

# Just Russel

## Supplier Code of Conduct

### **1. The purpose of Just Russel's Supplier Code of Conduct**

This Supplier Code of Conduct ('Code') is written for Just Russel and each and every subsidiary company of Just Russel (hereinafter 'Just Russel'). Just Russel is committed to building sustainable relationships with stakeholders, partners and suppliers based on trust, integrity and transparency. Suppliers play a key role in reflecting Just Russel's values and business standards. This Supplier Code of Conduct sets out the principles and requirements for responsible business conduct in line with Just Russel's commitment to socially fair and sustainable business practices. The goal is that suppliers sign and comply to this Code.

### **2. Scope of application**

The scope includes all suppliers of goods and services (hereafter referred to as 'Supplier(s)'). This Code takes effect on July 1st, 2025, and replaces all previous Codes. If local laws or standards differ, the stricter rules apply. Just Russel may amend this Code at any time. The current version is available at <http://www.justrussel.com/suppliercodeofconduct>. It will be reviewed and updated at least every 24 months. Supplier must ensure their subcontractors comply with this Code or an equivalent standards. Supplier is also expected to apply a similar Code to their own suppliers or ensure comparable social, ethical, and environmental standards are met and to perform the appropriate due diligence on environmental and human rights risks in its supply chain.

### **3. The Supplier Code of Conduct**

Just Russel is dedicated to upholding and safeguarding the fundamental human rights of all individuals impacted by our operations, in line with the UN Universal Declaration of Human Rights and the International Labor Organization conventions, and the OECD guidelines for Multinational Enterprises on Responsible Business Conduct. We expect our suppliers to share this commitment. Our business practices are grounded in respect for human dignity and equality, and we expect our suppliers to adhere to the same high standards. We hold our suppliers to the highest ethical standards, requiring them to conduct business with integrity, free from corruption, fraud, and the misuse of power. Suppliers must avoid conflicts of interest and demonstrate respect for intellectual property and customer data protection. Just Russel also expects its suppliers to maintain fair working conditions and ensure environmental responsibility. Transparency in traceability and adherence to all applicable laws and ethical practices are key to the success of our partnerships. Therefore:

#### **a. Human rights**

- Supplier will not employ anyone under 15 or the legal minimum age, whichever is higher.
- Supplier will not use forced, bonded, illegal, or involuntary prison labor.
- Supplier will not engage in human trafficking or slavery.
- Supplier will allow employees to leave freely with reasonable notice.

#### **b. Anti-discrimination**

- Supplier shall not discriminate based on personal characteristics or beliefs and shall base employment solely on an individual's ability to perform the job.

#### **c. Working conditions**

- Supplier shall pay a living wage as defined by the International Labor Organisation, fairly, regularly, on time.
- Supplier shall never pay less than the legal minimum.
- Supplier shall, where no such law exists, pay wages that cover basic needs.
- Supplier must employ only workers with a legal right to work in the country. All workers, including temporary/seasonal workers, must be treated fairly, ethically, and with dignity and respect, free from any form of harassment or abuse.
- Supplier must follow legal and international standards on working hours, including overtime, breaks, and rest, with respect the principles of the International Labor Organization with regards to working conditions. Employees are entitled to at least one day off in every seven-day period. Where such regulations do not exist, working hours shall not exceed 60 hours per week including overtime.
- Supplier must respect employees' rights to freely associate and bargain collectively without penalty or interference. Employees have the rights to join a trade union where allowable by law.
- Supplier will provide a safe, healthy, and secure workplace and environment, appoint a competent person for health and safety management, and ensure workers are aware of risks.
- Supplier must apply the same standard to any housing provided.
- Supplier must enable employee to report unsafe practices without fear of reprisal.

#### **d. Ethical business - Anti-bribery & corruption**

- Supplier must act ethically and transparently in marketing and sales, competing fairly.
- Supplier must comply with anti-trust and competition laws.
- Corruption, extortion, bribery are strictly prohibited.
- Supplier shall not take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information<sup>1</sup>, misrepresentation of material facts, fraudulent and corrupt behavior or any other unfair dealing practice.
- Supplier must have measures to prevent such misconduct.

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<sup>1</sup> Confidential Information means information and/or data and/or material of a confidential nature or purpose, including but not limited to proprietary, commercial, developmental, technical, sensitive information and/or data and/or material, whether protected by intellectual property rights or not, including – but not limited to – processes, procedures, prices, trade secrets, know-how, designs, models, tools, recipes, methods, inventions, creations, discoveries, tests, technologies, machinery, manuals and/or any other documentation and/or works disclosed by Just Russel to Supplier.

- Gifts or incentives that could influence decisions are not allowed; cash or gift cards are always prohibited. Business dinners and similar outings are acceptable only if they don't compromise judgment and occur in the normal course of business.

**e. Data protection – Intellectual Property – Conflict of Interest**

- Supplier protects personal information in compliance with the European General Data Protection Regulation (EU) 2016/679 of 27 April 2016 ('GDPR') and all applicable (local) privacy laws.
- Supplier shall protect all confidential information provided by Just Russel and its respective business partners.
- Supplier shall at all times respect all intellectual property rights of others, including those of Just Russel and manage technology and know-how in a manner that protects such intellectual property rights.
- Supplier should avoid any business activity that conflicts or interferes with their delivery of products and services to Just Russel.

**f. Environment**

- Supplier must comply with all current and upcoming environmental laws, including those on emissions, resource use, biodiversity, deforestation, and natural resource depletion.
- As of December 30th, 2025, supplier shall deliver only raw materials listed in Annex I of Regulation (EU) 2023/1115 (EUDR), including cattle, cocoa, coffee, oil palm, rubber, soya, and wood, as well as the relevant derived products identified by their CN codes, if these materials are fully compliant with the Regulation, and a corresponding due diligence statement (DDS) is completed and duly registered in TRACES prior to delivery.
- Supplier must hold all relevant permits and licenses for its operations.
- Supplier must act sustainably, and continuously improve the environmental impact of their operations and products.
- Supplier shall implement systems to monitor and manage emissions, waste, and water responsibly, report progress, and provide Just Russel with fact-based environmental data for their products or services upon request.

**g. Traceability**

- Just Russel reserves the right to ask the supplier to create, at any point of time with appropriate notice, full supply chain mapping back to origin to facilitate assessment of upstream supply chain compliance.
- Supplier shall be capable to disclose all the potential sources of primary origins (country of origin) associated with goods and services.

**h. Compliance to regulations**

- Supplier must comply with all applicable laws, regulations, and ethical standards where they operate, sell, or employ.
- Supplier is responsible for legal compliance related to their products or services for Just Russel and must ensure these are safe to use.
- Supplier must comply with all national and international trade and export control regulations, as well as embargoes and sanctions imposed by national or

supranational bodies or governments regarding business transactions with countries, companies and persons, and the transfer of goods and services, software or technology between countries.

#### **4. Compliance and enforcement**

- Supplier will notify Just Russel on their acceptance of this Code by sending back a signed copy by e-mail: [procurement@justrussel.com](mailto:procurement@justrussel.com)
- Supplier is obliged for prompt reporting of actual or suspected violations of law, this Code, and any contractual relationship with Just Russel. This includes violations by any worker or agent acting on behalf of either the supplier or Just Russel. Report a violation by e-mail: [procurement@justrussel.com](mailto:procurement@justrussel.com).
- To comply with this Code, Supplier is responsible for taking all necessary corrective actions in a timely manner. Failure to do so or repeated serious violations of this Code of Conduct and/or local law may lead to reduced business, suspension of business and ultimately to the termination of all activities as one of the Suppliers of Just Russel.
- To verify your compliance, we reserve the right to audit and inspect your operations and facilities upon reasonable notice, with or without support of a third party.

#### **5. Governance – roles – responsibilities**

- Any act of violation of the Supplier Code of Conduct will be investigated and addressed by the Management of the Just Russel subsidiary involved. The Management is responsible for implementing, monitoring, and enforcing this Code at their location, ensuring all operations align with its principles and that both employees and suppliers comply. Serious breaches must be reported to the Board of Directors.

#### **6. Declaration of compliance**

We, the undersigned hereby confirm that:

- We have received and taken due note of the contents of the Just Russel's Supplier Code of Conduct; We will take appropriate steps to ensure the principles of this Code are communicated to our workers, suppliers, agents, and contractors.
- We are aware of all relevant laws and regulations of the countries in which our company operates; We will respect and adhere, as a minimum, all applicable (local) laws, regulations and international standards.
- We will report to any case of violations of the Code. We will maintain accurate and transparent books, records and accounts to demonstrate compliance with applicable laws and regulations, and this Code.
- We will take appropriate steps to ensure the principles of this Code are adopted and applied by our workers, suppliers, agents, and contractors. So, we will comply with the Just Russel Supplier Code of Conduct requirements, improvement driven, without amendment or abrogation.

COMPANY NAME:

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DUNS NUMBER COMPANY (9 DIGITS):

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INDIVIDUAL NAME AND TITLE:

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SIGNATURE:

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DATE & PLACE:

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