

## APPENDIX 4

### SUPPLIER CODE OF CONDUCT

The Company is fully aware of the responsibility it bears towards its clients, shareholders, employees and the communities in which it works. Thus, the Company applies a strict set of ethical standards to guide it in its business dealings.

The Company expects all Suppliers, i.e. all companies who do business with any company or division of the Company (including but without limitation the Supplier), to adhere to the same ethical standards. For this purpose, the Company has drawn up this Supplier Code of Conduct, which sets the minimum standards for doing business with any the Company's Group companies or divisions.

#### **Laws and Ethical Standards**

The Supplier shall comply with all laws applicable to its business. The Supplier should support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and practice. This especially applies to:

#### **Human Rights and Fair Labour Practices**

- ***Child Labour***

The Supplier shall not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it shall be fifteen (15) years old. Workers under the age of eighteen (18) shall only perform work in accordance with legal requirements (e.g. with regards to working time and working conditions) and subject to any requirement regarding education or training.

- ***Forced Labour***

The Supplier shall not use any form of forced, bonded or involuntary labour. All labour must be voluntary. Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents). The Supplier shall ensure that workers do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period. The Supplier shall be responsible for payment of all fees and expenses (e.g. licenses and levies) relating to workers, where legally required.

Punishment, mental and/or physical coercion are prohibited. Disciplinary policies and procedures shall be clearly defined and communicated to the workers.

- ***Compensation and Working Hours***

The Supplier shall comply with all applicable national laws and mandatory industry standards regarding working hours, overtime, wages and benefits. The Supplier shall pay workers in a timely manner and clearly convey the basis on which workers are being paid.

Deductions from wages as a disciplinary measure shall not be allowed, if not legally permitted.

- ***Freedom of Association and Collective Bargaining***

The employees of the Supplier must be free to join or not to join a union/employee representation of their choice, free from threat or intimidation. The Supplier must recognise and respect the right to collectively bargain, in accordance with Applicable Laws.

- ***Diversity***

The Supplier shall promote an inclusive work environment that values the diversity of its employees. The Supplier shall not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under law.

#### **Health & Safety**

The Company expects its suppliers to strive to implement the standards of occupational health and safety at a high level by applying a health and safety management approach appropriate for the business. The Supplier shall comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, in order to preserve the health of employees, safeguard third parties and prevent accidents, injuries and work-related illnesses. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures. Employees are to be adequately educated and trained in health and safety issues. Supplier undertakes that it will comply with ISO45001, Occupational Health and Safety Management System (OHSMS).

#### **Data Protection and Disclosure of Information**

The Supplier shall adhere to relevant Data P and Security laws as well as to respective regulations, in particular with regard to the personal data of clients, customers, consumers, employees and shareholders. The Supplier shall comply with all said requirements when personal data is collected, processed, transmitted or used.

The Supplier shall safeguard and only make appropriate use of Confidential Information. The Supplier shall not disclose any information that is not known to the general public.

#### **Bribery and Corruption**

The Supplier shall comply with all national and international Anti-Bribery regulations as well as applicable Anti-Corruption laws, regulations and standards. The Supplier shall not (either directly or indirectly) offer or promise to provide anything of value to improperly influence an official act or to secure an improper advantage in order to obtain or retain business.

#### **Whistleblowing**

The Supplier shall ensure it maintains a Whistleblowing Policy consistent with the applicable government guidelines. It will ensure its employees understand the process to report any criminal offence, any risks to health and safety, risks or actual damage to the environment, miscarriage of justice, the supplier breaking the law or employees concealing any other wrongdoing.

#### **Trade Regulations**

The Supplier shall comply with all applicable Trade and Import regulations (including sanctions and embargoes) that apply to their activities.

#### **Money Laundering & Financial Records**

The Supplier shall comply with Applicable Laws and regulations designed to combat Money Laundering activities. The Supplier shall maintain financial records and reports according to international laws and regulations.

#### **Fair Competition**

The Supplier shall comply with applicable Competition and Anti-Trust laws.

#### **Conflicts of Interest**

A conflict of interest arises when an individual has a private/personal interest which could appear to influence his/her decisions. Such conflict of interest situations includes a relationship by blood or marriage, partnership, business partnership or investment. The Supplier shall disclose any actual or potential conflict of interest with the Company's personnel.

#### **Environment**

The Supplier shall comply with all applicable Environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.

the Company expects its business partners to strive to support the Company's climate protection goals through the products and services they deliver (e.g. by providing relevant data on climate protection). In this regard, the Company also expect the Supplier to take climate protection into account in its own operations, for example by setting appropriate climate protection goals for itself and achieving them.

#### **Business Continuity Planning**

The Supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases). This preparedness especially includes disaster plans to protect both employees as well as the environment as far as possible from the effects of the possible disasters that may arise within the domain of operations.

#### **Business Partner Dialogue**

The Supplier shall require its own suppliers, permitted subcontractors and employees to adhere to this Supplier Code of Conduct as part of fulfilling its contractual obligations. The Supplier remains liable to the Company for any breach of this Agreement by any of its suppliers, permitted subcontractors and employees.

#### **Compliance with The Supplier Code of Conduct**

Supplier will ensure it implements the necessary process within its organisation in order to comply with this Code of Conduct including the provision of training to its personnel.

The Company reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier to this Appendix 4 (Supplier Code of Conduct). The Company requires the Supplier to implement its own binding guidelines in turn requiring ethical behaviour from its own suppliers, and Supplier Representatives.

Any breach of the obligations stipulated in this Appendix 4 (Supplier Code of Conduct) is considered a Relevant or Material breach of contract by the Supplier.