct and indirect risks and impacts related to the physical and/or economic displacement of people
- When entering private lands to explore or do any work, the supplier or its sub-contractors ensure that it has obtained all the correct permissions
- When purchasing or leasing property, the supplier identifies all legitimate property interests and ensures that the seller/lessor of the property is the true owner of the land
- If physical and/or economic displacement cannot be avoided, the supplier must develop a resettlement action plan (RAP) or similar, in line with IFC Performance Standard 5

4.10 Grievance

⇒ Objective: Our suppliers provide their employees and other interested parties with a mechanism to raise concerns about violation or potential violation of laws and the values provided in this policy. These concerns will be addressed in a fair and transparent way. Our suppliers protect confidentiality and prohibit retaliation against those raising the concern.

Minimum requirements:

- Formal disciplinary procedures established and communicated to all employees and management
- Keeping records of actions taken and grievance procedures

Good/best practice:

- A disciplinary policy is in place to respond to cases of misconduct of employees (including management). This policy must be clearly communicated to all employees
- Reporting channels established for anonymous reporting of misconduct and violations or issues of concern (e.g. whistleblower hotline)

4.11 Sub-contractors

⇒ Objective: To ensure that any party our suppliers engage on behalf of AkzoNobel, or who perform work for the benefit of AkzoNobel, will be made aware of the values in this Code and will be held to act in accordance with them.

Minimum requirements:

- Request the sub-contractor to sign the AkzoNobel Code of Conduct or equivalent
- To make the sub-contractor aware of this policy

Good/best practice:

- Sub-contractors are assessed and audited by the suppliers
- Formal contracts are in place to ensure compliance with AkzoNobel's Code of Conduct and Sustainable Procurement Policy

4.12 *Environmental protection*

⇒ Objective: Our suppliers comply with all relevant environmental laws and ensure that the necessary permits are in place. They're committed to the efficient use of raw materials, energy and other natural resources while minimizing waste, emissions and noise. They care about the communities they operate in and listen to their concerns. Our supplier is expected to establish and follow procedures for emission prevention, measurement and control. It's expected that run-off of chemicals or any other hazardous substances into streams, groundwater, soil or air do not occur. If contamination is present, it's not an immediate issue if the site has management plans in place to mitigate or reduce impact. There are different requirements depending on the industry our supplier is dealing with:

A) Suppliers operating in **manufacturing industries** or industries dealing with **hazardous or dangerous goods** (including wholesaler or distributors)

Minimum requirements:

- All necessary current and valid legal permits are held for its supplier's operation
- Training is provided to all relevant personnel to ensure knowledge and compliance with all necessary legal permits
- An environmental policy sets standards and targets for improvement
- Processes are in place to ensure compliance with environmental regulation in the areas of waste, emissions, water and wastewater, energy, land use and biodiversity, soil and groundwater
- There's a person responsible for environmental issues
- There's some awareness of the environmental impact of site activities, including sources of unplanned releases that may impact the environment
- Equipment, procedures and other system elements are in place to control significant environmental impacts
- Wastewater is treated internally or externally before being discharged to surface water or underground wells
- Containers are stored in adequate condition (not rusted or damaged) to ensure leaks don't occur; in case of (hazardous) waste, secondary containment is in place to prevent contamination of the environment if a leak occurs
- Waste resulting from the activities performed is disposed of according to applicable regulations

Good/best practice:

- Environmental management system accredited to ISO14001, with metrics led improvement plans and regular auditing
- Environmental impact control devices including secondary containment and pavement underneath material transfer stations and storage facilities are assessed for critical status and, where relevant, registered, inspected and maintained as "critical" equipment. Registration and inspection records exist
- The site manages utilities consumption by measuring consumption and setting annual targets for energy conservation and waste reduction. The site has completed a sustainable water risk assessment and, if relevant, developed an improvement plan
- Primary (such as vessels, pumps and pipes) and secondary (such as bunds and building floors) containment audits/inspections are conducted regularly, and improvement plans are identified and implemented
- All environmental risks are assessed and controlled. There's a proactive approach to reducing the site's environmental impact

- Sustainability practices are embedded across the supplier's operations and activities which aim to: (i) Reduce the generation of waste and achieve zero landfill; (ii) Reduce the consumption of water; (iii) Protect and enhance nature and biodiversity; and (iv) Halt deforestation

B) Suppliers operating in **non-manufacturing industries, not dealing with hazardous or dangerous goods** (e.g. service companies)

Minimum requirements:

- All necessary current and valid legal permits are held for its supplier's operation
- Training is provided to all relevant personnel to ensure knowledge and compliance with all necessary legal permits
- An environmental policy sets standards and targets for improvement
- Actions are in place for waste management (reduction of waste, employee training on waste reduction)

4.13 **Specific environmental conventions**

⇒ Objective: While we expect that our suppliers comply with all relevant environmental laws, we want to specifically outline the supplier compliance with the below conventions:

- **Basel Convention** on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal
- **Mercury prohibitions** (Minamata Convention Section 2, (3) 1, 2, 3)
- **Persistent Organic Pollutants prohibitions** (POPs Convention Section 2,(3) 4, 5)

Minimum requirements:

- Actions in place to restrict the transboundary movement of hazardous waste
- Policies exist on materials, chemicals and the movement of hazardous waste to ensure compliance with above conventions
- Policies exist on materials, chemicals and waste to ensure compliance with this legislation

4.14 **Climate change mitigation**

⇒ Objective: Our supplier should take remediating actions to reduce carbon emissions and/or offer lower carbon feedstocks in line with the Paris Agreement, which aims to limit global warming to maximum of 1.5 degrees Celsius pre-industrial levels.

Minimum requirements for raw material and packaging suppliers:

- Monitor/routinely assess emissions of GHGs associated with site processes/activities, fuel use for on-site or off-site transportation, agricultural activities etc.
- Assess and measure Scope 3 emissions
- Set Scope 1 and 2 emission reduction targets

Good/best practice for raw material and packaging suppliers:

- Sustainability practices are embedded across the supplier's operations and activities which aim to reduce greenhouse gas emissions and achieve carbon neutral solutions
- Calculate Product Carbon Footprint (PCF) for key products in line with the TfS PCF guideline

- Calculate PCF with primary data to the highest degree possible
- Engage with upstream supply chain partner on decarbonization plans
- A time-bound action plan in place to reduce Scope 3 emissions
- Where applicable, offer materials based on certified bio-based or biomass balance at reasonable cost

Note: For suppliers with a high impact on our carbon emissions, the “good/best practice” is becoming a minimum requirement over time.

4.15 **Responsible sourcing of minerals and agriculture products**

- ⇒ Objective: Ensure that human rights, as outlined in the Universal Declaration on Human Rights and the International Labor Organization (ILO), are respected **across the entire value chain**.

Minimum requirements:

- Suppliers to perform **human rights due diligence**, as outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs):
 - Commit to respect human rights. Publicly support the UNGPs
 - Identify and assess risks in the supply chain in regard to potential harm to human rights
 - Increase traceability and transparency on mines, farms, processors and/or smelters for products with potential impact on human rights
 - Audit “control point/point of transformation” (mines, farms, processors and/or smelters)
 - Increase leverage

Good/best practice:

- Human rights policy in place
- Responsible sourcing policy in place
- Participating in industry associations to increase leverage
- Training and guiding upstream suppliers and own employees

4.16 **Business ethics**

- ⇒ Objective: Our suppliers must conduct business fairly and with integrity, in compliance with national and international legislation.

Minimum requirements:

- Honest business conduct: no offering, promising, giving, accepting, soliciting money, gifts or other advantages as an inducement; acting illegally or inappropriately (including facilitation payments)
- Business decisions not influenced by gifts or hospitality
- Compliance with fair competition and anti-trust laws
- Business decisions not influenced by conflict of interest. Timely disclosure of potential conflict of interest
- Internal controls to detect, prevent and respond to fraud and money laundering
- Accurate and transparent data keeping
- Appropriate use of (personal) data sources

Good/best practice:

- Anti-bribery, gifts and hospitality, customer loyalty programs and competition law compliance policies, procedures and guidance available
- Incident management framework available, including disciplinary policy

- Mandatory online and face-to-face anti-bribery and competition compliance law training and (internal and external) expert anti-bribery and competition law counsel and periodical self-assessment of compliance available

5. Monitoring of supplier's sustainability performance

Our supply chains are complex and long. While the sustainability topics covered under § 3 and § 0 applies to all our suppliers, we prioritize suppliers for our monitoring, evaluation and improvement programs, based on their risk and strategic importance to us.

As a member of [Together for Sustainability \(TfS\)](#), an initiative of the chemical industry for a more sustainable supply chain, we utilize their programs and partners to increase our leverage. TfS has been providing the infrastructure for standardized supplier assessment and audits for many years. In 2022, TfS launched the TfS PCF guideline for calculating Product Carbon Footprint (PCF), and since 2024, the TfS PCF sharing solutions were featured by SiGREEN for product carbon footprint.

In addition, through its academy, TfS offers access to more than 200 sustainability courses for our buyers and suppliers. You can learn more in § 6.

5.1. Business Partner Code of Conduct

All suppliers with an annual spend of more than €1,000 must sign the AkzoNobel [Business Partner Code of Conduct](#), or may refer to their own in case it's equivalent to ours, subject to our legal counsel approval.

5.2. Anti-bribery and anti-corruption (ABAC)

For new suppliers and existing suppliers in high-risk categories, and located in countries with a low corruption index score (Transparency International), we perform an anti-bribery and anti-corruption screening, and take appropriate mitigation measures where required.

5.3. Supplier CSR program

AkzoNobel verifies its suppliers' CSR performance on topics mentioned in § 3 by requesting assessment performed by EcoVadis, a partner of Together for Sustainability and AkzoNobel.

By setting a threshold of above €250,000, we aim to cover 85% of our spend with suppliers having an EcoVadis assessment in place (or equivalent) and that are either medium or high risk, or of strategic relevance to us.

Suppliers are in scope for the EcoVadis CSR assessment program if they fulfill the criteria below:

- Suppliers with a spend \geq €250,000, <€1 million
If they come out as medium high, high or very high risk in our (at least) annual risk analysis supported by third party tools. The risk analysis looks at industry, country risk and considers other procurement risk areas, such as spend levels and criticality of products
- Suppliers above €1 million spend are requested to perform an assessment, irrespective of their risk profile

Minimum requirements for suppliers considered for the EcoVadis program:

- Suppliers are expected to reach an EcoVadis overall score of 45 and a labor and human rights score of 50
- If the minimum thresholds stated above are not reached, annual re-assessments must be performed until the target scores are met
- Suppliers have three years to reach minimum thresholds
- In addition, suppliers must complete high priority action plans on AkzoNobel material topics and/or topics that are in scope of local legislation as per deadline provided in the corrective action plan request

5.4. TfS audit program

Complementary to the EcoVadis assessment, we perform TfS audits on raw material and packaging suppliers' locations in high-risk industries and/or regions. The audits are an in-depth inspection by third party auditors to ensure that global policies and procedures are implemented in practice, and that our supplier's "walk the talk" on their commitments.

See also § 8.1

5.5. Supplier decarbonization program

Suppliers with a significant impact on our upstream carbon emissions are invited to our Supplier Sustainability Balanced Scorecard (SSBS) program and are requested to share their product carbon footprint (PCF) through the TfS PCF sharing solution featured by SiGREEN.

Suppliers in scope of this program are requested to disclose environmental information and reduction targets and offer low carbon products.

5.6. Human rights due diligence (TierN management)

AkzoNobel has conducted in-depth research into its raw material portfolio and prioritizes high-risk supply chains based on publicly available information by NGOs and government agencies. This results in a list of materials that we buy directly, or are included in the raw materials we buy and which could have a potential impact on modern slavery.

For these materials in scope, we perform **annual human rights due diligence** surveys at our suppliers to obtain transparency on the country of origin of these materials. If a supplier confirms that a material is sourced from a country with a potential high risk of modern slavery for this supply chain, we request our supplier to provide the controls that are in place or, if absent, request that a TfS audit or equivalent audit is performed that focuses on social criteria.

To learn which materials are in scope for our human rights due diligence, please see our latest annual report (Human rights section).

6. Supplier trainings

As a member of Together for Sustainability, we offer our suppliers and procurement teams access to the TfS academy, a capability-building hub to learn about the most pertinent and trending sustainability topics.

The TfS academy currently offers 340 courses in ten languages (English, Chinese, Spanish, Portuguese, Japanese, Vietnamese, Bengali, French, Italian and Hindi), covering the key topic areas listed below, as well as overarching information on working with TfS:

- Decarbonization
- Health and safety
- Environment
- Sustainable procurement
- Labor and human rights
- Management
- Governance

Suppliers can access the TfS academy via this link: <https://www.tfs-initiative.com/tfs-academy>

7. Grievance process for our suppliers

If anyone suspects that our Business Partner Code of Conduct or this policy is being breached, we encourage you to let us know. You can raise your concern by using our [SpeakUp! channel](#), which is **available to everyone**.

You can use SpeakUp! in three different ways:

- Call the SpeakUp! helpline
- Use the SpeakUp! website
- Send a report to SpeakUp! by e-mail or post

For more information about how you can file a SpeakUp! report, visit our [Code of Conduct page](#) or our externally operated [SpeakUp! website](#). Applying certain key principles, SpeakUp! is designed to provide you comfort in raising your concern. There will be no repercussions against anyone for raising their concern in good faith, even if the allegations turn out to be unfounded.

Your report will be treated confidentially and shared only with those who have a need to know. You can file a report anonymously if you want to, although we encourage you to disclose your identity to facilitate the investigation and communication.

We report the results of our SpeakUp! mechanism every year. They can be found in our annual report.

8. Frameworks

8.1. Together for Sustainability (TfS)

TfS audit:

The TfS audit covers the sustainability topics shown below:



The following external references have been used to develop the **TfS audit questionnaire**:

- United Nations Global Compact (UNGC)
- Safety and Quality Assessment System (SQAS of the European Chemical Industry Council (CEFIC))
- Responsible Care Global Charter of the ICCA
- International Labor Organization (ILO)
- Declaration on Fundamental Principles and Rights at Work, as well as other key ILO statements
- Conventions on Labor Standards
- International Organization for Standardization (ISO)
 - ISO 26000: Guidance on Social Responsibility
 - ISO 9001: Standard for Quality Management Systems
 - ISO 14001: Standard for Environmental Management Systems
 - ISO 19011: Guidelines for Quality and/or Environmental Management System Auditing
- OHSAS 18001: Occupational Health and Safety Assessment Series
- Social Accountability International, SA8000 Standard
- United Nations, Universal Declaration of Human Rights
- United Nations, UN Convention against Corruption
- Organization for Economic Co-operation and Development, OECD Guidelines for Multinational Enterprises

EcoVadis assessment:

The EcoVadis assessment considers a range of sustainability issues that are grouped into four themes:

- Environment
- Labor and human rights
- Ethics
- Sustainable procurement

The sustainability issues are based on international sustainability standards, such as:

- Ten Principles of the UN Global Compact
- The International Labour Organization (ILO) conventions
- The Global Reporting Initiative's (GRI) standards
- The ISO 26000 standard
- The CERES Roadmap
- The UN Guiding Principles on Business and Human rights.

8.2 International sustainability standards AkzoNobel is committed to

- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- Universal Declaration on Human Rights
- UN Guiding Principles on Business and Human Rights
- Science Based Targets (SBTi)

9. Ownership of this policy

AkzoNobel's Chief Procurement Officer (CPO) owns this policy. It was adopted on 15th November 2024 and will be reviewed annually. Changes may be made at any time based on any additional national or legislative guidance or amended organizational priorities.

Appendix

1. Links to policy statements

- [Biodiversity](#)
- [Supplier Code of Conduct](#)
- [Circular economy](#)
- [Climate change](#)
- [Conflict minerals](#)
- [Discrimination and harassment](#)
- [Diversity, equity and inclusion](#)
- [Ethical animal testing](#)
- [Human rights position paper](#)
- [Mica minerals](#)
- [Modern slavery statement](#)