



Rockwood Service Corporation

Supplier Code of Conduct

Applies to all Rockwood wholly owned subsidiaries and affiliates, including all Acuren entities ("Rockwood" or the "Corporation").

INTRODUCTION

Integrity is at the heart of everything we do. It is one of our core values. Integrity defines how we treat each other, the work we do for our clients, and our unyielding commitment to complying with every law and regulation that applies to us. Rockwood expects its suppliers to act with integrity and treat people and the environment with respect. Reaching our goals in an ethical manner underscores our success as individuals and as an organization.

The **Rockwood Supplier Code of Conduct** ("Supplier Code of Conduct") formalizes the Corporation's longstanding commitment to always acting with integrity and doing the right thing – every one of us, every day, everywhere and outlines the expectations and requirements for ethical behavior of all Rockwood's suppliers

All suppliers of Rockwood certify they comply with the principles and requirements within the Supplier Code of Conduct. In the event any supplier is found to have violated any policy or standard contained in the Supplier Code of Conduct, Rockwood reserves the right to discontinue the business relationship with the supplier.

GENERAL STANDARDS OF ETHICAL BUSINESS CONDUCT

Suppliers are expected to conduct their business with integrity and in accordance with the highest ethical standards. Rockwood has set out the following principles for which we expect all suppliers to comply:

- Promote integrity in all business dealings;
- Avoid conflicts of interest or potential conflicts of interest, ensuring business decisions are not made based on the potential for personal gain;
- Ensure business records are accurate and transparent; and
- Do not participate in any acts of bribery or corruption.





COMPLIANCE WITH GENERAL LAWS

Suppliers must comply with all applicable laws, regulations and ordinances including, without limitation, applicable anti-bribery, anti-corruption, human rights, labor rights and fair working conditions, and forced labor and child labor laws.

HEALTH, SAFETY AND TREATMENT OF WORKERS

Health and Safety

Suppliers must be committed to the health and safety of all workers and must fully comply with all applicable health and safety laws and regulations. Suppliers are expected to protect workers from harm and avoid any incidents of workplace injury, illness or death. Suppliers are expected to provide employees with appropriate personal protective equipment and training, as well as maintain safe operating conditions at all facilities/locations. Additionally, suppliers are expected to have in place documented policies that prohibit violence, harassment and threats of violence in the workplace.

Child Labor and Forced Labor

We are committed to upholding the principles outlined in the International Labour Organization (ILO) conventions, particularly ILO Convention No. 182 on the Worst Forms of Child Labor and ILO Convention No. 29 on Forced Labor. The Rockwood Code of Conduct unequivocally prohibits child labor, ensuring that the minimum working age aligns with local laws and international standards, and we actively work to eliminate the worst forms of child labor. Additionally, we adamantly oppose any form of forced labor within our organization [and supply chain], in compliance with ILO standards, and are dedicated to maintaining a workforce that is free from coercion, threat, or any form of exploitation.

Suppliers are expected to comply with all relevant laws and regulations pertaining to child labor and forced labor.

Employment and the Workplace

Suppliers are expected to provide a positive work environment that is safe, compliant, professional. Suppliers must respect the human rights of their workers and treat all individuals with dignity and respect. Suppliers are to ensure no person or group of people are subject to discrimination in hiring or employment practices.

Wages, Benefits and Working Hours

Suppliers must comply with all applicable wage and hour laws and regulations, including those pertaining to minimum wages, maximum working hours and overtime hours, and rest and lunch breaks, as well as provide any legally mandated benefits.

Freedom of Association

Suppliers are expected to respect the rights of workers to form, join or refrain from joining trade unions of their choosing and to bargain collectively.



SUSTAINABILITY

Rockwood is committed to operating our business sustainably. We are committed to working with our employees, customers, regulators, suppliers, and investors to secure a sustainable future and improve the social, economic, and environmental well-being of the communities in which we operate, thereby creating a competitive advantage for the betterment of all.

Suppliers should respect the environment in compliance with all applicable environmental laws and regulations and conduct their operations in an environmentally responsible manner.

ANTI-BRIBERY/ANTI-CORRUPTION

All dealings of Rockwood must be conducted with the highest standard of integrity and in compliance with all relevant laws and regulations. The Rockwood Anti-Bribery Policy provides guidance and procedures to ensure that all employees, officers, and directors of the Company comply with all applicable anti-corruption and anti-bribery laws and regulations.

Rockwood has a zero-tolerance policy for corrupt activities of any kind, whether committed by Company employees or third parties acting on behalf of the Company, such as suppliers, agents, representatives, and consultants. The requirements of the Rockwood Anti-Bribery Policy apply to all such third parties. Please contact ethics@rockwoodservice.com if you have any questions or to receive a full copy of the Anti-Bribery Policy.

CONFIDENTIALITY, DATA PROTECTION AND PRIVACY

Suppliers shall not misuse or misappropriate any intellectual property or confidential information, or any personally identifiable information exposed to or shared by Rockwood. Suppliers must take appropriate action to safeguard such information and protect against unauthorized disclosure or misuse.

Suppliers are expected to be in compliance with all applicable data privacy and security laws and regulations and/or have taken reasonable action to prepare them to be in compliance with any such laws and regulations.

REPORTING SUSPECTED VIOLATIONS; RETALIATION STRICTLY PROHIBITED

If you wish to report a violation of the Supplier Code of Conduct, reports can be submitted **anonymously** at the Rockwood/Acuren Ethics Hotline.

The Rockwood/Acuren Ethics Hotline

<http://acuren.ethicspoint.com/>

By Phone: at 1- 833-706-0061 (USA and Canada) or 0800-048-8581 (UK)

Upon receiving a complaint or report, the Corporation will promptly (and to the extent practicable, confidentially) investigate and take appropriate action. Under no circumstances will any individual be subject to any retaliatory action for making a good faith report of suspected improper conduct and/or for cooperating in a corporate investigation.



Questions

If you have any questions regarding the Rockwood Supplier Code of Conduct, please contact ethics@rockwoodservice.com.

AMENDMENT

The Corporation may update the Supplier Code of Conduct from time to time. Any such updates will be communicated promptly.

SUPPLIER CODE OF CONDUCT QUESTIONNAIRE (APPENDIX A)

Suppliers must complete the Supplier Code of Conduct Questionnaire (APPENDIX A) and submit to the appropriate Rockwood/Acuren Buyer within thirty (30) days of receipt. The supplier organization is required to provide any updates to their survey responses after submitting.



APPENDIX A

Supplier Code of Conduct Document / Questionnaire: Policy on Forced or Compulsory Labor (as defined by ICO Convention No. 29), including Bonded Slavery and Human Trafficking Practices

At Rockwood (including all subsidiaries and affiliates), we strive to exceed our customers' expectations while maintaining the highest industry standards, providing safe working environments, respecting the dignity of every employee, and minimizing our impact on the environment.

Rockwood's Supplier Code of Conduct outlines what Rockwood requires from you as a supplier with respect to labor and employment rights, environmental health and safety, business ethics and social responsibility, and global trade practices. As a supplier, you must adhere to this Code of Conduct and operate in full compliance with the laws and regulations of all countries within which you operate.

As a Rockwood supplier, your company shall not engage in, or support forced or compulsory labor as defined by ICO Convention No. 29 including bonded slavery and human trafficking practices. All work performed must be voluntary, and employees have the right to terminate employment with reasonable notice.

Rockwood continues to actively engage its suppliers to address the issue of human trafficking and to collaborate on finding solutions. The goal of this survey is to create a more transparent, sustainable, and responsible supply chain that is free of labor abuses. This survey must be completed and submitted to your Rockwood Buyer within thirty (30) days after you receive it. Your organization is required to provide Rockwood with any updates to your responses after submitting the questionnaire. Please contact your Rockwood/Acuren Buyer if you have any questions.

Part 1 – Company Information

Today's date:	<input type="text"/>		
Company Name:	<input type="text"/>		
Headquarters Address:	Street No:	Ste No:	
	Street Name:	City:	
	State/Province:	Zip/Pin:	
	Country:		
Full Name and Particulars (of person completing the questionnaire)	First Name:	Last Name:	
	Title:		
	Email:		
	Phone No and Extension:		



Part 2 – Forced Labor Questions

The following questions are crucial to conducting an accurate analysis of forced labor risk in supply chains. Please answer the questions as completely as possible. Only include policies, processes and programs that are currently effective when answering the initial Yes/No question in this section. If you have something new that is planned or if a response requires further explanation, please include it in the free text section after responding 'Yes' or 'No'.

1. Do you currently have a forced labor compliance program for your operations and supply chain?

☐ Yes

☐ No

Please describe your organization's existing program or plans to create a program, including timeline and implementation details. In addition, please provide any additional processes, techniques, certification and training that ensures there is not forced labor in your organization's supply chain.

2. Do all tiers of your suppliers currently have a forced labor compliance program for their operations and supply chain?

☐ Yes

☐ No

Please provide any further explanation on your organization's suppliers forced labor compliance programs.



3. Does your organization have a policy that prohibits all forms of forced labor, bonded labor and human trafficking in its operations and in those of its suppliers?

☐ Yes

☐ No

Please provide any further explanation on your organization's policy or plans to develop a policy.

4. Does your organization conduct due diligence for forced labor risks for your suppliers?

☐ Yes

☐ No

Please provide a further explanation on your organization's due diligence activities.

5. Does your organization require all tiers of your suppliers to conduct due diligence for forced labor risks on their suppliers?

☐ Yes

☐ No

Please provide any further explanation of your organization's suppliers due diligence activities across all tiers.



6. How much visibility does your organization have over your supply chain? Please select one of the below and explain why you selected this option:

- ☐ **High:** You have mapped the full supply chain for key products and services used by your organization and have identified key suppliers at all levels of your supply chain.
- ☐ **Moderate:** You have mapped the full supply chain for key products and services used by your organization and have identified key suppliers at all levels of your supply chain.
- ☐ **Developing:** You have mapped the full supply chain for key products and services used by your organization and have identified key suppliers at all levels of your supply chain.

Please provide any further explanation on your organization's selection to the response in question #6.