

RESPONSIBLE SUPPLY CHAINS – SOCIAL, ENVIRONMENTAL, AND ETHICAL RESPONSIBILITY

Policies and Procedures

Version 2 (EN)

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1. INTRODUCTION

JSC Tronhill is engaged in the design, and production of office chairs. Responsible business conduct and sustainable development are integral to Tronhill's operations and long-term strategy.

This document describes Tronhill's policies and procedures for responsible supply chain management and applies to the company's own operations as well as to suppliers and subcontractors involved in the production of labelled products.

This policy is approved by Tronhill executive management and is subject to periodic review and update.

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2. POLICY OBLIGATION

JSC Tronhill has adopted a documented policy for responsible supply chains covering human rights, labour law, environmental protection, and anti-corruption, applicable to the company's own operations and the entire supply chain.

The policy is based on and aligned with:

- The UN Global Compact
- The UN Guiding Principles on Business and Human Rights
- The OECD Due Diligence Guidance for Responsible Business Conduct
- Möbelfakta's requirements for Responsible Supply Chains (Chapter 3, ver. 17.2, effective 2026-01-01)
- EU Corporate Social Due Diligence Directive requirements

The policy establishes Tronhill's commitment to comply with the requirements set out in the above-mentioned documents and to take reasonable measures to identify, prevent, mitigate, and address risks of non-compliance within its own operations and throughout the supply chain.

This policy applies to:

- All employees within Tronhill, regardless of role or location
- All first-tier suppliers and subcontractors with whom the company has a contractual relationship

The requirements herein extend to both the company's own operations and all tiers of the supply chain. Suppliers are expected to cascade equivalent requirements to their own subcontractors.

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3. HUMAN RIGHTS

Tronhill supports and respects internationally recognized human rights and is committed to conducting its business in a manner consistent with internationally accepted standards, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights.

The company is committed to upholding the dignity, freedom, and equality of all individuals affected by its operations. Tronhill does not tolerate any form of human rights abuse, including but not limited to forced labour, child labour, discrimination, harassment, human trafficking, or unsafe working conditions.

Tronhill ensures that it neither causes nor contributes to, nor benefits from, human rights violations, whether directly or indirectly, within its own operations or throughout the supply chain. The company applies a risk-based approach to identify, assess, prevent, mitigate, and address potential and actual human rights impacts.

Tronhill expects its employees, business partners, suppliers, and subcontractors to uphold the same principles and standards. Where adverse human rights impacts are identified, the company is committed to taking appropriate corrective actions and supporting remediation efforts.

Human rights considerations are integrated into business decision-making processes, and the company promotes transparency, accountability, and continuous improvement in its human rights practices.

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4. LABOUR LAW AND WORKING CONDITIONS

Tronhill complies with applicable Lithuanian and EU labour and employment legislation and is committed to internationally recognised human rights and labour standards, including relevant UN and ILO conventions. Where international standards provide stronger protection than national legislation, Tronhill takes reasonable measures to apply the higher level of protection.

The Company expects its suppliers and subcontractors involved in the production of labelled products to comply with applicable labour legislation and to respect internationally recognised human rights and labour standards.

4.1 Wages and Working Hours

Tronhill ensures that wages, working hours, overtime, rest periods and other employment conditions comply with applicable Lithuanian labour legislation.

Employees shall receive at least the legally required minimum wage, paid regularly and in full. Working hours shall be reasonable and comply with applicable legislation. Overtime shall be voluntary, limited and compensated in accordance with applicable legal requirements.

The Company expects its suppliers and subcontractors to comply with applicable requirements concerning wages, working hours, overtime and rest periods and to provide fair working conditions.

4.2 Occupational Health and Safety

Tronhill provides a safe and healthy working environment and proactively identifies and manages occupational health and safety risks in accordance with applicable legislation.

The Company ensures safe equipment and working conditions, appropriate handling and storage of hazardous substances, and adequate emergency preparedness. Employees receive documented health and safety training on a regular basis, as well as when starting work or when changes in tasks or working conditions require additional instruction.

Work-related incidents are reported and followed up with appropriate corrective actions. Employees are encouraged to report unsafe conditions, incidents and other health and safety concerns without fear of retaliation.

The Company expects its suppliers and subcontractors to provide safe and healthy working conditions and to comply with applicable occupational health and safety legislation.

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4.3 Freedom of Association and Collective Bargaining

Tronhill respects the right of employees to freedom of association and collective bargaining in accordance with applicable legislation and the principles of ILO Conventions No. 87 and No. 98.

Employees are free to join or form trade unions and to participate in collective bargaining. No employee shall be discriminated against or subjected to retaliation for lawfully exercising these rights. The Company expects its suppliers and subcontractors to respect the same principles.

4.4 Prohibition of Child Labour

Tronhill does not employ persons under the age of 18. The Company complies with applicable Lithuanian legislation concerning minimum working age and prohibits child labour in accordance with the principles of ILO Conventions No. 138 and No. 182.

Tronhill requires its suppliers and subcontractors to comply with applicable minimum working age requirements and prohibits the use of child labour in its supply chain.

4.5 Prohibition of Forced Labour

All employment at Tronhill is freely chosen. Forced, bonded, trafficked or compulsory labour is prohibited in accordance with applicable legislation and the principles of ILO Conventions No. 29 and No. 105. Employees are free to terminate their employment in accordance with applicable contractual and legal notice requirements. Tronhill does not require employees to lodge deposits or surrender identity documents as a condition of employment.

The Company expects its suppliers and subcontractors to respect the same principles and does not accept forced or compulsory labour within its supply chain.

4.6 Prohibition of Discrimination and Harassment

Tronhill provides equal opportunities and does not tolerate discrimination, harassment or other inappropriate treatment in the workplace.

Employment-related decisions shall be based on relevant qualifications, competence, performance and legitimate business requirements. Discrimination based on gender, age, race, nationality, ethnic origin, religion or belief, disability, sexual orientation, trade union membership or any other characteristic protected by applicable legislation is prohibited.

All employees are entitled to a workplace free from harassment and discrimination. Employees may raise concerns with responsible management, and such concerns shall be handled appropriately and without retaliation.

The Company expects its suppliers and subcontractors to respect the principles of equal treatment, non-discrimination and protection from harassment.

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5. ENVIRONMENTAL RESPONSIBILITY

Tronhill actively and continuously works to reduce the negative environmental impacts of its operations, products, and supply chain. The Company is committed to conducting its activities, including material sourcing, manufacturing, and distribution, in compliance with applicable national, EU and international environmental legislation, regulations and other relevant environmental requirements in the countries where it operates.

The Company takes reasonable measures to identify, prevent and mitigate environmental risks within its own operations and supply chain. These include, but are not limited to, emissions to air, water and soil, waste generation and management, use of chemicals, consumption of energy, water and other resources, pollution, and impacts associated with raw material sourcing.

Tronhill maintains procedures to identify applicable environmental legal requirements, monitor changes in legislation and evaluate ongoing compliance. Environmental requirements are also considered, where relevant, as part of supplier selection, evaluation and management.

Tronhill works to reduce its climate impact in line with the objectives of the Paris Agreement and promotes efficient use of energy and resources. The Company aims to reduce the use of virgin raw materials where feasible through material efficiency, reuse, recycling and other circular solutions.

The Company works to identify and, where technically feasible, substitute or reduce the use of chemicals that may be hazardous to human health or the environment.

Tronhill ensures that waste is properly sorted, recorded and transferred to authorized waste management companies in accordance with applicable legislation. Waste generation and management are accounted for and reported through the GPAIS system where applicable. The Company maintains the necessary agreements and documentation related to waste collection and management. Prevention, reuse and recycling are prioritized where practicable.

Tronhill is committed to responsible sourcing of biological raw materials. Wood and other materials of biological origin shall be sourced in accordance with applicable legislation and relevant requirements concerning protected and threatened species, including CITES requirements. Materials from illegally harvested or unlawfully traded sources are not accepted.

The Company respects environmental and land-related rights of local communities and indigenous peoples. Tronhill does not accept illegal land acquisition, unlawful displacement or violations of rights to land and natural resources in connection with its operations or supply chain and expects its suppliers to follow the same principles.

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6. BUSINESS ETHICS

Tronhill maintains a zero-tolerance approach to corruption in all forms, including bribery, extortion and fraud, in accordance with applicable legislation and the principles of the UN Convention against Corruption. Business decisions shall be based on objective criteria, and conflicts of interest that may improperly influence such decisions shall be avoided.

The Company requires ethical and transparent business conduct from its employees and business partners, in accordance with applicable anti-corruption legislation and Principle 10 of the UN Global Compact. Tronhill does not directly or indirectly offer, request, accept or tolerate bribes or other corrupt practices in its operations or supply chain.

Tronhill competes fairly and does not engage in anti-competitive practices, including price-fixing, market sharing or improper exchange of competitively sensitive information.

The Company manages tax matters responsibly, complies with applicable tax legislation, and does not engage in artificial or questionable tax-planning arrangements.

Employees and business partners are encouraged to report suspected unethical conduct, corruption, conflicts of interest or other violations through the Company's reporting channel. Concerns may be raised without fear of retaliation.

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7. COMMUNICATING THE POLICY OBLIGATION

Tronhill communicates its responsible supply chain requirements internally to relevant employees and externally to suppliers, business partners, and subcontractors with whom the company has contractual relationships. Compliance with this policy is a condition for doing business with Tronhill. Suppliers are responsible for implementing the requirements within their own operations and for ensuring that equivalent requirements are applied to their subcontractors and communicated to relevant employees.

These requirements are made available to relevant business partners and are acknowledged and accepted in writing through a signed Code of Conduct. Where relevant, Tronhill may support suppliers through dialogue or training to promote understanding and implementation throughout the supply chain.

Communication activities include:

- Publishing this policy on the company website
- Providing onboarding training to all new employees and regular refreshers to existing staff
- Requiring first-tier suppliers to sign the Code of Conduct and acknowledge requirements in writing

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