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# **Supplier Code of Conduct**

## **Contraf-Nicotex-Tobacco GmbH**

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## **Introduction**

CNT has adopted both Legality and Corporate Responsibility as an integral part of its Corporate Governance Principles, addressing sustainable related challenges to conduct business in a responsible and sustainable manner across our operations and supply chain. To this end, we expect our Suppliers to be aligned with our values and commitments and to promote responsible and ethical business practices throughout the supply chain.

This Suppliers' Code of Conduct set minimum guidelines and principles that outline the expected behavior and ethical standards of all our Suppliers. We require Suppliers to implement appropriate risk and control systems to monitor compliance and engage with their own workers and Suppliers to adhere these principles. When appropriate, Suppliers are expected to provide reasonable information, transparency, cooperation, and evidence to assess their compliance. Upholding these standards not only aligns with legal requirements but also reflects our collective commitment to fostering positive societal impact and ethical business practices.

In the event of potential non-compliance is identified, the Supplier should address the issue responsibly. This could involve the development of an action plan or making the necessary changes to rectify the issue. CNT may monitor the Supplier's progress in rectifying the non-compliance issue. If the Supplier fail to remediate the non-compliance or demonstrate lack of commitment to addressing it, CNT may decide agreement termination or suspension of business relations.

## **Scope**

All Suppliers must respect and comply with the principles outlined in this document to establish or continue doing business with CNT and its Affiliates. By Suppliers' we mean any third party that supplies or provides product materials, goods, or services to any CNT Group companies, including consultants, independent contractors, agents, manufacturers, primary producers, sub-contractors, distributors, and wholesalers.

## **Principles**

### **Ethical standards**

Legal compliance and business integrity are fundamental pillars for our company's and supply chain's success and resilience. All Suppliers of CNT and its Affiliates are expected to uphold and act in accordance with the ethical principles and values of respect, integrity, and compliance with laws and regulations.

### **Compliance with Laws and Regulations**

CNT expects compliance with applicable laws, regulations, and industry standards of the jurisdictions where business activities are conducted, while also considering broader international standards and obligations. Where national law and international standards differ, or where they conflict with each other, Suppliers are expected to seek ways to respect all international regulations to the greatest extent possible.

## **Conflicts of Interest**

Conflicts of interest can undermine fair decision-making and compromise the integrity of our business relationships. We require our Suppliers to avoid situations that could create conflicts of interests that compromise business activities with CNT and its Affiliates. A conflict of interest arises when a Supplier's personal, financial, or other interests affect, or appear to affect, objectivity or impartiality in decision-making while conducting business with CNT and its Affiliates.

All Suppliers are expected to promptly disclose any actual or potential conflicts of interest that may arise during their engagement with CNT and its Affiliates (such as personal relationships, financial interests, or other situations that may, or may appear to be in conflict with the interests of CNT). In the event of a conflict of interest or suspected conflict, we are committed to work collaboratively to address and resolve actual or potential issue.

## **Anti-corruption and Anti-bribery**

CNT is committed to and believes in free markets and does not tolerate any act of bribery or corruption. Corruption includes bribery, embezzlement, fraud and other forms of illicit behavior aimed at gaining an unfair advantage or manipulating the system.

We expect all Suppliers to comply with the relevant national's and international's anti-bribery and corruption standards and laws, in particular the U.S. Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act.

Supplier must not, in violation of any law, offer, pay, or agree to pay, directly or indirectly or by the use of a third party or on behalf of CNT or CNT's Affiliates, any consideration of any kind to any Government Official to influence the act, decision or omission of any Government Official in its official capacity in connection with any agreement between Supplier and CNT. Suppliers are expected to immediately report in writing to CNT any attempt by any person or entity to solicit such a payment or any such agreement to pay. Likewise, Suppliers must promptly report in writing to CNT any suspected or actual violation of any anti-bribery/anti-corruption laws in connection with any agreement between Supplier and CNT or, without regard to any connection to any agreement with CNT, by the Supplier or any of Supplier's Personnel.

## **Export Control and Economic Sanctions**

It is CNT's policy to comply with all EU and UN sanctions, applicable US sanctions, and any other national and international economic sanctions and other regulations.

Suppliers are not allowed to sell, (re-) export, or otherwise transfer any product received from CNT to any embargoed country or region or in violation of any applicable EU or US export or sanctions law, regulation, executive order, or directive.

Suppliers are expected to ensure at all times that them and their Suppliers are not listed on, or owned or controlled, collectively or individually, directly or indirectly, by one or more persons listed on, a sanctions list issued by the European Union, the United States, the UN or any another applicable sanctions authority, including but not limited to the Specially Designated Nationals and Blocked Persons List. Likewise,

Suppliers should not be under the control of, or acting for or on behalf of, anyone in any Embargoed Destination.

Suppliers are expected to implement reasonable screening procedures to comply with economic sanction programs and are requested to promptly inform CNT in the event of any changes in the legal circumstances described above.

### **Anti-Boycott**

CNT does not accept or support participation in any boycott that is not sanctioned by the applicable government. All Suppliers are expected to comply with the applicable legislation and should not participate in any unauthorized boycotts.

### **Money Laundering and tax invasion**

Money laundering is a serious financial crime that involves the crime of moving money that has been obtained illegally to make it seem as if the money has been obtained legally. CNT expects commitment of its Supplier to comply with the appropriate anti-money laundering laws and ensure non-involvement in any kind of tax invasion or financing of any illegal activities.

### **Commercial counterfeit and other illicit products**

CNT is dedicated to an effective anti-counterfeiting policy. Suppliers must consider how this policy may apply to all business transactions specific to the purchase of tobacco, nicotine, and other ingredients. CNT does not tolerate any knowingly engagement in the manufacture, distribution or sale of counterfeit or otherwise illicit products.

### **Data privacy and data protection**

Suppliers should comply with applicable data protection laws and regulations, to implement responsible data management practices and to prevent unauthorized access, loss, or alteration of confidential information. Suppliers must handle all data provided by CNT and its Affiliates, its customers, or stakeholders with the utmost responsibility and care. This includes personal data, proprietary information, and any other sensitive or confidential data entrusted to them in the framework of doing business. Suppliers shall not use CNT's and its Affiliates' confidential information for any purpose other than as expressly authorized by CNT and its Affiliates'.

### **Fair Competition**

CNT commits to promote fair competition and prohibits anti-competitive practices or unfair trade practices. We seek to outperform our competition fairly and honestly, through superior performance and never through unethical or illegal business practices. Suppliers are expected to conduct their business in a manner that upholds the principles of fair and free market and to always act in line with antitrust and competition laws.

## Human and labour rights

CNT commits to respect internationally recognised human rights reflected in the International Bill of Human Rights<sup>1</sup> and the ILO core labour standards<sup>2</sup>. This commitment extends not only to our internal operations but also to our global supply chain.

We identified and prioritised a range of human rights issues and have summarised our expectations and commitments below. Nevertheless, our respect and expectations for human rights is not limited to these issues.

## Child labour

Child labour, and particularly worst forms of child labour, are unacceptable and totally prohibited. The minimum age for work, except for light work, should not be less than the age of completion of compulsory schooling and, in any case, should not be less than 15 (fifteen) years. Individuals under the age of 18 (eighteen) should not, under any circumstance, perform hazardous work.

Please refer to CNT's **Child Labour Policy** for more details on CNT's commitments to child labour.

## Modern slavery

All forms of forced labour, human trafficking, bonded labour, slavery, and servitude are totally prohibited. Any situation that a person cannot refuse or cannot leave because of threats, violence, deception, abuse of power or other forms of coercion is unacceptable.

## Discrimination and harassment

CNT strongly supports equal opportunities and does not tolerate discrimination or harassment throughout its operations and supply chain. This includes discrimination or harassment based on race, colour, national and ethnic origin, social origin, health status, disability, sexual orientation, gender expression, age, gender, political opinion, religion, pregnancy or any other protected category under applicable law.

## Working conditions

CNT promotes and provides decent work for all people who work on our premises and expects the same from its Suppliers. Living wage is an essential aspect of decent work to ensure that all workers and families can live in dignity. All workers should be provided with a compensation that meets at least the legal minimum standards; or appropriate prevailing industry standards, whichever is higher. Suppliers must comply with local laws regarding working hours and conditions, ensuring that employees are not forced to work beyond legal limits and that adequate rest periods are provided. Overtime should be voluntary and compensated fairly.

Suppliers should provide a safe and healthy workplace environment in accordance with relevant laws and industry standards. This includes proper safety equipment, training, and procedures to prevent accidents and injuries.

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<sup>1</sup> [OHCHR | International Bill of Human Rights](#)

<sup>2</sup> As reflected in the ILO Declaration on Fundamental Principles and Rights at Work (amended in 2022), [ILO Declaration on Fundamental Principles and Rights at Work \(DECLARATION\)](#)

CNT does not accept restrictions with regard to the rights of workers to freedom of association and collective bargaining.

Please refer to CNT's **Human Rights Policy** for more details on CNT's commitments and expectations to Human Rights.

### **Environmental responsibility**

At CNT, we are committed to minimizing our environmental footprint and promoting responsible practices across our operations and supply chain. We commit and adhere to the applicable environmental legislation and regulations in the countries where we operate.

We ask all Suppliers to operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Suppliers are expected to focus on environmental challenges, including, but not limited to climate change, biodiversity, soil health and water stewardship.

Please refer to CNT's **Environmental Policy** for more details on CNT's environmental commitments and expectations.

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### **Raising Concerns and Grievances**

We encourage internal and external stakeholders to communicate in good faith unlawful and unethical behaviors, and violations of the CNT Code of Conducts and Policies. To report a grievance or seek guidance on ethical or compliance concerns we offer the following ways:

- Addressing the issue or concern directly with the corresponding Line Manager or with the Legal or Human Resources Function.
- Use of CNT Integrity Line: If direct communication as described above is inappropriate under the circumstances, we offer CNT online grievance mechanism where confidentiality and anonymity are protected. The Whistleblower can upload a report using the company's official online portal ([cntleaf.integrityline.com](https://cntleaf.integrityline.com)) or contacting EQS Group at the phone number +498001898550, where an external person will upload the report.

**CNT Integrity Line**  
[cntleaf.integrityline.com](https://cntleaf.integrityline.com)

Please refer to CNT's **Grievance Mechanism Procedure** for more details.

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