

THIRD PARTY WORKING POLICY ESSA SALES & DISTRIBUTION S.A.

Effective Date: 30.01.2019

Approved by: ESSA GROUP BOARD OF DIRECTORS

Version: 1.0

1. Purpose

The purpose of this policy is to ensure that all third parties engaged by **ESSA SALES & DISTRIBUTION S.A.** (“ESSA”) operate in a manner consistent with ESSA’s values, ethical standards, legal obligations, and business integrity principles. This policy establishes the minimum requirements for managing relationships with suppliers, contractors, distributors, consultants, and other third-party partners.

2. Scope

This policy applies to:

- All ESSA employees involved in selecting, managing, or working with third parties;
- All third parties acting on behalf of ESSA, including but not limited to suppliers, distributors, service providers, consultants, and agents.

3. Principles

ESSA is committed to conducting business ethically, responsibly, and in full compliance with applicable laws and regulations. All third parties must:

- Conduct business honestly and transparently;
- Comply with all applicable laws, including those relating to anti-corruption, competition, data protection, labor, environment, and human rights;
- Avoid conflicts of interest and disclose any potential conflicts immediately;
- Ensure fair treatment, safe working conditions, and respect for human rights across their operations;
- Protect confidential and proprietary information belonging to ESSA.

4. Third-Party Due Diligence

Before engaging with a third party, ESSA will perform an appropriate due diligence assessment that may include:

- Legal and financial background checks;
- Review of ownership and control structures;
- Evaluation of ethical, compliance, and sustainability practices;
- Confirmation that the third party is not involved in illegal or unethical activities.

No third party may be engaged until the due diligence process has been completed and approved.

5. Contractual Requirements

All third-party engagements must be governed by a written contract that:

- Clearly defines the scope of services or deliverables;
 - Includes clauses on compliance with applicable laws and ESSA's Code of Conduct;
 - Specifies confidentiality, data protection, and anti-bribery obligations;
 - Allows ESSA to audit or monitor the third party's compliance with this policy.
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6. Compliance and Monitoring

ESSA reserves the right to monitor third-party performance and compliance through:

- Regular reviews, audits, or site visits;
- Requests for documentation or certifications;
- Corrective action plans in case of non-compliance.

Failure to comply with this policy or related contractual terms may result in corrective actions, suspension, or termination of the business relationship.

7. Anti-Bribery and Corruption

Third parties must not, directly or indirectly, offer, promise, give, or accept any form of bribe, kickback, or improper payment to or from any individual or organization.

All interactions must comply with applicable anti-corruption laws and ESSA's **Anti-Bribery and Corruption Policy**.

8. Confidentiality and Data Protection

Third parties must safeguard all confidential, personal, and business information obtained during their engagement with ESSA and must comply with applicable data protection laws, including GDPR where relevant.

9. Health, Safety, and Environment (HSE)

ESSA expects third parties to provide safe and healthy working conditions and to minimize environmental impact by adopting responsible operational practices consistent with ESSA's **Health, Safety, and Environmental Policy**.

10. Reporting Concerns

ESSA encourages employees and third parties to report any suspected violations of this policy, unethical behavior, or illegal activity through ESSA's **Ethics & Compliance Reporting Channel**. Reports can be made confidentially and without fear of retaliation.

11. Roles and Responsibilities

- **Management:** Ensure this policy is implemented and enforced.
 - **Employees:** Follow procedures when engaging or managing third parties.
 - **Third Parties:** Comply fully with this policy and cooperate with ESSA's compliance processes.
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12. Policy Review

This policy will be reviewed annually or whenever necessary to reflect changes in laws, regulations, or ESSA's business operations.

Approved by: EUGEN SAULEA

Title: GENEAL MANAGER

Date: 30.01.2019

Acknowledgment

By signing below, the third party confirms that they have read, understood, and agree to comply with the **Third Party Working Policy** of ESSA SALES & DISTRIBUTION S.A.

Third Party Name: _____

Authorized Representative: _____

Signature: _____

Date: _____
