



Axalta Supplier Code of Conduct

Updated: August 2021

Axalta is committed to doing business ethically and responsibly and expects the same of its suppliers. In support of this commitment, Axalta has developed a Supplier Code of Conduct to convey its expectations of its suppliers with regards to compliance with applicable laws, standards and business practices. This Code is aligned with the principles of the United Nations Global Compact. Axalta suppliers should review the list of expectations below, as well as the Axalta Code of Business Conduct and Ethics, and take appropriate steps to ensure compliance. Axalta also expects our suppliers to take appropriate steps to implement these standards with their suppliers and subcontractors. Axalta may seek to verify its suppliers' compliance with this Code, including by requesting self-assessments or conducting audits. Violations may be grounds for termination of the business relationship with the Supplier.

1. **Act in compliance with laws.** Suppliers shall maintain awareness of and comply with all applicable laws, standards and regulations of the countries where they operate, including – where applicable – anticorruption laws, customs regulations, export and trade control laws, and fair dealing and competition laws. Where local laws or regulations are stricter than the requirements of this Code, we expect our suppliers to comply with local laws and regulations.
2. **Do business ethically.** Suppliers shall not pay bribes or provide kickbacks or give anything of value to secure business or any business advantage.
3. **Avoid inappropriate gifts, meals and entertainment.** Suppliers shall not provide or offer gifts, meals or entertainment (including cash or cash equivalents) that could or could appear to inappropriately influence a business decision. Business courtesies of nominal value may be offered only in a manner consistent with the Axalta Code of Business Conduct and Ethics.
4. **Demonstrate respect for people.** Suppliers shall seek to foster a diverse and inclusive workforce, provide a workplace free of discrimination and harassment, and treat employees fairly, including with respect to wages, working hours, benefits, working conditions, and freedom of association.
5. **Respect fundamental human rights.** Suppliers shall ensure that the products and materials they sell to Axalta are not created with child labor, forced labor, modern slavery or through the victims of human trafficking and shall take reasonable steps to eliminate such practices in their supply chains.
6. **Provide a safe working environment.** Suppliers shall provide a safe, clean and healthy working environment that complies with all relevant laws, rules, and regulations and shall strive to prevent occupational injuries and safety incidents.
7. **Comply with environmental regulations.** Suppliers shall conduct their businesses in a manner compliant with applicable environmental laws, regulations and industry standards and shall support Axalta's efforts to operate sustainably, including with respect to air quality; energy efficiency, renewable energy, and GHG emissions; sustainable resources management and waste reduction; water quality and consumption; and responsible chemical management.



8. **Source minerals and raw materials responsibly.** Suppliers shall cooperate with Axalta's efforts to ensure it is sourcing its minerals and other raw materials responsibly, including responding to traceability and reporting requests as well as supporting Axalta's compliance with conflict minerals reporting rules.
9. **Keep accurate books and records.** Suppliers shall maintain accurate books and business records as required by applicable legal and regulatory requirements and accepted accounting practices.
10. **Manage and protect information.** Suppliers shall take appropriate steps to protect Axalta's proprietary or confidential information, including employee information, customer data, intellectual property and trade secrets.

Where permitted by law, suppliers may report suspected violations of this Supplier Code of Conduct to Axalta's Ethics Hotline via <https://www.lighthouse-services.com/axaltacs> or to:

Axalta Coating Systems

Attention: Chief Compliance Officer

50 Applied Card Way, Suite 300

Glen Mills, PA 19342