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# Policy on Supplier Sustainability and Responsible Business Basic Requirements



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## **1. Purpose of the Document and Executive Summary**

As part of its responsible business operations, Dryvit Profi Kft. considers it important that its suppliers, subcontractors, service providers and other contractual partners comply with the applicable laws, ethical standards, occupational health and safety, environmental protection and social responsibility principles during their activities.

The purpose of this document is to define, in a uniform and documented manner, the basic sustainability and responsible business requirements applicable to suppliers and subcontractors, building on the company's existing internal policies. This policy supports supplier compliance, partner evaluation, contract preparation, project execution and responsible supply chain management.

The requirements are applied on a risk-proportionate basis. This means that the level of detail and the required level of evidence relating to expectations towards a supplier or subcontractor shall be determined based on the partner's activity, the subject of the contract, the place of work, the environmental and occupational health and safety risks, and the nature of the business relationship.

## **2. Scope of Application of the Requirements System**

The company is committed to supporting responsible, lawful, safe and environmentally conscious operations. The purpose of this policy is to provide a uniform framework for the basic social, ethical, occupational health and safety, environmental protection and business compliance expectations applicable to suppliers and subcontractors.

The application of the requirements shall be aligned with the nature of the supplier's or subcontractor's activity, its risk level, contractual role, presence at the work site and impact on the company's projects. This policy shall be interpreted together with the existing internal documents, contractual terms, project requirements, occupational health and safety, environmental protection and quality requirements.

In managing supplier and subcontractor relationships, the company seeks to gradually incorporate sustainability and responsible business aspects into its supplier qualification, partner evaluation, contract preparation and project execution practices, in line with the nature of its operations, project risks and partner expectations. This policy may serve as a basis for future internal assessments, the further development of supplier requirements, and the more structured management of related documents and data.

## **3. Related Internal Policies and Documents**

This supplier requirements system does not stand alone; it is based on the company's existing ethical, labour, occupational health and safety, environmental protection, whistleblowing and quality management documents. The table below shows which responsible business, sustainability and supplier compliance areas are supported by the existing internal documents.

| Document name                                                       | Document type | Document number | Relevant content                                                                                                                                                                     |
|---------------------------------------------------------------------|---------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Quality Assurance Plan                                              | Procedure     | ME 15-01        | Quality management, documented compliance, traceability and requirements related to product and service conformity.                                                                  |
| Environmental Protection Policy                                     | Policy        | SZA 07-01       | Environmental legal compliance, pollution prevention, waste management, energy and water use, reduction of environmental impacts.                                                    |
| Occupational Health and Safety Policy                               | Policy        | SZA 02-01       | Occupational health and safety, work that does not endanger health, accident prevention, occupational safety requirements.                                                           |
| Code of Ethics and Business Conduct                                 | Policy        | SZA 04-02       | Anti-corruption, fair competition, business ethics, ethical expectations, fair operation, conflict of interest, expectations related to business partners.                           |
| Internal Whistleblowing and Reporting System Policy                 | Policy        | SZA 16-01       | Reporting of legal violations, ethical issues and misconduct, protection of whistleblowers, protection against retaliation.                                                          |
| Supplier Sustainability and Responsible Business Basic Requirements | Policy        | SZA 18-01       | Summary of sustainability, ethical, occupational health and safety, environmental protection and responsible business basic requirements applicable to suppliers and subcontractors. |

## 4. Scope and Principles of Application

The scope of this document extends to the company's suppliers, subcontractors, service providers and other contractual partners, provided that their activities are related to the company's operations, projects, construction, operational or other contractual tasks.

The application of the requirements shall be aligned with the nature of the partner's activity, contractual role, risk level and impact on the company's operations. Accordingly, the same level of evidence or evaluation depth is not required for all suppliers. Special attention shall be paid to suppliers and subcontractors who perform activities at work sites, use or transport hazardous substances, carry out work involving significant environmental or occupational health and safety risks, provide critical materials, products or services, or whose performance directly affects customer, legal or quality compliance.

When applying this document, the following principles shall be taken into account:

### *Legal compliance:*

The supplier shall comply with the laws, regulatory requirements, permitting conditions, as well as contractual and customer requirements applicable to its activities.

### *Relevance:*

Each requirement shall be interpreted in accordance with the specific supplier activity, the nature of the performance and the related risks. Not all requirements are applicable in the same way to every supplier or subcontractor.

Risk proportionality:

In the case of a higher-risk supplier or subcontractor, more detailed declarations, documents, certificates or other compliance information may be requested. In the case of lower-risk suppliers, acknowledgement of the basic requirements and the general expectation of legal compliance may be sufficient.

Documented expectation:

The requirements set out in this document may be used as an internal basis for supplier qualification, partner evaluation and contract preparation. The purpose of the requirements is to provide a uniform and transparent framework for responsible business, occupational health and safety, environmental protection and sustainability expectations applicable to suppliers and subcontractors.

Gradual development:

The company seeks to gradually incorporate supplier sustainability and responsible business aspects into its supplier qualification and evaluation practices, in line with the nature of its operations, partner expectations and available resources.

## **5. Supplier Sustainability and Responsible Business Basic Requirements**

The following sections summarise the sustainability, social responsibility, ethical, labour, occupational health and safety, environmental protection and responsible business basic requirements applied to the company's suppliers, subcontractors, service providers and other contractual partners.

Considering the company's construction activities, the requirements apply in particular to subcontractors and suppliers who perform activities at construction work sites, provide construction materials, machinery, equipment or services, or participate in waste management, transport, operation, maintenance or other project-related tasks.

The requirements shall be interpreted together with the company's existing internal policies, contractual practices, project requirements, occupational health and safety and environmental protection requirements, as well as supplier and subcontractor qualification criteria. The application of each requirement shall be aligned with the nature, risk level, contractual role and work site presence of the given supplier or subcontractor, and with its impact on the company's projects.

The purpose of this document is to provide a uniform and transparent framework for responsible business, labour, occupational health and safety, environmental protection and sustainability

expectations applicable to suppliers and subcontractors, and to support the processes of supplier qualification, partner evaluation, contract preparation and project execution.

### **5.1. Human Rights, Child Labour and Young Workers**

The supplier and subcontractor shall respect human dignity, fundamental human rights, and the requirements related to the lawful and fair employment of workers.

The supplier shall not use child labour and shall not engage any contributor, subcontractor or labour agency that uses child labour. Young workers may only be employed in compliance with applicable laws, taking into account the protection requirements appropriate to their age, health condition and the nature of the work performed.

At construction work sites, it is particularly important that a young worker or trainee only performs tasks that they are legally permitted to carry out, that do not endanger their health, safety or development, and for which the necessary training, supervision and protective measures have been provided.

### **5.2. Wages, Benefits and Working Time**

The supplier and subcontractor shall comply with all applicable laws relating to wages, benefits, working time, rest periods, leave, overtime compensation and other employment conditions.

Employment shall take place within a lawful framework, ensuring the remuneration, allowances, benefits and records to which employees are entitled. The supplier shall ensure that employees are aware of the essential conditions of their work, in particular working time, remuneration, place of work, job-related expectations and safety requirements.

The company does not request individual personal wage data; however, it expects suppliers and subcontractors to comply with the principles of lawful and fair employment and not to place their employees in a vulnerable or unlawful situation.

### **5.3. Prohibition of Modern Slavery, Forced Labour and Human Trafficking**

The supplier and subcontractor shall not use slavery, servitude, forced labour, compulsory labour, practices related to human trafficking, or any form of employment that violates the personal freedom, freedom of movement or human dignity of workers.

The unlawful withholding of personal documents, misleading, intimidating or threatening workers, exploiting their vulnerable situation, or applying working conditions that force employees to maintain an employment relationship or continue working against their will is prohibited.

The company expects the supplier to strive to ensure lawful and ethical employment practices also in relation to the labour agencies, subcontractors and other contributors engaged by the supplier.

#### **5.4. Ethical Recruitment**

The supplier and subcontractor shall strive to apply ethical recruitment practices. During recruitment, selection and employment, misleading information, exploitation of a vulnerable situation, practices that hinder lawful employment, and the application of unfair conditions towards workers are prohibited.

The supplier shall ensure that employees are informed, before starting work, of the essential information relating to their job, work site, working schedule, remuneration and occupational health and safety requirements.

In the case of activities performed at construction work sites, it is a key expectation that the persons involved in the performance of the work participate lawfully, with the appropriate qualifications, training, permits and fitness for work.

#### **5.5. Freedom of Association and Collective Bargaining**

The supplier shall respect freedom of association and the right to collective bargaining, where these are applicable under the laws of the relevant country.

Employees shall not be subject to discrimination, intimidation or retaliation because they participate in lawful employee representation activities, join an employee representative organisation, or exercise their employee rights in a lawful manner.

#### **5.6. Prohibition of Discrimination and Harassment, Women's Rights and Inclusion**

The supplier and subcontractor shall not apply discrimination, harassment, degrading treatment, threats or intimidation. Unlawful discrimination based on gender, age, marital status, nationality, origin, religion, belief, disability, health condition or any other protected characteristic is prohibited.

The supplier is expected to respect women's rights, the principles of diversity, equality and inclusion, as well as the human dignity of employees. During work, basic respect, a cooperative working environment and the conditions for safe work free from harassment shall be ensured.

At construction work sites, professional and respectful communication is also expected, as well as appropriate conduct towards colleagues, subcontractors, customer representatives and local stakeholders.

#### **5.7. Rights of minorities, indigenous peoples and local communities**

The supplier and subcontractor shall respect the rights of minorities, local communities and, where relevant to the activity concerned, indigenous peoples.

Taking into account the company's construction-related activities, this requirement shall primarily be interpreted in relation to lawful work performance, land use, presence on the worksite, traffic,

management of noise and dust emissions, and consideration of the interests of the local population and affected stakeholders, without harming community interests.

The supplier shall refrain from any conduct that unjustifiably infringes upon the rights, safety, peace or legitimate interests of local communities.

### **5.8. Rights Related to Land, Forests and Waters and Prohibition of Forced Eviction**

Suppliers and subcontractors are expected to respect lawful use, ownership and community rights related to land, forests, waters and other natural resources during their activities.

Participation in unlawful forced eviction, unlawful land use or practices that violate community rights is prohibited. During construction activities, it is particularly important that the supplier and subcontractor perform their activities only within the area defined in the contract, permits, work site handover documents or other lawful provisions.

During the performance of work, the supplier shall take into account the requirements relating to the use of the area, access, closure, material storage, earthworks, water protection and environmental protection.

### **5.9. Use of Private or Public Security Services**

If the supplier or subcontractor uses private or public security services, their operation shall be ensured in a lawful and proportionate manner, while respecting human dignity.

The use of security services shall not involve unjustified violence, intimidation, unlawful conduct, or the violation of the rights of employees, subcontractors, customer representatives, visitors or local communities.

At construction work sites, guarding, access control, property protection and work site security tasks shall be performed in accordance with the applicable laws, customer expectations and project requirements.

### **5.10. Health and Safety**

The supplier and subcontractor shall comply with all applicable health protection, occupational health and safety, fire safety and security laws, as well as the rules applicable to the given construction work site, project, customer requirements and company requirements.

In the case of activities performed at construction work sites, it is a key expectation that the subcontractor only involves employees, contributors or machine operators who have the necessary training, qualifications, permits, medical fitness, personal protective equipment and are in a condition suitable for work.

Machinery, equipment, scaffolding, lifting equipment, hand tools and other work equipment used for the work shall comply with the applicable safety and technical requirements. The

supplier and subcontractor shall ensure that their employees use work equipment properly and safely.

The supplier and subcontractor shall identify and manage the risks of the work they perform and, where necessary, report them to the company, the main contractor or the customer. Special attention shall be paid to work at height, earthworks, demolition activities, lifting operations, machine-assisted work, electrical works, the use of hazardous substances, traffic routes, openings, level differences and other hazardous work areas.

Accidents, dangerous occurrences, near misses, fire incidents, environmental incidents or emergency situations occurring at the work site shall be reported and managed without delay in accordance with the applicable requirements. The supplier and subcontractor shall cooperate in defining and implementing corrective actions.

### **5.11. Anti-Corruption, Anti-Money Laundering and Conflict of Interest**

The supplier and subcontractor shall not engage in corruption, bribery, trading in influence, conduct related to money laundering, misleading business practices or obtaining unfair advantages.

Any benefit, gift, advantage, promise or agreement that may be capable of influencing the integrity, impartiality or transparency of business decisions is prohibited.

The supplier shall report any known conflict of interest situations that may influence the integrity, impartiality or transparency of business decisions. This may include, in particular, situations where the supplier, subcontractor or its representative may be involved in a decision, procurement, performance certification or contractual relationship through personal, family, economic or other interests.

### **5.12. Data Protection and Data Security**

The supplier and subcontractor shall handle business, personal, technical, financial, contractual and other confidential information provided to them with appropriate care.

When processing personal data, the supplier shall comply with the applicable data protection laws and contractual obligations. Access to information shall be granted only to authorised persons, and such information may not be used for unauthorised purposes or disclosed to third parties.

In the case of construction projects, the supplier shall treat as confidential, in particular, technical plans, budgets, contractual data, quotations, project schedules, customer information, site documentation, photographs and other business or technical data.

### **5.13. Financial Responsibility, Accurate Records and Disclosure of Information**

The supplier and subcontractor are expected to maintain accurate, truthful and traceable financial, performance, quality and contractual records.

Information, declarations, performance certificates, invoices, certificates, records, measurement reports, material conformity documents and other evidence submitted to the company shall contain truthful data.

The supplier or subcontractor shall not submit misleading, incomplete or false information. When disclosing, transmitting or sharing information with third parties, legal, contractual and confidentiality requirements shall be complied with.

### **5.14. Fair Market Conduct and Competition Law Compliance**

The supplier and subcontractor shall refrain from any conduct that may violate the requirements of fair competition, competition law or antitrust rules.

The unlawful coordination of prices, markets, customers or business opportunities, unlawful exchange of information with competitors, and any agreement or concerted practice that restricts or distorts market competition are prohibited.

The company expects suppliers and subcontractors to demonstrate fair, transparent and lawful market conduct during their tendering, contracting and performance processes.

### **5.15. Construction Materials, Products, Equipment and Documented Conformity**

The supplier shall not supply construction materials, products, equipment, fittings, components or services that are counterfeit, of unverified origin, of inadequate quality, accompanied by misleading documentation, or unlawfully placed on the market.

The supplier shall ensure the contractual, technical, quality, occupational health and safety, environmental and legal conformity of the materials, products, equipment and services supplied by it. Where required for the given product or material, the necessary declaration of performance, conformity document, technical data sheet, quality certificate, certificate, safety data sheet or other supporting document shall be provided.

The supplier shall cooperate in the investigation, segregation, replacement or corrective action related to non-conforming, defective, damaged materials and products, or those with incomplete documentation or questionable origin.

### **5.16. Intellectual Property**

The supplier and subcontractor shall respect intellectual property rights, including in particular copyrights, trademarks, technical documentation, plans, technologies, trade secrets, know-how and other protected information.

Documentation provided by the company, the customer or any other entitled party may only be used for the purposes of cooperation, tendering, contractual performance or project execution. The unauthorised copying, transmission, disclosure or transfer of such documentation to third parties is prohibited, unless permitted by a contract, law or the written consent of the entitled party.

### **5.17. Export Controls and Economic Sanctions**

Where relevant to the given supplier activity, the supplier shall comply with the laws and requirements relating to export controls, economic sanctions and trade restrictions.

The supplier shall not participate in any transaction that violates laws, sanctions requirements or trade restrictions. This is particularly important in the case of products, equipment, technologies, machinery or services where the country of origin, destination, use or involved partner may be relevant from a sanctions or export control perspective.

### **5.18. Reporting of Misconduct and Protection Against Retaliation**

The company expects the supplier and subcontractor to ensure the possibility of reporting misconduct, legal violations, ethical issues, and occupational health and safety or environmental risks.

Retaliation is prohibited against persons who report concerns in good faith, indicate a legal violation or risk, or cooperate in an investigation.

In its own operations, the company handles such reports in accordance with its internal whistleblowing and reporting system policy. Reports received from suppliers and subcontractors in relation to the company or its projects shall be handled by the company in accordance with the applicable internal rules, legal requirements and contractual framework.

### **5.19. GHG Emissions, Energy Efficiency, Renewable Energy and Decarbonisation**

Suppliers and subcontractors are expected to strive to rationalise energy use, improve energy efficiency and reduce greenhouse gas emissions during their activities.

In the case of construction activities, this requirement may apply in particular to the rationalisation of construction machinery, transport vehicles, temporary energy supply, energy use at sites and work areas, transport routes, material handling and logistics processes.

Where technically and economically reasonably feasible, the supplier may seek to use lower-emission machinery, equipment, vehicles, technologies or renewable energy sources, or give preference to solutions that reduce the environmental impact of the project.

The request for emissions, energy use or fuel consumption data may be made in accordance with the significance, risk level and contractual role of the given supplier's activity.

## **5.20. Water and Soil Protection During Construction Activities**

The supplier and subcontractor shall strive to protect water quality, reasonably reduce water consumption and ensure responsible water management.

During construction activities, special attention shall be paid to the protection of surface waters and groundwater, stormwater drainage systems, utilities, soil and surrounding areas. The release of oil, fuel, chemicals, cement slurry, paint, solvents, hazardous substances or other pollutants into the soil, sewer system, watercourse or natural water body shall be prevented.

In the case of earthworks, demolition activities, storage, material handling, machine-assisted work, the use of hazardous substances or activities involving a risk of pollution, the supplier shall comply with the applicable legal, regulatory, customer and project requirements. In the event of an environmental incident, leakage, spill or suspected pollution, the supplier shall take immediate action and report the incident.

## **5.21. Air Quality, Dust and Noise Emissions**

The supplier and subcontractor shall strive to protect air quality and reduce dust generation, air pollutant emissions and other impacts on air quality.

In the case of construction, demolition, earthworks, cutting, grinding, loading, transport or material handling activities, measures shall be taken as necessary to reduce dust generation, ensure the proper storage and covering of materials, keep work site roads clean, and prevent unjustified dust impacts on surrounding areas.

Noise emissions shall be managed in accordance with the applicable legal, regulatory, customer and project requirements, with particular attention to reducing impacts on residents, workplaces and the environment. The supplier shall strive to prevent unnecessary noise impacts, maintain machinery and equipment in proper technical condition, and organise noisy work processes in a reasonable manner.

## **5.22. Responsible Handling of Hazardous Substances and Chemicals**

Chemicals, hazardous substances and hazardous mixtures shall be handled, stored, used and disposed of responsibly, in accordance with the applicable laws, safety data sheets and occupational health and safety and environmental protection requirements.

The supplier and subcontractor shall ensure that the necessary safety data sheets and handling information are available for the chemicals, hazardous substances and hazardous mixtures used at the construction work site. Employees shall be informed about the risks, protective measures and required actions related to hazardous substances.

Special attention shall be paid to the proper storage and use of fuels, oils, lubricants, paints, solvents, adhesives, sealants, concrete admixtures, cleaning agents and other hazardous substances or materials that may pose a risk to the environment. Any spill, leakage or environmental incident shall be managed and reported without delay.

### **5.23. Construction and Demolition Waste, Resource Management and Recycling**

The supplier and subcontractor are expected to strive for sustainable resource management. This includes the rationalisation of material, energy and water use, the reduction of waste, and the preference for environmentally more favourable solutions, where technically and economically reasonably feasible.

The supplier shall strive to prevent and reduce the generation of waste, and to support reuse, recycling and selective waste collection. In the case of construction and demolition activities, the separate collection of waste, handling by material type, proper separation of hazardous and non-hazardous waste, and the lawful removal and treatment of waste are particularly important.

The collection, storage, transport and treatment of waste shall be carried out in accordance with the applicable laws, project requirements and customer requirements. The supplier shall cooperate in providing waste records, certificates, delivery notes, weighbridge tickets or other supporting documents where this is necessary for performance or legal compliance.

### **5.24. Natural Environment, Biodiversity, Land Use and Soil Quality**

The supplier and subcontractor shall, where relevant to their activities, take into account the protection of animals, the preservation of biodiversity, responsible land use, the avoidance of deforestation, and the prevention of unjustified damage to natural habitats.

During construction activities, it is particularly important that work is carried out within the designated work site, in compliance with the applicable permits, plans, site organisation requirements and environmental protection requirements. The supplier shall strive to prevent unjustified damage to green areas, trees, vegetation, natural habitats, soil and surrounding areas.

The supplier shall strive to protect soil quality, prevent soil contamination and immediately report any suspected contamination, particularly during earthworks, demolition, storage, transport, machine-assisted work or activities involving hazardous substances.

### **5.25. Communication of Requirements to Direct Suppliers and Subcontractors**

The company expects its suppliers and subcontractors to communicate the basic sustainability and responsible business requirements set out in this document – in line with their activities, risks and contractual roles – to their own employees, contributors, further subcontractors, suppliers and service providers, where they participate in the performance of work for the company.

The supplier or subcontractor is responsible for ensuring that the contributors engaged by them comply with the applicable legal, occupational health and safety, environmental protection, ethical, quality and contractual requirements during the performance of work for the company.

In the case of construction projects, this applies in particular to further subcontractors, machine operators, suppliers, carriers, waste management providers, maintenance providers, security service providers and other contributors performing activities at the work site.

## 5.26. Communication within the Supply Chain and Cooperation

As part of responsible supply chain management, the company seeks to ensure that the basic requirements defined in this document are also communicated to the relevant actors within the supply chain. The communication of requirements shall be aligned with the role of the given supplier, the nature of the performance and the related risks.

In the event of a serious risk, a known legal violation, customer expectation or contractual requirement, the company is entitled to request reasonable measures, information or evidence from the direct supplier.

The purpose of communicating the requirements is to encourage responsible operations, support legal and contractual compliance, and reduce occupational health and safety, environmental, quality and ethical risks in the company's projects and supplier relationships.

## 6. Compliance Management, Declarations and Measures

This document serves as internal support for supplier qualification, partner evaluation, contract preparation and project execution. The company applies the sustainability and responsible business basic requirements towards suppliers and subcontractors on a risk-proportionate basis.

The purpose of the risk-proportionate approach is to ensure that, in the case of partners presenting higher occupational health and safety, environmental, quality, contractual or customer-related risks, a more detailed evaluation, document request or declaration may be required, while for lower-risk partners the review of basic legal, ethical and contractual compliance may be sufficient.

The application of the requirements does not mean the same depth of control for every supplier. The extent of the evaluation shall be determined based on the given partner's activity, contractual role, work site presence, the nature of the performance, and its impact on the company's projects and compliance.

### 6.1. Supplier Risk Categories

| Category    | Example                                                                                                                             | Management level                                                                                                                                                              |
|-------------|-------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Low risk    | Office supplies, general administrative services, low-value occasional purchases, service provider without work site presence.      | Basic legal, ethical and contractual expectations. Detailed sustainability documentation is generally not required.                                                           |
| Medium risk | Regular material supplier, maintenance service provider, transport service provider, activity involving limited work site presence. | Recording of supplier or subcontractor basic data and compliance information; request for occupational health and safety, quality or environmental documents where necessary. |

| Category  | Example                                                                                                                                                                                                                                                         | Management level                                                                                                                                                                                                        |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| High risk | Construction subcontractor, partner working at a work site, partner using or transporting hazardous substances, waste management provider, critical technological partner, activity involving significant occupational health and safety or environmental risk. | More detailed document request; review of occupational health and safety, environmental, quality and responsible business requirements. Where necessary, a declaration, evidence or corrective action may be requested. |

## 6.2. Possible Documents, Declarations and Evidence

During supplier or subcontractor evaluation, contract preparation or project execution, the company may request documents or declarations in accordance with the given partner's activity and risk level.

These may include in particular:

- recording of supplier or subcontractor basic data and compliance information,
- acknowledgement of the Supplier Sustainability and Responsible Business Basic Requirements,
- evidence of company data, permits, authorisations and insurance,
- occupational health and safety documents, training records and qualifications,
- medical fitness, machine operator qualifications and special work permits,
- safety data sheets and a list of hazardous substances,
- waste management documents and waste transport or treatment authorisations,
- declarations of performance, conformity documents, technical data sheets or quality certificates relating to construction materials, products and equipment,
- ISO or other management system certificates, where relevant to the given activity,
- ethical, anti-corruption, data protection or confidentiality declarations, where justified by the nature of the activity,
- in the case of a serious or known risk, information on corrective action or an action plan.

## 6.3. Management of Non-Conformities, Deficiencies and Corrective Actions

If the supplier or subcontractor does not comply with the basic requirements set out in this document, or if the company identifies a deficiency, non-conformity, legal compliance issue, occupational health and safety, environmental, ethical or quality risk, the company is entitled to request information, additional documents, declarations or corrective actions.

In the event of a serious or repeated non-conformity, the company is entitled to review the supplier qualification, modify the result of the partner evaluation, amend the conditions of

cooperation, restrict the award of new assignments, and, where necessary, apply contractual or legal consequences.

The company seeks to manage compliance issues primarily through consultation, information sharing and corrective actions, where this is possible based on the severity and risk of the given case and the contractual situation.

## **7. Responsibilities and Internal Operation**

The application of the Supplier Sustainability and Responsible Business Basic Requirements shall be aligned with the company's internal operations, supplier relationships and projects. The operation of the requirements system requires the cooperation of several relevant areas.

The quality assurance area is responsible for maintaining the document, supporting supplier qualification and partner evaluation criteria, and organising the related documents and information. Quality assurance performs a coordinating role; however, the relevant professional areas are responsible for providing the specific technical data, evidence and compliance information.

The technical, project management, occupational health and safety, environmental protection, financial and other relevant areas support the evaluation of suppliers and subcontractors in relation to their own responsibilities. This may include, in particular, providing information on work site compliance, occupational health and safety and environmental documents, conformity evidence for construction materials, contractual data, company data, permits, insurance and other relevant information.

Management is responsible for approving the requirements system, supporting its application, and making decisions related to significant supplier risks, serious non-conformities or contractual consequences.

The company seeks to ensure that the application of the requirements is proportionate, documented and manageable from an operational perspective. The objective is to support legal, occupational health and safety, environmental, quality and ethical compliance, as well as the conscious management of supplier and subcontractor risks.

## **8. Management of Documents, Data and Records**

Documents, data and evidence related to suppliers and subcontractors shall be managed in accordance with the company's internal document management, data protection, quality management and contractual practices.

During supplier qualification, partner evaluation, contract preparation and project execution, the company may manage supplier basic data, compliance information, declarations, permits, certificates, occupational health and safety, environmental, quality or other supporting documents, in line with the given partner's activity, contractual role and risk level.

The purpose of such documents is to support legal, contractual, occupational health and safety, environmental, quality and responsible business compliance. The company seeks to request only those documents and data that are justified and relevant in relation to the given supplier activity.

Documents requested from suppliers or subcontractors may include, in particular, company data, permits, insurance documents, occupational health and safety training records, qualifications, medical fitness certificates, machine operator permits, safety data sheets, information on hazardous substances, waste management documents, declarations of performance, conformity documents, technical data sheets, quality certificates, certificates or other evidence related to the performance of work.

When managing documents, the requirements relating to the protection of personal data, trade secrets, contractual confidentiality and information security shall be taken into account. Documents containing personal data may only be managed to the extent necessary for the lawful purpose.

The company retains supplier and subcontractor documents in accordance with the applicable internal rules, contractual requirements, legal provisions and project requirements. The purpose of organising the documents is to ensure that, where necessary, the compliance, authorisation and performance of the supplier or subcontractor, as well as the management of any non-conformities, deficiencies or corrective actions, can be retrieved.

The management of data related to sustainability and responsible business aspects may be developed gradually, in line with the company's operations and partner expectations. This may include more uniform registration of supplier data, more structured management of occupational health and safety, environmental and quality information, and more targeted monitoring of documentation for higher-risk suppliers.

## **9. Review and Amendment**

The Supplier Sustainability and Responsible Business Basic Requirements defined in this policy shall be reviewed by the company as necessary, but at least annually.

A review may be justified in particular in the event of changes in legislation, significant changes in customer or partner expectations, changes in internal regulations, new types of project risks, serious or repeated supplier or subcontractor non-conformities, occupational health and safety, environmental or quality incidents, or changes in supplier and subcontractor evaluation practices.

The purpose of the review is to ensure that the content of the policy remains aligned with the company's operations, construction activities, existing internal policies, project requirements, contractual practices and supplier relationships.

Any amendment to the policy shall be managed in accordance with the company's internal document management rules. In the event of an amendment, it shall be ensured that the current effective version is available to the relevant internal users.

## 10. Final Provisions

This policy summarises the sustainability and responsible business basic requirements applicable to the company's suppliers, subcontractors, service providers and other contractual partners.

This policy shall be interpreted together with the existing internal policies, contractual terms, project requirements, occupational health and safety, environmental protection and quality requirements.

The application of the requirements set out in this document shall be aligned with the activity, risk level and contractual role of the given supplier or subcontractor. The purpose of this document is to support lawful, ethical, safe, environmentally conscious and responsible supplier cooperation.

Approved by:



László Bana

Managing Director

