

Supplier Code of Conduct of the WITTENSTEIN Group

1. Basis of Collaboration

- This Supplier Code of Conduct is drawn from the WITTENSTEIN Group (WITTENSTEIN) Code of Conduct and is based on the principles of the United Nations (UN) Global Compact and the conventions of the International Labour Organisation (ILO).
- Sustainable and socially responsible conduct in business is the basis for all our transactions and provides a universal foundation for good, long-term business relations.
- This Supplier Code of Conduct defines the high standards that WITTENSTEIN sets itself and which it also expects from its suppliers.
- This Supplier Code of Conduct applies world wide with respect to all suppliers of the WITTENSTEIN Group and its affiliated companies.
- Our suppliers undertake to uphold at least comparable standards and to ensure that their governing bodies, employees, suppliers, intermediaries, subcontractors and other business partners are also committed to at least comparable standards.
- WITTENSTEIN's suppliers are responsible for developing their own codes of conduct in order to ensure that the principles set out herein are passed on and promoted in their own supply chains in the best way possible.

2. Lawful Conduct

We expect our suppliers to put lawful conduct before profit and to make sure that this is the case along the whole supply chain.

- Suppliers must comply with all applicable national and international laws and other regulations.
- Violations of the law will not be tolerated.

3. Ethical Business Practices and Integrity

We expect our suppliers to act fairly and with integrity world wide.

- In the interests of free and fair competition, business practices must be legitimate and accredited at all times, with particular consideration given to the relevant law on competition and cartels.
- The principles of a free market and open competition must be upheld and enforced.
- It is prohibited to intend, cause or otherwise engage in the unlawful obstruction of competition or concerted practices.
- Corruption will not be tolerated in any form, whether it involves offering or accepting bribes, granting or accepting inducements or any other form of undue influence.

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- With regard to business associates, it is prohibited to offer or accept, directly or indirectly, gifts, invitations and such like that are related directly to the procurement, award, delivery, processing and payment of orders.
- Offering or accepting gifts and invitations, under other circumstances, is only permitted where they have been designed in such a way that in terms of their value, financial scope or in other respects, they are unlikely to influence the actions or decisions of the recipient unduly or to place the recipient in a position of obligatory dependence. In this regard, it is as important to consider whether gratuities coincide with project decisions, as it is to consider their frequency and proportionality.
- Gifts or invitations to officials are forbidden.
- Private and business interests must be kept strictly separate. All actions must take place free of any extraneous considerations and personal interests. Conflicts of interest must be avoided.

4. Respect for Human Rights

We expect our suppliers to respect human rights and to ensure that they are not complicit in human rights abuses.

- The fundamental rights of all human beings, particularly the dignity and privacy of every individual, must be safeguarded and respected.
- Employees must be protected against corporal punishment and against physical, sexual, psychological and verbal harassment and abuse.
- All employees have the right to freedom of opinion, freedom of association and freedom of assembly as well as to enter into collective bargaining in accordance with the relevant national provisions.
- Discrimination, harassment, denigration or prejudice based on race, origin, gender, disability, skin colour, sexual orientation, political or religious convictions, age or world view will not be tolerated.
- Objectively unjustified and unlawful unequal treatment is prohibited. The principle of equal opportunities must be upheld. All collaboration must be characterised by mutual respect, appreciation and responsible interaction.
- Child labour will not be tolerated. The ban on child labour and protection of young workers must not be circumvented.
- All forms of forced labour, involuntary prison labour, slavery or human trafficking are prohibited.
- All employees shall be given the freedom to terminate their employment subject to compliance with a reasonable notice period.

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5. Reasonable Working Conditions

We expect our suppliers to adopt a responsible working policy and actively promote health and safety.

- Suppliers must provide a safe and non-hazardous working environment in order to avoid accidents and damage to health.
- Health and safety at work forms part of all operational processes and must be incorporated into the consideration of technical, economic and social issues.
- A hygienic work place, access to drinking water, adequate sanitation facilities, regular safety training and emergency preparedness must be standard for all employees.
- Remuneration and social benefits must at least correspond to the relevant national and local statutory requirements and/or the level in national economic sectors, industries and regions. All employees shall be remunerated sufficiently to cover their basic needs.
- Suppliers must ensure that working hours do not exceed the statutory maximum limits applicable in each case. Employees must also be permitted to have adequate breaks and rest periods, and to take holiday, in accordance with the statutory requirements.

6. Environmental Protection and Sustainability

We expect our suppliers to strive to minimise the detrimental environmental impact of their operations, products and services.

- When dealing with hazardous substances, suppliers must ensure safe handling, movement, storage, re-use and disposal.
- The statutory minimum requirements on environmental protection must be observed. Any environmental impact must be kept to a minimum. Measures to reduce the use of resources and improve resource efficiency shall be implemented. Suppliers must conserve resources.
- Suppliers shall consistently pursue the development and distribution of environmentally friendly and sustainable technologies, products and working environments.

7. Confidentiality and Data Protection

We expect our suppliers to handle confidential information with care and show sensitivity in dealing with data.

- Trade and business secrets must be handled discretely and confidentially and must not be shared with or made accessible to unauthorised third parties.
- The protection of the intellectual property of third parties must be respected.

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- All documents and papers must be stored properly or as agreed and not altered or destroyed in a dishonest manner.
- The protection of privacy when using personal data as well as the security of all business data shall be guaranteed.

8. Compliance with the Rules of Trade Control

We expect our suppliers to ensure compliance, in a global context, with any applicable export, customs and tax laws.

- The applicable rules on the import, export and transfer of goods, technologies and services and regarding the movement of capital and payments must be observed nationally and internationally.
- Trade bans (embargoes) and restrictions must be observed or reported.
- The appropriate approvals must be obtained for goods which may be used for both military and civilian purposes (dual use).
- Suppliers must comply with the latest applicable provisions on money laundering and the funding of terrorism.

9. Compliance with the Supplier Code of Conduct

- Our suppliers shall monitor compliance with the principles contained in this Supplier Code of Conduct. On request, they shall submit a self-declaration to WITTENSTEIN and provide all the documentation necessary to prove compliance with the standards of this Supplier Code of Conduct. They shall notify WITTENSTEIN of any occurrences that are contrary to this Supplier Code of Conduct.
- Our suppliers must ensure and check compliance with the principles of this Supplier Code of Conduct in their own supply chain.
- WITTENSTEIN reserves the right to monitor compliance with the standards of this Supplier Code of Conduct. For this purpose, WITTENSTEIN may, in particular, carry out audits and random checks on suppliers.
- Where a supplier fails to comply with the standards of this Supplier Code of Conduct, the supplier undertakes to notify WITTENSTEIN without delay and, to take remedial measures forthwith and provide proof thereof.
- In the event of a failure to comply with the Supplier Code of Conduct, WITTENSTEIN reserves the right to require remedial measures and to cease collaboration where necessary.