

Supplier Code of Conduct

Votorantim Cimentos North America



Our Culture

Our VC Way is part of our DNA and composes our essence. They are the principles that manage and guide our day-to-day behaviors and help us build an even more promising future.

OUR VC WAY

OUR WAY OF BEING	OUR WAY OF DOING	OUR WAY OF GOING BEYOND
Ethical and human	Together with excellence	with courage to transform
#ethics_and_diversity #safety_and_health #frank_dialogue	#customer_focus #simplicity_and_trust #take_responsibility	#lean_and_evolve #long-lasting_results #positive_legacy

While St. Marys Cement Inc. (Canada) and its affiliates ("VCNA") understands that its suppliers operate in different legal and cultural environments, this Supplier Code of Conduct outlines the expectations of VCNA regarding the ethical, legal, and environmental standards we expect all our suppliers to adhere to. This Supplier Code of Conduct reflects VCNA's commitment to integrity, fairness, and responsibility, and we expect the same from our suppliers to ensure a strong and integral culture, aligned with our VC Way that drives our operations in favor of a healthy business environment and fair society.

Compliance with laws

All suppliers must comply with all applicable local, national, and international laws, regulations, and standards, including those related to labor, health and safety, and the environment. Where applicable local laws impose less restrictive obligations on a supplier, the supplier is expected to adhere to the standards of this Supplier Code. Where applicable local laws impose greater obligations on a Supplier, the Supplier must comply with such laws and regulations.

Labour Practices

VCNA is committed to upholding the highest standards of human rights and expects our suppliers to do the same. This includes strictly prohibiting and putting in place measures to mitigate the risks of forced labor, child labor, bonded, compulsory labour or any form of modern slavery and any form of harassment or discrimination. Suppliers are prohibited from engaging in or benefitting from any form of human trafficking. Suppliers must not employ individuals below the minimum age permitted by local law and the core International Labour Organization standards.

Suppliers must ensure fair working conditions, reasonable working hours, and compensation that meets or exceeds the legal minimum. Suppliers must abide by all local laws and mandatory industry standards and must respect any applicable collective bargaining agreements regarding work hours, overtime, rest period requirements, and paid vacation. Suppliers must provide work with pay and benefits in a timely manner and comply with minimum wage and overtime pay requirements. Suppliers should provide all workers with clear and understandable employment documentation, outlining worker terms and conditions and their rights and responsibilities.

Conflict of Interests

Suppliers must avoid any situation that may create a conflict of interest or the appearance of a conflict of interest. This includes situations where personal, financial, or other interests could influence or appear to influence the Supplier's ability to act in the best interests of VCNA. Suppliers are required to disclose any potential conflicts of interest to VCNA promptly.

Gifts and Entertainment

Suppliers must not offer or accept gifts, entertainment, or other benefits that could be perceived as a way to influence business decisions or gain an unfair advantage. Any gifts or entertainment provided must be reasonable, infrequent, and in accordance with local laws and regulations. Suppliers should avoid any actions that could create a sense of obligation or compromise the integrity of the business relationship.

Freedom of Association and Collective Bargaining

VCNA embraces and promotes employees' freedom of association and collective bargaining and expects its suppliers to support employees' ability to make their own choices about representation. Suppliers must comply with local law regarding the activities of trade unions and work councils and their organizational activities.

Diversity and Inclusion

VCNA is committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion. We embrace differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make individuals unique. Suppliers are expected to demonstrate a commitment to diversity and inclusion within their own business practices.

Health and Safety

Suppliers must provide a safe and healthy work environment for their employees, in accordance with all applicable laws and regulations. This includes proper training, equipment, and protocols to prevent accidents and injuries.

Environmental Responsibility

Suppliers are expected to operate in an environmentally responsible manner, minimizing waste, emissions, and the use of hazardous materials. They should also comply with all environmental laws and regulations.

Ethical Business Conduct

Suppliers must conduct their business in an ethical manner, with integrity and transparency. This includes avoiding conflicts of interest, corruption, bribery, and respecting intellectual property rights.

Monitoring and Compliance

VCNA reserves the right to verify compliance with this code through audits and inspections. Suppliers found to be in violation may be subject to corrective action or termination of the business relationship.

Reporting Concerns

Suppliers are encouraged to report any concerns or violations of this code confidentially and without fear of retaliation. VCNA reject any form of punishment, disciplinary or retaliatory action made against anyone who exposes or helps deal with a matter relating to business conduct. If this occurs, we expect anyone who witness any actions contrary to this code or any form of retaliation to report it through the Ethics Line www.votorantimcimentos.com/ethicsline .

Conclusion

By adhering to this Supplier Code of Conduct, together we can ensure that our business practices reflect our commitment to ethical conduct, respect for human rights, and environmental stewardship.

Questions? Contact Us.

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