

SWARCO Group
Code of Conduct for suppliers
Sustainability management in the supply chain

July 2023



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1 Preamble

The SWARCO Code of Conduct for Suppliers (hereinafter CoC) comprises the requirements for suppliers with regard to sustainable business behavior in terms of Corporate Social Responsibility (hereinafter CSR). CSR means to manage business in a way that is based on applicable legal provisions and in accordance with environmental and social aspects.

All topics and the resulting requirements are summarized below. The CoC is based on international standards such as the OECD Guidelines and in particular the United Nations Global Compact.

For reasons of better readability, the simultaneous use of masculine and feminine forms of speech is dispensed with. All personal designations apply to all genders.

2 Environmental Responsibility

The supplier commits to continuously reduce the impact on the environment within the scope of his business activities. Key measures include:

- Preventing accidents that impact the environment
- Minimizing waste and emissions
- Using energy-saving technologies
- Integrating recycling processes
- Saving resources through consistent prevention/reduction of waste

Products must meet the usual environmental protection standards. When using hazardous substances and chemicals, the supplier commits to comply with the legal provisions and regulations (e.g. regulation (EG) No. 1907/2006 (REACH), directive 2011/65/EU (RoHS), Toxic Substances Control Act etc.) applicable to the supplier's affected business location, production site or market.

The supplier promotes the continuous development of the environmental policy and the assurance of transparency with regard to corporate decisions and activities that have an impact on society and the environment. This also includes the proper qualification of employees in the field of environmental responsibility.

3 Human Rights, Working Conditions, and Health

Protection

The supplier complies with all labour standards in accordance with applicable national laws and regulations and respects international standards. Employees must be protected against physical punishment as well as physical, psychological, sexual, and verbal harassment. Employees' privacy must also be ensured. In addition, all employees are entitled to an appropriate living wage through freely chosen work, as well as the right to engage in union activity and collective bargaining (joining trade unions).

No persons below the statutory minimum age may be employed. The supplier must not employ younger workers between the applicable minimum age and the age of 18 either at night or in conditions that may impair their health, safety, or moral integrity or their physical, mental, spiritual, or social development.

The supplier shall guarantee occupational safety and health protection in the workplace in accordance with the national provisions and also support ongoing enhancements to improve the working environment.

4 Ethics

Any discrimination against employees, in particular on the basis of national or ethnic origin, social origin, health status, personal status, pregnancy, disability, sexual orientation, age, gender, religion, ideology, lifestyle etc. is not permitted.

The supplier maintains his business relationships based on the values of honesty, fairness and integrity. This also applies to relationships and activities with all stakeholders, including subcontractors and other business partners.

5 Preventing Bribery and Corruption

The supplier shall commit to adhere to all statutory provisions concerning bribery, corruption, and acceptance of benefits. The following is prohibited in particular:

- Offering, promising, or providing personal benefits to officials in return to fail or to discharge any of their official duties
- Offering, promising, or providing illegal personal benefits to employees or representatives from other companies
- Allowing acts of bribery to take place with the help of others, such as relatives, friends, agents, advisors, planners, and intermediaries
- Supporting illegal activities undertaken by other persons

The supplier shall also commit to prohibit his employees from requesting or accepting personal benefits (e.g. an invitation to a meal or an event) from other persons within the scope of business activities or having such benefits promised to them. Such an advantage is only permitted if it does not create the impression of an expectation of consideration and is within the scope of generally accepted national business practices and does not violate any other legal regulations.

6 Data Protection

The supplier commits to to comply with all applicable data protection laws and provisions in his area of activity (e.g. directive General Data Protection Regulation (EU) 2016/679 , Data Protection Act 2018 etc.)

The supplier shall commit to implement and maintain suitable and state-of-the-art technical and organizational measures to ensure an appropriate level of data protection and to guarantee data security. In this way, the supplier must secure data of any kind against manipulation, loss, unauthorized access, and other threats. The supplier commits to treat any data received from SWARCO (personal, technical, or other data and data in digital or analog (paper) format) with the same care and in line with the same safety criteria as for his own data.

7 Antitrust and Competition Law

The supplier shall comply with the rules of antitrust and competition law, i.e.:

- Agreements with competitors regarding market divisions are not permitted
- Prices, quantities, conditions, etc. must not be agreed with competitors
- In general, contact with competitors must be restricted to the minimum necessary amount

8 Commitment

With the following signature, the supplier confirms to fully accept this CoC and to implement it accordingly in his organization. Furthermore, the supplier gives the customer permission to conduct announced company audits in order to be able to check the fulfilment of the requirements in reasonable periods of time and with suitable instruments to be able to initiate measures immediately in case of detected violations.

Company stamp:

Company

Place, date

Legally binding signature