



# Glamox Procurement Policy

## 1. Purpose and scope

The purpose of this policy is to outline the framework relevant to ensure that all procurement of products and services in Glamox are carried out in a sustainable and compliant manner in accordance with applicable laws, regulations, recognized standards and Glamox code of conduct.

Glamox aim to continuously improve and increase the competitive advantage of Glamox through cost optimized procurement activities, quality and logistic improvements and innovate development of products and services by obtaining favorable conditions for the purchase of products and services, building long-term commercial relationships with suppliers and assuring a sustainable supply chain.

The policy applies to all purchasing and logistic activities conducted within Glamox AS and its subsidiaries (referred to as Glamox). The policy also extends to suppliers, subcontractors, representatives and other contracting parties of Glamox AS and its subsidiaries. All parties to whom this policy applies are individually ultimately responsible for compliance with this policy.

Vice President Procurement SPL is the owner of the policy, and any deviations to this policy has to be approved by the policy owner. This policy is approved by the Senior Vice President SPL.

Glamox Procurement Policy principles centre on:

## 2. Policy Principles

- **Achieving best value for money**

The fundamental objective for Glamox is to ensure a transparent and sustainable supply of products and services at the right quality and quantity, at the right time and place in accordance with the best commercial terms and conditions. As part of Glamox commitment to undertake a strategic, effective and coordinated procurement process, products and services must always be purchased in accordance with business needs at the best value, with robust due diligence to minimize risk and financial exposure.

- **Transparency and accountability**

Glamox strives to meet the highest ethical and professional standards when conducting its business activities and Glamox' requirements to ethics, anti-corruption, health, safety, environment and quality as well as compliance with all applicable sanctions regulations shall be adhered to throughout the procurement processes. Relations with suppliers are conducted in an impartial, transparent, fair and ethical manner and in full compliance with all relevant laws and regulations.

- **Sustainability**

Glamox will cooperate with suppliers that confirm compliance with all applicable laws and regulations, act ethically and in a sustainable and socially responsible manner, including but not limited to respecting internationally recognized human rights, equal opportunity, health and safety regulations.

Glamox strives to reduce and minimize the environmental footprint and maximize the positive environmental effects of products by identifying and adhering to environmental best practice through environmentally responsible procurement. Glamox strives to work with suppliers who follow best practices in environmental management, including energy and resource efficiency, waste reduction and recycling, in the selection of products and services that minimize environmental impacts.

Purchases will be evaluated based on a variety of criteria, ranging from the necessity of the purchase to the options available at disposal in the end of the lifecycle. Environmental considerations must be integrated into all stages of the procurement process and balanced with the other procurement principles.

- **Responsible supply chain management**

Glamox and its suppliers are committed to responsible supply chain management as set in Glamox' Responsible business partner policy. This policy provides a framework for any organizational unit involved in procurement activities to minimize respective risks when selecting and dealing with suppliers and to assess products and services which carry potential environmental, labor and human rights impacts during lifecycle (production, usage, disposal). Glamox requires suppliers to operate in accordance with the principles set out in the Responsible business partner policy. In order to evaluate compliance to Glamox requirements suppliers are requested to provide detailed information through external Supplier Sustainability Monitoring Platform. Any known violations or inability to provide the appropriate evidence shall disqualify any supplier from the procurement process.

### 3. Procurement process

All purchases are subject to specific tender requirements depending on established thresholds. New suppliers shall as main rule be subject to a qualification process, including registration of the supplier in a supplier sustainability monitoring platform, to ensure that the supplier's meet Glamox' requirements.

Competitive bidding is the main principle and a minimum of 3 competitive quotes shall be obtained. Any exemption from this basic requirement must be justified and documented. More detailed requirements are defined in the procurement work instruction.

Glamox requirements to ethics, anti-corruption and sustainability shall be adhered to throughout the procurement and delivery process. All suppliers shall confirm that they do not violate any anti-corruption, export control and sanctions laws or regulations or human rights in connection with their work for Glamox.

All personnel involved in the procurement process shall avoid conflict of interests and if a situation where he/she has a direct or indirect interest in the selection of a specific supplier or transaction he/she shall immediately notify his or her immediate superior. The superior will evaluate the potential conflict of interest, and the relevant personnel shall not take part in the procurement process, final evaluation or selection of the supplier or appropriate mitigating measures be put in place.

Intra-company procurement shall always be in line with relevant market prices and conditions and contracts shall be entered into in accordance with the arm-length principle.

Regardless of the exact expenditure, all purchasing shall include an appropriate and proportionate risk management analysis.

The following principles should be adhered to in the selection of qualified tenderers and the award of contracts shall be based on the following objective and non-discriminatory criteria:

- **Fair competition**

All bidders shall be treated with fairness and given the same level of information when preparing quotations and tenders.

- **Cost Effectiveness**

Quotations and tenders shall be evaluated on competitive pricing, quality of the products/services and track record of the bidders.

- **Transparency**

Tender documents should provide all the necessary information for facilitation of submission of appropriate and competitive tenders.

- **Ethical business conduct**

Bidder must conduct their business in an ethical manner and in compliance with all relevant laws and regulations.

All contract shall be concluded on a Glamox standard contract template attaching Glamox Standard Terms and Conditions for Purchase of products and services.

The tendering and contracting process shall be documented in writing and shall clearly show the basis for the supplier selection, including documentation and approval if the competitive tendering principle is exempted or a single source supplier utilized.

#### 4. Confidentiality

Glamox will protect intellectual property and other confidential information provided by suppliers. All information provided by Glamox, which is not in the public domain, is deemed confidential and should only be used for its intended purpose.

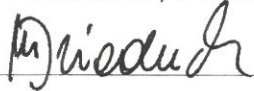
#### 5. Policy review and revision summary

The policy will be reviewed regularly to ensure its relevance and alignment with applicable legal and governance requirements.

Rev 01: 1st Glamox revision – May 2022

Owner:

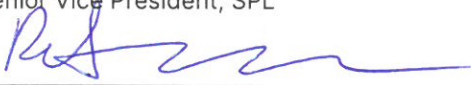
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Approved:

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Senior Vice President, SPL



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