



SUPPLIER CODE OF CONDUCT

INTRODUCTION

At Theuma, we are committed to upholding the highest standards of integrity, quality, and sustainability in everything we do. As a leading industrial door manufacturer with operations across Europe, we aim to build strong, fair, and transparent partnerships with our suppliers and business partners. This Supplier Code of Conduct (SCoC) sets out the minimum standards and principles that all our suppliers are expected to follow.

The SCoC is based on internationally recognized guidelines such as the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the ILO Fundamental Conventions, and the Universal Declaration of Human Rights.

By following these principles, we can jointly create value that is ethical, sustainable, and socially responsible.



HUMAN RIGHTS & LABOR

Theuma expects all suppliers to respect and protect fundamental human rights across their operations and supply chains. This includes ensuring that all workers are treated with dignity, fairness, and respect.

Suppliers must strictly prohibit forced labor in all forms, including bonded labor, human trafficking, or involuntary prison work. Employment must always be voluntary and supported by a written contract provided in a language understood by the worker. No worker should be required to surrender identification documents or pay recruitment fees to secure employment.

Child labor is strictly forbidden. Workers must be at least 15 years old or meet the local legal minimum working age, whichever is higher. Young workers under 18 must not be exposed to hazardous conditions or night shifts, and must be protected through proper management and training.

Working hours must comply with local laws, and a normal workweek may not exceed 60 working hours and should include at least 1 day off. Wages and benefits must meet or exceed legal requirements and provide equal pay for equal work.

Discrimination and harassment of any kind are not tolerated. Suppliers must maintain a workplace free from intimidation, violence or abuse, and support workers' rights to freedom of association, collective bargaining, and open communication without retaliation.



HEALTH, SAFETY & QUALITY

A safe and healthy workplace is essential for the well-being of workers and the delivery of high-quality products. Suppliers must actively identify and manage workplace hazards to protect employees and surrounding communities.

Suppliers are expected to provide appropriate personal protective equipment and training at no cost, maintain clean and safe facilities, and ensure emergency preparedness through regular drills and clear evacuation plans. Workers must have access to clean drinking water, sanitary food preparation areas, and secure housing if provided by the employer.

Pregnant and nursing women are to be adequately accommodated and hazards to unborn and newborn children assessed and mitigated. Workers are to be encouraged to raise any health or safety concerns without retaliation.

Quality management systems must be in place to ensure that all products meet Theuma's quality standards and comply with applicable laws and regulations.

Theuma prioritizes maintaining appropriate quality and a stable supply by collaborating with suppliers. We expect you to consistently meet our quality requirements, and strive to secure the supply in any contingency.



ENVIRONMENT

Theuma is deeply committed to environmental sustainability. Suppliers are expected to minimize their environmental footprint through responsible practices that protect natural resources and reduce pollution.

All operations must comply with environmental laws, including obtaining and maintaining permits and records, including on the origins of a material/product. Hazardous materials must be safely handled, labeled, and disposed of. Waste, emissions, and water usage must be carefully tracked and reported.

Suppliers should actively pursue initiatives to reduce greenhouse gas emissions; energy and water consumption and waste. Complete emissions and waste data shall be gathered at least yearly and shared with Theuma when requested at the maximum level of granularity.

Theuma strongly supports the use of sustainably sourced materials (e.g. FSC wood), ensuring that our products do not harm the environment or biodiversity.



BUSINESS ETHICS & COMPLIANCE

Suppliers must conduct all business with integrity, transparency, and accountability. Theuma has zero tolerance for bribery, corruption, extortion, or embezzlement.

Business decisions should never be influenced by personal gain. Suppliers must comply with anti-trust laws and compete fairly. Confidential information and intellectual property must be safeguarded at all times.

Theuma also expects responsible sourcing of minerals in line with OECD guidance and strict adherence to privacy and data protection laws.

Suppliers must have secure mechanisms for whistleblowers to report unethical behavior confidentially and without fear of retaliation.



MANAGEMENT SYSTEMS

Suppliers are required to establish management systems that support compliance with this Code and foster continuous improvement.

These systems must include clear policies endorsed by senior management, regular risk assessments, training programs for staff, and measurable performance objectives. Suppliers must communicate expectations throughout their supply chains and monitor compliance regularly.

If deviations from this Supplier Code of Conduct are observed or suspected, Theuma is to be informed.



CLOSING STATEMENT

Theuma believes that strong partnerships are built on trust, transparency, and shared responsibility. By adhering to this Supplier Code of Conduct, our suppliers play a vital role in driving positive change, protecting people and the planet, and ensuring sustainable business growth for the future.

Theuma reserves the right to conduct audits or assessments to ensure supplier's compliance and will get in contact if there is a reason for concern.

This is a code of conduct with general requirements to all suppliers. Specific individual contracts on a higher standard supersede these general requirements.

Collaboration and long-term, trustworthy relationships are at the core of our values. We are committed to building strong and reliable partnerships with our suppliers.



We expect our partners to engage in fair and balanced cooperation, continuously enhance our joint efforts, and promote shared success and mutual growth. By working together in this way, we can create a strong and resilient supply chain for the future.







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