

Business Partner Code of Conduct

OCI N.V.

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BUSINESS PARTNER CODE OF CONDUCT

1. Introduction

OCI promotes ethical business practices, sustainable agriculture and nutrient stewardship through its supply chain, which begins with sourcing natural gas and ends at our agricultural and industrial customers. We work diligently to ensure every aspect of our business operates optimally and promote best practices through our Business Partner Code of Conduct.

We seek to award business to business partners who share similar corporate values as OCI and are committed to act fairly and with integrity towards their stakeholders, who have adopted and promote the implementation of our or equivalent business principles as set out in this Business Partner Code of Conduct, and who observe the applicable laws of the country in which they operate.

It is the Business Partner's responsibility to maintain and enforce compliance within its supply chain. Failure to comply with internationally recognized standards, and the standards set forth in this Code of Conduct may result in the termination of the Business Partner's contract and relationship with OCI.

Business Partners in the context of this Code of Conduct means suppliers, distributors, agents, resellers and other third parties in our supply chain.

2. Ethical Practices

Business Partners are expected to:

- **Laws and regulations:** comply with all local, national, and international laws and regulations applicable to their operations
- **Antitrust and Competition Laws:** adhere to the principle of free enterprise and comply with antitrust and competition laws in the countries in which they operate
- **Bribery and corruption:** conduct their business free from any form of bribery, corruption, fraud, extortion, payment facilitation, gifts, entertainment, or other tangible or intangible methods of bribery
- **Conflicts of interest:** disclose and address any potential or confirmed conflict of interest to OCI
- **Confidential information:** maintain the confidentiality of information entrusted to them by OCI, except when disclosure is authorized or legally mandated
- **Data Privacy:** protect the privacy of individuals and the security of confidential assets and information in compliance with all applicable local laws, and to use, access and disclose personal information provided by or on behalf of OCI only for the purpose for which it was provided
- **Export Controls and trade regulations:** comply with applicable trade regulation laws and refrain from providing OCI with goods or services subject to national or international export control regulations. Business Partners shall implement integrity due diligence measures to screen their own business partners, customers, and vendors to ensure compliance with applicable laws and regulations concerning embargoes and sanctions

- **Whistleblowing:** have a policy and process for reporting of workplace concerns. The policy and process should be transparent and understandable and should protect reporting and participating individuals from retaliation

3. Responsible Conduct

Business Partners are expected to:

- **Environmental responsibility:** comply with all applicable environmental laws and regulations and promote sustainable business best practices in line with applicable laws and regulations
- **Sustainability:** have processes and policies in place to minimize their environmental footprint and prevent accidental releases of hazardous materials into the environment and adverse environmental impacts on the local community
- **Social Responsibility:** operate ethically and consider the environment when making business decisions. OCI encourages Business Partners to develop and use environmentally friendly technologies, products, and services

4. Human Rights and Working Conditions

Business Partners are expected to:

- **Discrimination and anti-harassment:** treat all people with respect and provide a workplace free of harassment or abuse of any kind, harsh and inhumane treatment, unlawful practices, or discrimination Hire employees and contract labour based only on each person's job-related competence
- **Minority rights:** protect minority groups' and indigenous peoples' rights, consult with local communities, and guarantee their right to free, prior and informed consent
- **Diversity and inclusion:** foster an inclusive culture, be inclusive and ensure that their work force employees and other stakeholders are treated with dignity and respect
- **Forced or child labor:** support the internationally proclaimed human rights and fight forced labour (including modern slavery and human trafficking), such as those set by the International Labor Organization (ILO) and the United Nations International Children's Emergency Fund (UNICEF)
- **Freedom of association:** respect freedom of association and collective bargaining rights in accordance with applicable laws and regulations
- **Health and safety:** provide a safe and healthy working environment in compliance with local, national, and international standards
- **Fair working conditions:** ensure fair working conditions in accordance with local wage and labor laws, and ensure compensation of living wage according to local living conditions

5. Reporting Suspected Misconduct

Any breach or concern related to this Code of Conduct should be reported to your OCI relationship manager immediately, allowing for joint verification of facts and remediation. Should you wish to remain anonymous, please contact OCI helpline Ethicspoint (www.oci.ethicspoint.com), which is managed by an independent provider and is available 24 hours a day, 7 days a week. OCI will not tolerate retaliation against any person for making a report or participating in an investigation of possible misconduct in good faith.