



SPC Supplier Code of Conduct

At SPC, sustainability, traceability, and compliance are fundamental to our business. We believe that leading the renewables industry involves not only supplying renewable feedstocks but also adopting a renewable mindset, which includes conducting business with integrity and ethical standards. This commitment extends to our business partners as well. This Supplier Code of Conduct ("Code") details the requirements for SPC's suppliers ("Suppliers") in their business dealings with SPC and interactions with their own employees, suppliers, and stakeholders.

"Supplier" encompasses any individual or legal entity providing SPC with products or services, including their 1st tier suppliers, contractors, and business partners involved in delivering products or services to SPC (collectively "Supply Chain"). Suppliers will ensure their 1st tier suppliers, contractors, and business partners adhere to the minimum requirements of this Code and that this Code is communicated to them.

Compliance with Laws: Suppliers will comply with all laws and regulations applicable to its operations. Should a requirement of this Code contradict national laws or regulations, Suppliers will comply with whichever is more stringent.

Business Conduct

Integrity - Maintain a zero-tolerance policy against bribery and corruption. Have measures in place to prevent all forms of bribery and improper payments (including facilitation payments and kickbacks) aimed at obtaining or retaining business, or securing any other improper advantage.

Gifts – Do not provide SPC employees with gifts or hospitality that could influence, or appear to influence, their decisions regarding the Supplier

Fair Competition - Compete fairly and adhere to all applicable anti-trust laws and regulations. Implement procedures to prevent anti-competitive practices by directors and employees.

Compliance with Laws and Regulations - Comply with all laws and regulations concerning anti-money laundering, privacy, and economic and trade sanctions

Conflicts of Interest - Avoid conflicts of interest between the Supplier and SPC, including interactions with SPC employees that could compromise their duty to act in SPC's best interests. Disclose any potential or existing conflicts of interest to SPC.

Human and Labor Rights: SPC respects the rights enshrined in the Universal Declaration of Human Rights and the fundamental rights in the core conventions of the International Labor Organization which are used to inform and shape this section of the Code and may be a useful source for additional information. Suppliers are expected to respect the same rights for all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

Working Hours – Suppliers will follow applicable laws regarding working hours, minimum wages, overtime, sufficient breaks and rest time, sick leave and annual holidays, as well as parental leave and mandatory benefits (e.g. social security), and have appropriate records of these in place.

Child Labor Avoidance – Suppliers will not employ workers younger than 15, protect workers of ages 15-17 from work that could harm their health, and establish systems to ensure fulfillment of and follow up of these requirements.

Elimination of Forced Labor – Suppliers will not use any compulsory or forced labor and ensure that recruitment fees and associated costs are not borne by workers.

Informed Workforce – Suppliers will ensure all employees are made aware of the key terms of their employment prior to commitment to work.

Non-Discrimination - Suppliers will provide equal opportunity and treatment in employment, without regard to race, color, religion, sex, political opinion, national extractions, social origin, or any other similar distinction which is not based on the inherent requirements of the work.

Non-Harassment - Suppliers will not tolerate any type of harassment of its employees whether direct or indirect, physical or verbal.

Fair Compensation – Suppliers will promote employees' material well-being by providing fair wages, benefits, and work hours in accordance with legal requirements.

Freedom of Association - Suppliers will recognize and respect employees' right to organize freely and bargain collectively as well as respect the right of workers to refrain from such activities, without fear of retaliation.

Health, Safety & Security: Suppliers will comply with all applicable laws and regulations to maintain a safe and healthy work environment. This includes providing workers with regular health and safety training in their primary language and consistently monitoring for potential risks and hazards that may impact health and safety of workers.

Environmental Impact: Suppliers will take proactive steps to address environmental challenges and promote greater environmental responsibility. This includes implementing procedures to minimize adverse environmental impacts of their operations and continually improving environmental performance.

Suppliers will obtain and maintain all required environmental permits, approvals, and registrations and comply with all associated operational and reporting requirements.

Suppliers will monitor, control, and appropriately treat wastewater, air emissions, and waste generated from its operations (including hazardous waste) in compliance with applicable laws and regulations.

Suppliers will consider the climate impact of their operations and, where reasonable, undertake measures to reduce greenhouse gas emissions.

Compliance Assurance: Suppliers will ensure that all members of the Supply Chain are aware of, and comply with, the requirements of this Code.

Suppliers will annually certify to SPC that they comply with this Code and will provide evidence of compliance upon reasonable request.

Suppliers that knowingly violate the law or seek to have SPC employees violate the law or this Code, will be subject to appropriate sanctions, including the possible cancellation of all current and future contracts.

Acknowledgement: Supplier acknowledges and agrees to abide by SPC's Supplier Code of Conduct and to ensure that Supplier's employees, officers, directors, agents, suppliers, and representatives are aware of the Code and the requirements and abide by this Code for the provision of goods and services to SPC.

SIGNED EFFECTIVE this ____ day of _____ 20____.

Name: _____

Title: _____