



	Approved by: BoD	Date:	Id/№	Rev.	Page: 1/7
Supplier Code of Conduct	Author:	Date:	Document type: Manuals and Policies		



SUPPLIER CODE OF CONDUCT

Table of Content

- I. Introduction
- II. Labour and Human Rights
- III. Health and Safety
- IV. Ethics
- V. Environment
- VI. Monitoring, Measuring and Reporting

References: UN Universal Declaration of Human Rights, The International Labour Organization Convention, The UN Convention against Corruption, Rio Declaration on Environment and Development, ISO26000, LBMA Responsible Gold Guidance, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, US Dodd-Frank Act 1502, EU Conflict,

Minerals Regulation, UK Modern Slavery Act, UN Basic Principles on the Use of Force & Firearms by Law Enforcement Officials, UN Code of Conduct for Law Enforcement Officials, International Human Rights Standard for Law Enforcement, Voluntary Principles on Security and Human Rights, OSCE Handbook of Best Practice on Small Arms and Light Weapons, OHSAS 18001, ISO14001, Basel Convention, CLP, REACH, ROHS, IWIC, UK Bribery Act.





I Introduction

The company KA was founded in 2008. The principal activity is the production of the wooden pallets all forms and sizes (also we have big experience in the production of non-standard pallets according to customer's drawings), wooden boxes, boards of the pallets. Also we sell plastic pallets, packing cases Big Box, various plastic packages (sand boxes, dust-bins, various barrels, containers, IBC containers), wide range of the packing sheet, plastic transport packaging – freezing packing, various labels for the marking of the goods: total more than 3000 kinds of the products, which can be found on our website www.ka.ee.

KA strongly believe in increasing business while being a good business partner to Customers and Suppliers by striving to be a sustainable link in the value chain.

KA is committed to long-term sustainable development and seek Suppliers whose policies regarding ethical, social, and environmental issues are consistent with our own.

The purpose of the Code of Conduct document is to make the Suppliers aware of our commitments and expectations.

The Code of Conduct, hereinafter referred to as the "CoC", is based on internationally agreed standards, primarily the ten principles of United Nations Global Compact, covering human rights, labor rights, environmental care and anti-corruption.

The "CoC" applies to all KA counterparties; including without limitation suppliers, subcontractors, joint venture partners, agents, distributors and employees of all of the above mentioned, regardless if they are permanently employed, temporarily contracted or directly employed. The above-mentioned counterparties are hereinafter referred to as "Suppliers".

The principles set out in this "CoC" are minimum requirements. Suppliers must always comply with applicable international and national laws, regulations and conventions. If applicable international and national laws, regulations and conventions are stricter than this "CoC", they shall prevail.

Non-compliance with this "CoC" may have negative impact on the business relationship. KA reserves the right to terminate the contract with any Supplier who itself or in any part of their value chain, has materially breached this "CoC".

II Labour and Human Rights

- Suppliers to KA must uphold the human rights of workers, to treat them with dignity and respect as understood by the international community.
- Suppliers shall comply with applicable laws, collective bargaining agreements and industry standards on working hours, leave and public holidays.
- Suppliers shall not use, or support any use of, child labour or other child exploitation. No person younger than the age for completing compulsory education or younger than 15, shall be used as labour. Labour under 18 years of age shall not work night shifts or perform heavy or hazardous work.



- Suppliers shall not discriminate in hiring and employment practices. Discrimination includes but is not limited to ethnicity, caste, national or social origin, religion, age, disability, gender, marital status, sexual orientation or identity, union membership or political opinion.
- Suppliers shall ensure that employees are paid a wage which should at least meet national or industry minimum standards and at least be sufficient to cover the basic needs of the employee and provide some discretionary income. Suppliers shall provide, or otherwise ensure that its employees have access to, adequate social insurance.
- Suppliers shall inform all employees of their employment conditions. All employees are entitled to written employment contracts in a language understandable to the employees.
- Suppliers must not participate in, or benefit from, any form of forced labour including bonded labour, forced prison labour, slavery, or human trafficking, in accordance with the ILO-conventions. Workers must have the freedom of movement during their employment, not accepting forcing people to work against their will or under pressure from a threat, harassment, abuse or punishment.
- Suppliers shall act responsibly towards neighboring society, safeguard the rights of indigenous people and landowners and treat all members of society fairly and with dignity and respect.
- Suppliers shall not tolerate, profit from, contribute to, assist with or facilitate in any way to: war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

III. Health and Safety

- Suppliers shall be committed to creating safe working conditions and a healthy work environment for all of their workers. Health and safety policies and procedures must be established, communicated and followed.
- Suppliers shall comply with all the applicable health and safety related laws and regulations. Workers shall never be disciplined for refusing to work in an unsafe environment or for raising safety concerns. Procedures must be in place to identify, manage, record and report occupational injuries and illnesses appropriately.
- Suppliers must ensure that its workers are offered a safe and healthy working environment with adequate protection from fire, accidents and toxic substances. This includes, but is not limited to, preventive actions such as evacuation procedures, emergency training and drills, appropriate first-aid supplies, appropriate fire detection, suppression equipment and well-marked exit facilities.



V. Ethics

- Suppliers shall comply with all competition, anti-trust laws and legal regulations concerning bribery and corruption, financial crime and intellectual property rights.
- Suppliers shall ensure a zero-tolerance policy on bribery and corruption meaning that the supplier shall not, directly or indirectly through agents or consultants, participate in or endorse any corrupt practices, such as bribing or any other method, to unjustly influence public officials, the judiciary and/or private parties to gain improper advantage.
- Suppliers shall not engage in relations, activities or ventures where personal or other inappropriate relationship has or may influence a business decision.
- Suppliers shall have adequate procedures for preventing, detecting and tackling financial crime, including but not limited to fraud, extortion and money laundering, and to comply with trade sanctions.
- Suppliers shall be transparent and open regarding business transactions that are connected to KA to ensure compliance with this "CoC". Suppliers shall also monitor customers that material deriving from KA is sold to in order to ensure no connection or support to terrorist activities.
- Suppliers shall ensure that all legally required taxes, fees and royalties related to mineral extraction, trade and export are paid to governments. This includes ensuring that such payments are disclosed in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).
- Suppliers shall secure that all observations, discussions and written information received from KA are to be treated confidentially by the supplier, its employees and any third-party organizations appointed by either side.
- Suppliers must respect intellectual property rights and recognize the value of intellectual property such as patents, designs, pictures, trademarks, trade secrets and copyrights. Transfer of technology and know-how must be done in a manner that protects intellectual property rights.

V. Environment

- Suppliers must obtain, maintain and keep all required environmental permits and registrations and follow the operations and reporting requirements of such permits.
- Suppliers shall work towards reducing its environmental impact through its way of conducting business. This includes having an environmental management system, or as a minimum an environmental policy and a system including a risk assessment approach, to prevent, mitigate and control environmental damage from their operations.
- The most commonly prioritized aspects of environmental impact are; exploitation of natural resources, energy, fresh water, emissions to air and water, noise and dust, risks to cause soil pollution, waste disposal and product related aspects such as design, packaging and transportation.
- Renewable energy sources shall be promoted and water shall be purified and reused when possible. Waste shall foremost be recycled and otherwise sent for appropriate waste treatment to minimize environmental impact.



- Suppliers must comply with all national laws and regulations prohibiting or restricting specific substances. Suppliers shall consequently comply with material restrictions (RoHS, REACH) and
- continuously maintain records of relevant raw material declarations such as Material Data Sheets (MDS) or similar.
- Suppliers that deliver or buy products containing tin, tungsten, tantalite and gold to/from KA must have a clear policy in place regarding all conflict minerals.
- KA support ending the violence and human rights violation in the mining of certain minerals from a location described as a “conflicting areas” according to The Dodd–Frank Wall Street Reform and Consumer Protection Act, July 2010.
- Suppliers must follow the OECD Due Diligence Guidance for responsible Supply Chains of Minerals from Conflict- Affected and High-Risk areas, when sourcing from these areas. Specifically have an implemented a due diligence process which traces such minerals back to origin, and upon request, provide evidence of accuracy and validity of the minerals.

VI. Monitoring, Measuring and Reporting

- Suppliers shall ensure own compliance with the KA “CoC” and throughout the value chain. Suppliers shall have an appropriate process in place to verify compliance with the “CoC”. Suppliers shall participate in audits and provide KA with information and data (including self-assessments) to verify compliance with the “CoC”.
- KA, and any third party appointed by KA, shall have the right to access all sites of the Supplier and its sub-contractors to perform such audits.
- KA management wish to ensure that every effort is made to assure that KA maintain an excellent standard of conduct. Any noncompliance of the “CoC” must be reported to KA. Reports shall be made directly to the Senior Vice President Head of Sourcing, Logistics and IT.

Supplier Code of Conduct Compliance Commitment



We hereby confirm that we have received, read and understood the content of KA Code of Conduct.

We accept the provisions of KA Code of Conduct and take responsibility to ensure compliance and inform our concerned employees about the content as part of our regular standards and policies.

Signature: _____

Printed Name: _____

Acting as (Title): _____

Company (Name of Supplier's Company): _____

Date and place: _____

Completed and signed original document shall be sent to info@ka.ee

