

BERGER PAINTS JAMAICA LIMITED
SUPPLIER CODE OF CONDUCT

1. Introduction

Berger Paints Jamaica Limited, a member of the ANSA McAL Group, is committed to ethical business practices, sustainability, and compliance with legal and regulatory requirements. This Supplier Code of Conduct sets forth the expectations for all suppliers, contractors, and service providers conducting business with Berger Paints Jamaica Limited.

2. Compliance with Laws and Regulations

Suppliers must comply with all applicable local and international laws, regulations, and industry standards, including but not limited to:

- The Jamaica Public Procurement policy
- Employment and labour laws
- Health, safety, and environmental regulations
- Anti-corruption and anti-bribery laws
- Fair competition and trade compliance

3. Ethical Business Practices

Suppliers are expected to conduct business with integrity and transparency, including:

- Anti-Bribery & Corruption: No offering, accepting, or soliciting of bribes, kickbacks, or unlawful incentives.
- Conflicts of Interest: Avoid any situation that may create or appear to create a conflict of interest with Berger Paints Jamaica Limited.
- Fair Competition: Conduct business in a fair and lawful manner, without engaging in price-fixing, bid-rigging, or other anti-competitive practices.



4. Labour and Human Rights

Suppliers must uphold human rights and fair labour practices, including:

- **No Child Labour:** Suppliers must not employ underage workers, in accordance with applicable laws.
- **No Forced Labour:** Employment must be voluntary, and workers must not be subjected to forced or bonded labour.
- **Fair Wages & Working Hours:** Wages and working hours must comply with legal requirements.
- **Non-Discrimination & Harassment-Free Workplace:** Suppliers must ensure a workplace free from discrimination, harassment, and abuse.

5. Health, Safety, and Environment (HSE)

Suppliers are required to adhere to all applicable HSE laws and regulations and must comply with **Berger Paints' HSE Policy attached**. Suppliers must ensure that their employees and subcontractors operate in a manner that prioritizes safety, environmental sustainability, and regulatory compliance to protect employees, communities, and the environment, including, but not limited to:

- Providing a safe and healthy work environment.
- Implementing responsible waste disposal and pollution prevention measures.
- Minimizing environmental impact through sustainable practices.

6. Quality and Continuous Improvement

Suppliers must ensure the quality of products and services meets Berger Paints Jamaica Limited's standards and strive for continuous improvement through innovation, efficiency, and best practices.

7. Vendor Registration and Purchase Order Requirements

To ensure efficiency, compliance, and proper financial control, all vendors providing goods or services to Berger Paints Jamaica Limited must meet the following requirements:

- **Vendor registration**- all suppliers must be officially registered with Berger Paints **before** providing any goods or services.
- **Purchase Orders (POs)**- work or supply of goods must be carried out **only** based on an official, confirmed Purchase Order (PO).
- **Exceptions**- if a PO is not provided, written approval **must** be obtained from either the **General Manager (GM)** or the **Chief Financial Officer (CFO)** prior to the commencement of any work or delivery of goods.

8. Data Privacy and Confidentiality

Suppliers must protect confidential information, including trade secrets, business plans, and customer data, and comply with relevant data protection laws.

9. Reporting Violations and Accountability

Suppliers are expected to report any known or suspected violations of this Code to Berger Paints Jamaica Limited. Non-compliance may result in corrective action, termination of the business relationship, or legal consequences, depending on the severity of the violation.

10. Acknowledgment and Acceptance

By engaging in business with Berger Paints Jamaica Limited, suppliers acknowledge and agree to comply with this Supplier Code of Conduct.

For any questions or concerns regarding this Code, please contact 1 876 923-6262.

Together, we are
Family

