

# **Code of Conduct for Suppliers**

## **of EUROGATE GmbH & Co. KGaA, KG**

### **and the EUROGATE Group-Companies**

#### **("EUROGATE")**

## **I. Introduction / Preamble**

EUROGATE is committed to ecologically and socially responsible corporate governance. We expect the same behaviour from our suppliers, subcontractors and their respective affiliated companies and sub-suppliers. We also expect our employees to observe the principles of ecological, social and ethical behaviour. We also endeavour to continuously optimise our business activities and services in terms of sustainability. The Supplier Code of Conduct applies to the behaviour of all companies that have a direct contractual relationship with EUROGATE as well as to subcontractors and sub-suppliers who provide services for such companies or supply products to such companies on behalf of EUROGATE (hereinafter also referred to as "Supplier").

The aim of the Supplier Code of Conduct is to set minimum standards. We expect our Suppliers to contribute to this in the sense of a holistic approach and to act in accordance with the legal and ethical principles described in this Supplier Code of Conduct. Suppliers should also pass on these requirements in their supply chain.

The contracting parties agree that the following provisions shall apply to future co-operation and shall form the basis for all future deliveries.

## **II. Requirements for Suppliers**

### **1. Social responsibility**

EUROGATE respects and upholds human rights, ensures humane working conditions and promotes health-conscious behaviour. The same is required of our Suppliers. The Supplier must at least document compliance with the following principles:

a) Exclusion from forced labour

No forced labour, slave labour or comparable work may be used. All labour must be voluntary and without threat of punishment. Employees must be able to terminate their work or employment relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation. The hiring or use of security personnel must be prohibited if persons are treated in an inhumane or degrading manner or are injured during their deployment or if freedom of association is impaired.

b) Ban on child labour

The Supplier must ensure that child labour is never used and is required to comply with the recommendation from the ILO conventions on the minimum age for the employment of children. Child labour must be prohibited. When hiring young employees, the local laws for the respective legal minimum age must be observed.

c) Fair remuneration

Remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. Deductions from wages as a punitive measure are not permitted. The Supplier must ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

d) Fair working hours

Working hours must comply with local laws and collective labour agreements and must be adhered to and documented. Compensation to be paid to Supplier's employees must comply with applicable wage laws and collective bargaining agreements, including those relating to minimum wages, overtime and benefits.

e) Prohibition of discrimination

Unequal treatment of employees in any form is not permitted unless it is justified by the requirements of the employment. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin colour, disability, health status, political conviction, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

f) Freedom of association

The Supplier recognises the freedom of association and the right to collective bargaining. The right of employees to form and join organisations of their choice, to conduct collective bargaining and to strike must be respected.

g) Health protection; safety in the workplace

The Supplier is responsible for a safe and healthy working environment. It is expected that health hazards are excluded or minimised and that working hours and breaks, rest and holiday periods, remuneration and maternity/paternity leave are complied with in accordance with the applicable national regulations.

## **2. Ecological responsibility**

EUROGATE is constantly working on sustainable and environmentally friendly technologies and promotes sustainability and environmental awareness. The same is required of our Suppliers. It is expected that the Supplier complies with all applicable legal regulations and requirements for environmental protection and is committed to reducing emissions and lowering energy consumption and conserving natural resources as far as possible in order to protect the environment. This also applies to the avoidance of reductions in the quality of life, e.g. due to harmful soil changes, water and air pollution, harmful noise emissions and the denial of access to clean drinking water and sanitary facilities. The Supplier shall also ensure that all waste and waste water is disposed of or discharged in a safe and environmentally compatible manner in accordance with the applicable regulations.

## **III. Ethical business behaviour**

EUROGATE attaches great importance to dealing with all business partners with integrity and fairness. We expect our Suppliers to ensure a fair and responsible corporate policy and to comply with all relevant legal requirements.

- The standards of fair business, fair advertising and fair competition must be observed. The applicable antitrust laws must also be applied.
- The Supplier undertakes to protect the confidential information entrusted to it by EUROGATE, its customers or by other suppliers or other business partners.
- Intellectual property rights must be respected; technology and expertise must be transferred in such a way that intellectual property rights and customer information are protected.
- The highest standards of integrity must be applied to all business activities. The Supplier must pursue a zero-tolerance policy with regard to the prohibition of all forms of bribery, corruption, extortion and embezzlement.

## **IV. Realisation of the requirements**

We expect our Suppliers to identify risks within the supply chains and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the Supplier will inform EUROGATE promptly and, if necessary, regularly

about the violations and risks identified and the measures taken. Compliance with the requirements can be checked by EUROGATE through self-disclosures by the Supplier or in another suitable manner. In the event of a material breach of the principles and requirements of this Supplier Code of Conduct, EUROGATE is entitled to terminate the contractual relationships entered into within the scope of the business relationship in whole or in part with immediate effect.

## **V. Acknowledgement and consent of the Supplier**

The Supplier undertakes to act responsibly and to comply with the principles/requirements listed. The Supplier undertakes to communicate the content of this Supplier Code of Conduct to its employees, authorised representatives and subcontractors in a manner that is comprehensible to them and to take all necessary precautions to implement the requirements. The Supplier is bound by this declaration until further notice. This declaration shall expire when it is replaced by an updated version submitted by EUROGATE.