

OCTATUBE SUPPLIER CODE OF CONDUCT

Octatube is a 'Design & Build' partner. We focus on offering high quality solutions for facades and roofs with innovative and qualitative techniques and materials. Our work shows that a diverse and creative team can successfully realize unique concepts and thus contribute to a sustainable and inspiring environment for everyone.

In alignment with our mission and as part of our ongoing sustainability efforts we have developed the Octatube Supplier Code of Conduct to ensure that all of our business partners, suppliers, and manufacturers meet our basic expectations of doing business related to legal requirements, ethical practices, human rights, and environmental management. These standards are based on well-respected and recognized international standards, including the International Labor Standards and the United Nations Universal Declaration of Human Rights.

Compliance with these standards is an expectation of doing business with Octatube, as this Code defines the non-negotiable minimum standards that we ask our suppliers and their sub-tier suppliers or sub-contractors (The Supplier), to respect and adhere to.

Octatube strives to develop and strengthen partnerships based on a shared commitment of transparency, collaboration, and mutual respect. We recognize that our suppliers are independent businesses and the exclusive employers of their workers. However, the actions of our business partners can be attributed to Octatube, affecting not only our reputation, but the level of trust we have worked hard to earn from partners, and customers. While Octatube appreciates that our suppliers operate in a variety of different legal, geographical and cultural environments we expect all suppliers to comply with this Code, and hope that our suppliers will strive to exceed these standards.

The standard of this Code are in addition to, and not in lieu of, the provisions of any legal agreement or contract between the Supplier and Octatube. The following eight categories encompass the Suppliers Code of Conduct.

1. COMPLIANCE WITH LAWS

- A. In all her activities, the Supplier must ensure they conduct business in compliance with the applicable laws, rules, and regulations of the jurisdictions in which she operates, including those related to social and environmental performance.
- B. The Supplier maintains accurate financial books and business records in accordance with all applicable laws, rules, and regulations and accept accounting practices.

2. ANTI-BRIBERY AND ANTI-CORRUPTION

- A. Octatube is committed to conducting business legally and ethically within the framework of free enterprise system. Corrupt arrangements (obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means) with customers, suppliers, government officials, or other third parties are strictly prohibited. The Supplier must not engage in any conduct that would put our organization at risk of violating anti-bribery laws.
- B. The Supplier will disclose to Octatube any situation that may appear to be a conflict of interest, and disclose if a worker from one of their family members, or a friend may have an interest of any kind in Supplier's business or any kind of economic ties with the Supplier.
- C. Octatube expects the Supplier to provide workers with fair and equal compensation for hours worked, and that all work is conducted on a voluntary basis.
- D. The Supplier must ensure that its workers work in compliance with all applicable laws and mandatory industry standards, pertaining to regular working hours and overtime hours, including breaks, rest periods, holidays, and maternity and paternity leaves.

3. ENVIRONMENT

- A. Octatube expects the Supplier to cooperate with Octatube to promote environmental sustainability.
- B. The Supplier is to assist in reducing our environmental footprint, conduct business in an environmentally responsible way, and offer environmentally responsible products and services.

4. RESPECT AND DIVERSITY

- A. The Supplier must maintain workplaces characterized by professionalism, and respect for the dignity of every individual with whom their employees interact.
- B. The Supplier must respect the diversity of their employees, clients and others with whom they interact, including respect for differences such as gender, race, color, age, disability, sexual orientation, ethnic origin and religion.
- C. The Supplier must not tolerate harassment, discrimination, violence, retaliation, and or other disrespectful and inappropriate behavior.
- D. The Supplier must respect the dignity of their own employees and others, adhere to principles of diversity and maintain a respectful workplace.
- E. The Supplier must respect local communities and take into account the impact of her products, services and business practice on local communities.

5. HEALTH AND SAFETY

- A. Octatube expects the Supplier to provide a healthy and safe workplace and comply with relevant health and safety laws.
- B. Octatube expects the Supplier to provide all their employees with adequate information and instruction on health and safety concerns and to enable their employees to meet their responsibilities for the maintenance of a healthy and safe workplace.

6. EMPLOYMENT PRACTICES

- A. The Supplier must abide by applicable employment standards, labor and human rights legislation.
- B. The Supplier shall respect employees' rights to join or refrain from joining associations and worker organizations.
- C. Where laws do not prohibit discrimination, or where they allow for differential treatment, Octatube expects the Supplier to be committed to non-discrimination principles and not to operate in a way that differentiates unfairly.
- D. The Supplier must be able to demonstrate that, in their workplaces:
 - i. Child labor is not used
 - ii. Discrimination and harassment are prohibited, including discrimination or harassment based on any characteristic protected by law.
 - iii. Employees are free to raise concerns and speak up without fear of reprisal.
 - iv. Clear and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements.

7. COMMUNICATION AND REPORTING

- A. The Supplier shall take appropriate steps to ensure the principles of this Code are communicated to their workers. The Supplier shall also take appropriate steps to ensure the principles of this Code are adopted and applied by their workers, suppliers, agents, and contractors.
 - i. Books and records
 - ii. Audits and assessments
 - iii. Reporting
- B. Record keeping
 - i. The Supplier must not destroy our records that may be relevant to any pending or threatened legal or regulatory proceeding of which the Supplier becomes aware.
 - ii. The Supplier must maintain adequate internal records to ensure proper compliance with their obligations to Octatube.
- C. Code compliance and monitoring
 - i. Octatube is very committed to compliance with this Supplier Code Of Conduct. Octatube expects the Supplier to comply with this Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by Octatube.
 - ii. In addition, Octatube must be able to monitor and audit the Supplier control environment, for example by visiting the Supplier or receiving information from the Supplier.
 - iii. Failure to comply with this Code may result in termination of the Supplier's relationship with Octatube.

8. REPORT SUSPECTED VIOLATIONS OF THIS CODE

- A. The Supplier and/or the Supplier's employees or contractors may report suspected violations of this Code to Octatube.

ACCEPTANCE

By signing the Octatube Supplier Code of Conduct the Supplier acknowledges having read, understood and accepted the required principles of decent business conduct as described in the Octatube Supplier Code of Conduct. Octatube expects the Supplier to fulfill the aforementioned elements by incorporating them in her own business practice.

Signed by

Name Supplier

Signature

Date