

OUR PRINCIPLES, OUR PURPOSE.

SUPPLIER CODE OF CONDUCT

A commitment to our global team, our values and integrity.

THOR expect extraordinary

Supplier Code of Conduct

OUR VALUES

Solve with ingenuity. Deliver with integrity.

A message from Giuseppe De Lucia

Chief Operating Officer, EMEA,
and Main Board Director.

“I’m proud to say that I’m part of the THOR family and I understand and uphold our Codes.”

For over 65 years, THOR has been manufacturing innovative speciality chemicals for customers around the world. Often unseen by their users, our products can be found in a variety of industries. All expertly developed by trusted chemical specialists, enabling the extraordinary for people and planet.

At THOR Group, we are committed to the highest standards of corporate social responsibility, ethical principles, and sustainability in everything we do.

Our objective is to contribute to the advancement of a sustainable society. In pursuit of this objective, we place great emphasis on forging resilient partnerships and fostering long-lasting collaboration with our suppliers and contractors.

We expect everyone we work with to share our commitment to consistent standards of corporate responsibility, helping to ensure compliance across our supply chain.

Our Supplier Code of Conduct is our expectation of how those in our supply chain join us in our pursuit of a global, sustainable society. It is our expectation of the requirements to partner with us to supply goods or services to THOR anywhere in the world.



Environment and Safety

ENVIRONMENT AND SAFETY

Suppliers are expected to conduct their operations in a manner that protects the environment while safeguarding the health, safety, and wellbeing of employees, contractors, customers, and the wider community.

This includes complying with all relevant environmental and health and safety legislation, managing operational risks responsibly, and adopting practices that minimise environmental impact while supporting safe, sustainable and resilient operations.

All of our suppliers are expected to:

- Comply with all applicable laws and regulations relating to the environment and health and safety, ensuring that all necessary operating permits and permissions are in place and maintained.
- Ensure processes are in place to maintain the correct management of waste, emissions and discharges.
- Utilise resources efficiently, adopting energy-efficient and environmentally friendly technologies and reducing waste and emissions to air, water and soil through continuous monitoring and responsible management.
- Implement management systems to ensure that products meet applicable quality and safety requirements.
- Safeguard the health and safety of employees, neighbours and the public by addressing hazards associated with processes and products.
- Ensure the correct storage, use and transportation of all hazardous chemicals related to the organisation.
- Implement procedures that address and handle potential emergency scenarios, aiming to minimise their repercussions on individuals, assets, communities, customers and the environment.

SOCIAL

Suppliers are expected to uphold internationally recognised human rights and foster fair, safe and inclusive working environments throughout their operations and supply chains.

This includes treating all workers with dignity and respect, promoting equality and preventing exploitation, discrimination and modern slavery in all its forms.

All of our suppliers are expected to:

- Respect recognised human rights across operations and supply chains. Suppliers must not use, support or benefit from forced, bonded, indentured, involuntary prison or child labour, and must maintain zero tolerance for modern slavery and human trafficking, whether occurring directly in their operations or indirectly through subcontractors, agents, labour providers or third parties. Suppliers must not source goods or materials produced using such labour.
- Conform to all relevant regulations concerning wages and working hours, ensuring no discrimination in employee compensation.
- Treat all employees with dignity and respect, including zero-tolerance of any form of abuse or harassment, whether it is verbal or physical in nature.
- Promote diversity and inclusion within their organisation ensuring there is zero-tolerance of discrimination including (but not limited to) discrimination related to age, disability, gender reassignment and gender identity, national origin, sex or sexual orientation, marital or civil partnership status, family status including pregnancy and maternity.
- Paternity or other carer status, race including ethnic origin, genetic information, religious, political or other beliefs.
- Full-time or part-time status or any other trait safeguarded by relevant legislation.
- Ensure employee freedom to associate and the right to bargain collectively, to the extent permitted under applicable local law.
- Prevent illegal eviction and unauthorised acquisition of land, forests and water bodies.

GOVERNANCE

Suppliers are expected to conduct business ethically, transparently and in full compliance with all applicable laws and regulations.

This includes maintaining robust governance, protecting confidential information, managing risks responsibly, and ensuring high standards of integrity throughout their operations and supply chains.

All of our suppliers are expected to:

- Comply with all applicable national and international laws and standards.
- Maintain zero-tolerance relating to any form of bribery, corruption, or money laundering. Ensure that any payments, presents, or other engagements extended to clients, government officials, subcontractors, or other parties acting on your behalf adhere to the stipulations set forth in relevant anti-bribery regulations. We uphold the principle that THOR employees neither offer nor accept gifts or favours that might compromise or cast suspicion upon the impartiality of their decisions.
- Maintain compliance with all national and international regulations relating to applicable competition laws, regardless of jurisdiction, ensuring that there is no engagement in price fixing, bid rigging, market collusion or other anti-competitive practices.
- Ensure adherence to relevant non-proliferation, export control, sanctions, and embargo regulations.
- Ensure that there are no conflicts of interest in business relationships with THOR.
- Protect THOR's confidential and commercially sensitive information, personal data and intellectual property. Suppliers must apply appropriate data protection and information security safeguards, including basic cybersecurity controls, to prevent unauthorised access, loss, misuse or disclosure.
- Implement suitable policies, management systems, and allocate resources to ensure the responsible management of all their operations, in accordance.
- With relevant legal obligations and the standards detailed in this Supplier Code of Conduct.
- Suppliers are expected to use reasonable efforts to uphold equivalent standards within their own supply chains, including with relevant subcontractors, agents and other third parties.
- Implement suitable health, safety, and environmental (HSE) risk management procedures that identify hazards at site/ locations and effectively manage all related health, safety, and environmental risks to an acceptable level.
- Institute training initiatives to enable their managers and employees to attain a suitable level of knowledge and comprehension regarding the provisions outlined in this Supplier Code of Conduct, in addition to applicable laws, regulations and acknowledged standards.





WHISTLE BLOWING

All suppliers are expected to facilitate a mechanism for their employees and other stakeholders to raise concerns or report potential unlawful activities within their workplace.

THOR's whistleblowing system, SpeakUP, allows for confidential reporting of issues related to illegal or improper conduct.

Concerns may be raised in good faith without fear of retaliation. Retaliation is not tolerated.

If you see or suspect any conduct or business practices that are contrary to our Supplier Code of Conduct, you should report your concern using the following web form: **bit.ly/THOR-SpeakUP**

Where concerns or breaches are identified, THOR may review these with the supplier and expect appropriate corrective action.

Whistle Blowing

Worldwide Network

THOR'S WORLDWIDE NETWORK

As our business has grown, so has our global footprint. We're located in over 15 countries around the world, so you're never far from a THOR expert.

Our Worldwide Network

Our evolution as a global business has led to the strategic placing of a THOR site in almost every major marketplace in the world.

This enables us to address preservation issues unique to local markets, or offer bespoke solutions in highly regulated countries. Solved with ingenuity, and delivered with integrity.

Here's how to find us around the world...

- Group HQ & United Kingdom
- Australia
- Brazil
- China
- France
- Germany
- India
- Italy
- Japan
- Malaysia
- Mexico
- New Zealand
- Singapore
- Spain
- South Africa
- South Korea
- Sweden
- Türkiye
- USA

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