



Your Dreams, Our Challenge

Supplier Commitment Declaration to the AGC Group Code of Conduct

AGC Glass Europe, AGC Automotive Europe, and all of our subsidiaries in Europe and Morocco (hereafter named as “AGC”), as subsidiaries of AGC Inc., a leader in the production of flat glass, see the importance of following appropriate due diligence procedures and the collaboration with our suppliers and business partners.

Our selection process for suppliers and business partners not only takes into account the business capabilities, quality, efficiency, added value, and costs of the products or services provided, but also determines their level of commitment to social, governance, and environmental values which are sought after by AGC. These values are considered as essential requirements before entering any business relationship with AGC and are encompassed on the [AGC Group Code of Conduct](#).

AGC expects all of its suppliers and business partners to comply with the legal requirements at international, EU, and national levels where they operate, and to follow ethical and sustainable business practices (such as anti-corruption, anti-bribery, Antitrust and Competition Law, anti-money laundering, etc.)

The **AGC Supplier Code of Conduct** is applicable to all persons or entities that supply goods or provide services in any capacity and under any legal relationship to AGC. The document gives an overview of the main principles and values that must be complied with, and that must be accepted by all suppliers and business partners of AGC. Furthermore, it is an integral part of AGC’s business relationships, and as such, it shall be included in any agreement entered with the company.

The supplier or business partner must declare their commitment to adhere to our AGC Supplier Code of Conduct through the commitment declaration. Commitment to the AGC Supplier Code of Conduct is considered to be an acceptance to the entirety of the document and no “opt-out” is possible. In case of breach of the values, principles, or requirements committed on the declaration, AGC has the right to implement any preventive or remedial measures, or if found necessary, terminate the relationship with your company.

Davide Cappellino (Dec 10, 2024 14:44 GMT+1)

Davide Cappellino
President of AGC Glass Europe

Meunier JM (Dec 10, 2024 14:55 GMT+1)

Jean-Marc Meunier
Regional President AGC Automotive Europe



Your Dreams, Our Challenge

AGC Supplier Code of Conduct

We, AGC Glass Europe, AGC Automotive Europe, and all our subsidiaries in Europe and Morocco (hereafter named as “AGC”), as subsidiaries of AGC Inc., a leader in the production of flat glass, hereby affirm our commitment to the highest standards of legal and ethical business conduct in the production, processing and distribution of flat glass for the building industry (external glazing and interior decorative glass), the automotive industry (OEM and replacement glass) and various other sectors (transport, solar power and high-tech applications) in which the company operates.

AGC adheres to the [AGC Group Code of Conduct](#) and to the [AGC Charter of Corporate Behavior and Policies](#) which set forth the requirements to ensure all of AGC’s companies, suppliers, and business partners do business with integrity and ethics, and according to applicable laws, rules, regulations and policies.

As a socially responsible group of companies, AGC makes every effort to ensure compliance with our values, both on our downstream and upstream supply chains. Hence, we collaborate and expect full alignment with our suppliers and business partners as part of strict due diligence procedures and compliance requirements in accordance with international, national and corporate standards.

Following these standards and requirements, AGC does not select its suppliers and business partners based solely on the competitiveness or quality of their products and services, but also on their compliance with the applicable law, international standards, best business practices, environmental, social and sustainable action plans, and the protection of Labour Rights and Human Rights.

The company has set a clear strategy on how to comply and improve in all CSR/ESG matters; therefore, we expect all our suppliers and business partners to align with the following:

- International Bill of Human Rights
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- Children’s Rights and Business Principles (UNICEF)
- OHSAS Health and Safety Standard

We engage our suppliers through dialogue and contractual agreements, based on our contract templates, the AGC Group Code of Conduct, the AGC Supplier Code of Conduct, suppliers declarations and sustainable procurement procedures. We undertake the necessary procedures to assure that business partners, suppliers, contractors or subcontractors, or any other person that has a business relationship with AGC implements and follows the highest due diligence standards in the protection of Human Rights and the Environment, and take very seriously any breaches or violations of our internal rules, guidelines, and procedure taking the appropriate measures to prevent or mitigate the effects of those breaches, including the termination of the relationship.

For these reasons, all suppliers and business partners of AGC must be compliant with the following integrity standards:

i. **Human Rights:**

With the aim of contributing to the realization of a better Earth and society, and doing business in a way that is trusted by society as a whole, and expected to grow and develop in a sustainable way while protecting Human Rights and identifying salient Human Rights issues, AGC and its suppliers and business partners must act in accordance to the principles and due diligence procedures stated on the [AGC Group Human Rights Policy](#).



Your Dreams, Our Challenge

We expect from our upstream and downstream supply chains, as well as other business partners, to address any risk in an appropriate manner, as described on the [AGC Group's Sustainability Management](#); the same standards must be expected from their own suppliers and business partners.

ii. **Health and Safety:**

As stated on the "[AGC Group Occupational Health and Safety Policy](#)", "[AGC Group Industrial Safety & Security Policy](#)" and "[Health Management Policy](#)", our suppliers and business partners must undertake to respect the standards of international and national legislation related to the health and safety of their employees, stakeholders and third parties.

We are on an ongoing path towards creating products that comply with the highest standards of safety and quality. Based on the principle of "incorporating Customer Satisfaction perspective into our daily work", AGC and its suppliers and business partners work together to develop and provide products and services that continuously create the value that meets customer expectations.

For these reasons, AGC expects its suppliers and business partners to have appropriate management systems in place and/or ISO certifications that comply with EHSQ standards and occupational health and safety regulations. Suppliers and business partners agree to achieve the best results possible when audits are undergone on their businesses, and to comply with the highest levels of health and safety standards at their and AGC's premises.

iii. **Corporate Social Responsibility, Diversity, Equity, and Inclusion:**

AGC undertakes to promote and monitor diversity and inclusion at every level of its supply chain by carefully defining objective KPIs, elaborating a dedicated action plan, and ensuring that all our employees are managed with equity, whatever their ethnicity, nationality, religion, gender, or sexual orientation; as well as any other characteristic or situation protected by local law such as pregnancy, political or religious beliefs, national minority, etc.

We expect that our suppliers and business partners follow the same social responsibility standards by creating equal opportunities in a fair and non-discriminatory business environment. Furthermore, we expect our supply chain to comply with the ILO Convention No. 100 on Equal Remuneration and No.111 on Discrimination in Employment and Occupation.

iv. **Prohibition of Modern Slavery, Forced Labour, and Child Labour:**

- a) **Prohibition of Child Labour:** Suppliers and business partners will NOT employ any form of child labour in their operations and facilities. They must be fully compliant with ILO Conventions No. 138 on Minimum Age and No. 182 on Worst Forms of Child Labor, and must adhere to minimum employment ages, reject any form of child labour, and verify that all their employees, subcontractors, suppliers, and business partners meet the same legal requirements.
- b) **Prohibition of Forced Labour and Modern Slavery:** Supplier and business partners must categorically reject any form of labour without adequate and proportionate payment, any form of modern slavery, and human trafficking in accordance to ILO Conventions No. 29 on Forced Labor and No. 105 on the Abolition of Forced Labor. Any breach of these conventions is forbidden and goes against the principles and values of AGC. All new suppliers and business partners are approved using pre-defined qualification documents and procedures, and are regularly monitored to comply with all applicable laws.
- c) **Prohibition of using Force to Protect Corporate Assets or Business Objectives:** Suppliers and business partners must comply with legislation prohibiting torture, cruel or degrading actions, or wrongful and forced treatment and behaviour towards their employees or third parties, and must reject the use of public or private security forces for any of those purposes.



Your Dreams, Our Challenge

v. **Labour Rights:**

- a) **Right to Fair Remuneration:** All suppliers and business partners must provide to their employees a fair remuneration according to the specifications of the employment, the tasks allocated, and national legislation. Where applicable locally, suppliers and business partners must guarantee that the minimum remuneration standards and minimum wages of the respective business and economic sector are complied with, and must keep all legal documents proving the working conditions and hours worked (i.e. pay slips, employment contracts, risk analysis).

All suppliers and business partners must be able, at any time and at AGC's first request, in compliance with GDPR rules, to prove that all applicable legal, regulatory or contractual employment provisions are complied with, including -when applicable- the mandatory minimum wages ensuring the right to a fair remuneration.

- b) **Appropriate Working Hours:** Work-life balance is a top priority to keep employees healthy, happy, and efficient while creating value for the business, AGC's suppliers and business partners must assure that the same values and legal requirements are met with their own employees. Suppliers and business partners must follow the ILO Fundamental Principles and Rights at Work related to working hours and fair remuneration, and comply with national legislation and labour guidelines.
- c) **Freedom of Association and Collective Bargaining:** AGC recognizes the right of employees to form trade unions and work councils; as well as their right to collectively negotiate working conditions. As such, our suppliers and business partners must provide an open space for dialogue with their employees and promote constructive cooperation. No employee should be discriminated, put in a disadvantaged position, or favored for belonging to a representative body.

vi. **Conflict Minerals and Chemicals:**

Per Regulation (EU) 2017/821, AGC regularly requires its supply chain partners to confirm that materials purchased do not contain Conflict Minerals and requires to declare that the full supply chain process of their suppliers has also been reviewed to this purpose. Suppliers must not source from DRC or adjoining countries, declare that the referenced smelter is listed on the CFSI's smelter list, or that they do not supply from recycled or scrap sources. Based on CMRT and EMRT, suppliers must confirm that the minerals used in processing activities are not infringing the Conflict Minerals legislations and that full checks are in place to avoid any breaches.

Furthermore, with the objective of collaborating with AGC to achieve its environmental objectives, suppliers confirm that they comply with the applicable chemicals control legislation, especially with the REACH regulation.

vii. **Environment Protection and Sustainability:**

Based on the UN Sustainable Development Goals, AGC's suppliers and business partners commit to achieve a sustainable society by contributing towards decarbonization, a circular economy, and creating harmony with nature in all phases of the value chain. Suppliers and business partners must comply with all relevant internal and external environmental rules, works toward the prevention of pollution and relevant environmental issues, and contribute to the protection of the environment, as per the values and actions contained on the [AGC Group Environment Policy](#), as well as compliance, where applicable, with the Corporate Sustainability Due Diligence Directive (EU) 2024/1760 and the Deforestation and Forest Degradation Regulation (EU) 2023/1115.

AGC recommends the incorporation of an Environmental Management System (EMS) following the requirements of international standards (ISO 14001, EMAS, etc.)



Your Dreams, Our Challenge

viii. **Ethical Business Practice:**

AGC implements policies, guidelines, and procedures to comply with national and international legislation and creates an integral business environment across its entire supply chain and business activities:

- a) **Fair Competition and Antitrust:** Our suppliers and business partners must implement a zero tolerance policy for violations of Antitrust and Competition Law. We recommend the implementation of Antitrust and Competition Law guidelines and policies, and the periodical provision of trainings to employees that have contact with competitors and who may pose a higher risk of a breach.
- b) **International Trade Controls:** Suppliers and business partners must set up internal rules and procedures to comply with applicable export and trade control regulations in the EU, the USA, the UK, Japan, and other countries and regions where they conduct business activities with AGC. Furthermore, direct or indirect responsibilities may be deducted from the lack of control of international trade requirements. AGC expects clear and accurate custom documents, appropriate licenses, permits or approvals, and any other legal records necessary to conclude the transaction in compliance with trade control legislations.
- c) **Conflict of Interest, Anti-bribery and Anti-Corruption:** All suppliers and business partners must abide by the applicable anti-bribery and anti-corruption laws. We recommend the introduction of trainings related to the topic of conflicts of interest and anti-corruption, and implementing strong business ethic plans across their entire organization.
- d) **Protection of Assets, Confidential Information, and Personal Data:** AGC regards "Maintaining and Improving Information Security" as one of the important challenges in modern business activities, to guarantee and earn the trust of customers and third parties, and to fulfill societal responsibilities. We expect all of our suppliers and business partners to implement the highest standards of information asset protection and business information safeguarding.

We recommend the implementation of strict guidelines and procedure for the acquisition, control, processing and protection of personal data, and to align with EU and national legislation. All employees must be properly trained on Information Security and have appropriate regulations and procedures in place based on ISO 27000 to protect information and assets.

ix. **Implementation of Due Diligence Procedures:**

AGC is constantly implementing new procedures, quality checks, and reviewing the status of its due diligence systems and adapting them to any changes in the supply chain, the nature of the activities, the products and services provided, or in accordance to any findings on the reports of risks and violations to Human Rights or the environment. All suppliers and business partners are expected to assist AGC by complying with the AGC Supplier Code of Conduct, and are responsible to communicate to their own employees, and direct and indirect suppliers, the principles and requirements contained on it.

The agreement to comply with our values, principles, and due diligence requirements are a pre-requisite for all our suppliers and business partners before entering into any business relationship with AGC. All new and existing suppliers and business partners must fill-out the appropriate sustainable due diligence questionnaires, agree with our terms and conditions, and be screened through our screening and suppliers management system before providing any product or service to AGC. The same level of due diligence is required for subcontractors and sub-subcontractors.

AGC follows strict procurement processes to manage its list of suppliers and business partners, and determine their quality and the level of risk their activities suppose to the business. If the results of the supplier evaluations are found to be "poor", the company may consider ending the business relationship with the supplier or business partner.

x. **Remedial Measures:**

AGC reviews its risk categorization and assessments, and available information and reports in order to take preventive measures to reduce and avoid the adverse impacts of any violation to Human Rights or the environment, and expects the same level of commitment and adherence to the AGC Supplier Code of Conduct by its suppliers and business partners.

If AGC determines that any of its direct or indirect suppliers have violated Human Rights or environmental standards, or that such a violation is likely to happen, it may take remedial action without undue delay to minimize, prevent or end its adverse effects. This action includes searching for the cause of the violation, and determine if the origin comes from the behavior of its employees, suppliers, business partners, or subcontractors.

The specific remedial measure may vary by the level of risk posed by the activity performed in the supply chain, the size of the company, the characteristics of the transaction, the duration of the business relationship, any previously known risks or violations, etc.

Expedited action is required from all our direct and indirect suppliers and business partners who are contractually obliged to implement the same standard of actions to remediate any adverse impact that is likely to happen, suspected or ongoing. Depending on the extent of the adverse impact, we reserve the right to request to rectify the situation immediately, take legal action, temporarily suspend the business relationship, or terminate the business relationship.

xi. **Reporting Channel and Complaints Handling:**

AGC has reporting channels and a complaints handling procedure to acknowledge, investigate, mitigate, and remediate the effects of any risk or violation to Human Rights, the environment, or fair business practices. The system consists not only of a whistleblowing system, but also a highly organized Compliance Organization, both at European and national levels. The Compliance Organization includes the Persons of Contact (POC), the EU Compliance Office, and the EU Compliance Committee. Complaints can also be raised to the Ad Hoc Case Managers, as a top manager of the company, or to the Human Resources Organization through various methods of reporting, including the reporting channels.

The same reporting channels can be used to report any breach of the AGC Group Code of Conduct, the Supplier Code of Conduct, or our internal rules, guidelines, policies, and procedures. We take any breach of our internal rules or the Law very seriously and we will implement the necessary preventive or remedial measures to reduce or avoid any adverse impacts.

AGC recommends to its suppliers and business partners to implement a reporting channel in compliance with the current whistleblowing legislation, due diligence obligations, and to acknowledge and reduce the breaches of their internal rules, guidelines and policies.

xii. **Revisions:**

Revisions and updates will be incorporated to the AGC Supplier Code of Conduct whenever we detect a change in the legislation, modify our internal rules or guidelines, recognize an increase in the risk of adverse impacts to Human Rights or the environment, or is found necessary for ethical reasons.