

## Supplier Code of Conduct for the Moldcell Group

Public Document

Approved: CEO of Moldcell SA

Date: 01.06.2024

### Supplier Code of Conduct for the Moldcell Group

#### 1. OBLIGATIONS OF MOLDCELL

Moldcell Company has committed to adhering to various international guidelines related to human rights, labor rights, anti-corruption, and environmental responsibility. These include:

- The UN Universal Declaration of Human Rights
- The International Labour Organization (ILO) core conventions
- The OECD Guidelines for Multinational Enterprises
- The UN Global Compact
- The UN Guiding Principles on Business and Human Rights
- The Children's Rights and Business Principles

These guidelines form the basis of the responsible business code approved by the Moldcell Company Board of Directors. The requirements set out in the responsible business code exceed legal requirements and apply to all employees, establishing how interactions with stakeholders should be conducted to ensure the highest level of ethics and business behavior.

#### 2. SCOPE AND DEFINITIONS

The Moldcell Supplier Code of Conduct sets out the requirements applicable to suppliers and other third parties doing business with Moldcell and its subsidiaries (hereinafter referred to as "Moldcell"). The terms and definitions used in this document are as follows:

- The term "**supplier**" includes suppliers and other third parties doing business with or on behalf of Moldcell, as well as their employees, subsidiaries, agents, affiliates, and subcontractors.
- The term "**employees**" includes employees and consultants, as well as other persons working under the supplier's supervision.
- The Moldcell Supplier Code of Conduct is hereinafter referred to as the "**supplier code**"
- The term "**must**" indicates a minimum requirement that must be met.
- The term "**should**" indicates requirements that are recommended and objectives toward which we encourage all suppliers to aspire.

In addition to the requirements set out in the supplier code, we may include additional sustainability requirements in relevant contracts, depending on deliveries to Moldcell.

## **Supplier Code of Conduct for the Moldcell Group**

Public Document

Approved: CEO of Moldcell SA

Date: 01.06.2024

### **3. REQUIREMENTS**

#### **3.1 GENERAL REQUIREMENTS**

##### **3.1.1 Compliance**

The supplier must comply with all regulatory requirements, including but not limited to applicable laws, regulations, and contracts, as well as the requirements set out in this supplier code. Compliance with the requirements set out in this supplier code is mandatory, even if these requirements establish higher standards than those required by regulatory requirements. Suppliers are strongly encouraged to comply with international and industry standards and always strive to achieve the highest standards. If there is a conflict between national law and the requirements of the supplier code, the supplier must immediately consult Moldcell.

The supplier is responsible for implementing and monitoring compliance with regulatory requirements and this supplier code in its activities and must reflect the content of the supplier code in its contracts with subcontractors.

Moldcell reserves the right to verify compliance with the supplier code through dialogue and a combination of internal and/or external assessment mechanisms, including self-assessments, surveys, on-site visits, and audits of suppliers and subcontractors. Audits may be conducted by Moldcell representatives or a professional third party engaged by Moldcell. The supplier must, therefore, maintain appropriate and complete documentation and records to demonstrate compliance with the requirements.

##### **3.1.2 Structured Management Approach**

The supplier must establish clear objectives and processes for meeting the requirements set out in this supplier code. The supplier must implement, maintain, and demonstrate its commitment to and compliance with the requirements by applying appropriate management systems, efficient risk management, and allocating appropriate and sufficient resources commensurate with the size and nature of the supplier's activities. The supplier must implement a culture of continuous improvement or take steps in this direction to develop and apply measures that ensure compliance with the requirements set out in the supplier code. The supplier must also have appropriate remediation mechanisms in case of violations of these requirements.

The supplier must ensure adequate knowledge for its employees and managers on the subjects for which it has assumed obligations under this supplier code, investing in their training and awareness. Employees must be informed and/or trained about their rights.

## **Supplier Code of Conduct for the Moldcell Group**

Public Document

Approved: CEO of Moldcell SA

Date: 01.06.2024

### **3.1.3 Reporting and Communication**

The supplier must immediately report any existing and/or suspected violations of regulatory requirements and the supplier code to a Moldcell representative or anonymously to the email address [whistleblowing@moldcell.md](mailto:whistleblowing@moldcell.md). The supplier must maintain accurate, timely, and adequate information about compliance, make it available to Moldcell upon justified request, and fully cooperate with Moldcell in all investigations related to fulfilling contractual obligations.

Upon Moldcell's request, the supplier must provide information about the traceability of its products to improve value chain transparency.

### **3.1.4 Termination**

In case of a significant violation of the supplier code requirements, Moldcell has the right to immediately terminate the contract(s) with the supplier, without affecting other existing rights and remedies.

## **3.2 SOCIAL REQUIREMENTS**

### **3.2.1 Human Rights Policy and Due Diligence**

According to the UN Guiding Principles on Business and Human Rights, the supplier has the obligation to respect human rights and, therefore, must have policies and due diligence processes to identify, prevent, mitigate, and report how it addresses adverse human rights impacts it may cause, contribute to, or be associated with. Addressing human rights impacts involves taking appropriate measures to avoid, minimize, and/or mitigate them.

The complexity of due diligence regarding human rights depends on the size of the company, the risk of serious human rights impacts, and the nature and context of its activities.

### **3.2.2 Confidentiality and Freedom of Expression**

The supplier must:

- Ensure that its products, services, and business processes respect the confidentiality and freedom of expression of individuals;
- Not cause or contribute to the violation of privacy or freedom of expression rights and not take retaliatory actions against those who exercise these rights;
- Respect the privacy rights of all individuals (employees, customers, users, and other stakeholders) when collecting personal data or applying employee monitoring.

## **Supplier Code of Conduct for the Moldcell Group**

Public Document

Approved: CEO of Moldcell SA

Date: 01.06.2024

### **3.2.3 Employment Contracts**

The supplier must:

- Ensure written individual or collective employment contracts with clear terms, including but not limited to, working hours, wages, rights, responsibilities, and employment conditions, in accordance with legal requirements;
- Ensure that employees receive a copy of the employment contract;
- Pay employees at least the minimum wages defined by local legislation and applicable collective agreements;
- Respect the working hour rules set by all International Labour Organization conventions, national legislation, and applicable collective agreements;
- Not discriminate against any employee;
- Not use any form of involuntary labor in its operations and not use workers under the age defined by ILO Convention 138 regarding child labor and national legislation;
- Not use forced labor or other forms of non-voluntary labor and ensure that all employees are free to leave their job after a reasonable notice period.

### **3.2.4 Health and Safety**

The supplier must ensure a safe and healthy working environment in accordance with international standards and applicable legal requirements and make continuous efforts to minimize risks and improve health and safety at the workplace.

The supplier must identify hazards to employees' health and safety and take appropriate preventive measures to ensure the safety of all employees and other persons who may be affected by its activities.

In addition to complying with existing occupational health and safety legislation, operators within Moldcell's responsibility (e.g., in construction or technical sites) have the following additional obligations:

- Delegating a responsible person: Appointing a person responsible for implementing and monitoring occupational health and safety policies within the organization. The responsible person will be the primary contact point for Moldcell regarding these issues.
- Written instructions: Developing and distributing to all employees clear and concise written instructions regarding workplace safety procedures, potential risks, and necessary

## **Supplier Code of Conduct for the Moldcell Group**

Public Document

Approved: CEO of Moldcell SA

Date: 01.06.2024

precautions. The instructions will be updated periodically to reflect any changes in the work environment or legislation.

- **Documenting accidents:** Detailed recording of all accidents that occur during activities, including causes, consequences, and preventive actions taken. The information will be promptly communicated to Moldcell to facilitate a comprehensive analysis and the implementation of improvement measures.
- **Risk assessment:** Periodically conducting workplace risk assessments to identify potential hazards and develop action plans to eliminate or reduce them. Assessments will be conducted by qualified personnel and will consider aspects specific to the field of activity.

### **3.2.5 Environmental Protection**

The supplier must comply with all applicable legal requirements and regulations related to environmental protection and minimize the negative impact on the environment through sustainable practices and resource management.

The supplier must consider the efficient use of electricity and recycling in product design, including packaging. The supplier must consider the recovery, reuse, and recycling of products and materials contained in them.

The supplier must collaborate with Moldcell to reduce the impact on the environment and avoid the use of any hazardous substances.

### **3.2.6 Combating Corruption and Bribery**

The supplier must adopt a zero-tolerance policy towards all forms of corruption, including but not limited to, bribery, fraud, money laundering, and nepotism. The supplier must implement appropriate measures to prevent corruption and bribery and immediately report any suspicion of corruption to Moldcell.

The supplier must comply with all applicable laws and regulations regarding corruption and bribery in all jurisdictions in which it operates.

Offering and accepting gifts as part of business negotiations can create conflicts of interest. As a Moldcell supplier, you are requested to follow the recommendations below:

- Moldcell employees may accept gifts of limited value from suppliers. Any inappropriate or unethical rewards, including cash, valuable gifts, sponsorships, personal discounts, etc., are prohibited.
- Suppliers should not pay for the entertainment provided to Moldcell employees' families.

## **Supplier Code of Conduct for the Moldcell Group**

Public Document

Approved: CEO of Moldcell SA

Date: 01.06.2024

- When Moldcell employees visit suppliers or participate in exhibitions or conferences, their travel and accommodation expenses should be covered by Moldcell.
- Moldcell employees cannot participate in the promotion or advertising campaigns of our suppliers' products and services.
- Goods offered by suppliers and events hosted by suppliers should be tasteful and not offend any participant based on gender, race, nationality, disabilities, or other characteristics.