

sudhoff gruppe policy statement / Code of Conduct for our Suppliers

The sudhoff gruppe is committed to responsible corporate governance. We expect the same behaviour from all our suppliers. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into the corporate culture. Furthermore, we strive to continuously optimise our business activities and our products and services in terms of sustainability and ask our suppliers to contribute to this in the sense of a holistic approach.

We buy sustainably and responsibly and we expect our suppliers to fully comply with applicable laws and also to follow internationally recognised environmental, social and governance (ESG) standards. We also expect our suppliers to use their best efforts to implement these standards in their suppliers and subcontractors.

In particular, we expect you as a supplier to recognise, support and comply with the following ESG standards. These are based on the principles of the United Nations Global Compact Initiative, the Code of Conduct of the international Business Social Compliance Initiative (BSCI), the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Environment

- You comply with all environmental, health and safety regulations incumbent upon you.
- You promote the safe and environmentally sound development and manufacture of your products, as well as their transport, use and disposal.
- You use appropriate management systems to ensure that product quality and safety meet applicable requirements.
- You protect the life and health of your stakeholders and your employees against hazards that may emanate from your manufacturing processes and products.
- You use resources efficiently, use energy-efficient and environmentally friendly technologies and reduce your waste as well as emissions to air, water and soil.
- You continuously reduce the impact of your operations on biodiversity, climate change and water scarcity.

Society

- With regard to your suppliers and subcontractors, you respect and support internationally proclaimed human rights.
- With regard to your suppliers and subcontractors, you support freedom of association and the right to collective bargaining in accordance with applicable laws.
- You treat your employees with due respect and create workplaces that are free from harassment or abuse of any kind and free from unlawful practices or discrimination in any form.
- You feel responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, you take the necessary precautionary measures against accidents and damage to health that may arise in connection with the activities. You also regularly inform and train your workers on applicable health and safety standards and measures.

- You enable your workers and other stakeholders in your company to anonymously report concerns or potentially unlawful practices in the workplace.
- You adhere to minimum wages and working hours in accordance with the law.
- You do not supply products containing conflict minerals that directly or indirectly finance or support armed groups and cause human rights abuses, as described in Annex II of the OECD Due Diligence Guidelines for Promoting Responsible Supply Chains of Minerals from Conflict and High-Risk Areas (OECD DDG). We expect you to conduct your due diligence in accordance with the OECD DDG recommendations.

Governance

- They comply with all applicable national and international trade laws and regulations, including but not limited to antitrust, trade control and sanctions regimes.
- They observe the due diligence recommendations of the OECD Due Diligence Guidelines for Responsible Business Conduct.
- They consider corporate integrity as the basis for business relationships.
- They prohibit all forms of bribery, corruption and money laundering.
- They prohibit gifts to private or public officials that are intended to influence business decisions or otherwise encourage them to violate their obligations.
- You respect the privacy and confidential information of all your employees and business partners and protect data and intellectual property from misuse.
- You implement an appropriate compliance management system that supports adherence to applicable laws, rules and standards.

We expect our suppliers in relation to supply chains to identify risks within them as well as to take appropriate measures. In the event of suspected violations as well as to safeguard supply chains with increased risks, we expect our suppliers to inform us promptly about the identified violations and risks as well as regularly about the measures taken.

It is important to us to ensure the principles of sustainable development in our supply chain. You can explicitly acknowledge the above principles or demonstrate your commitment to them through your own code of conduct or company policy that includes these standards. We reserve the right to conduct audits or assessments to ensure that you are complying with the laws, rules and standards and will take appropriate action regarding the business relationship if there is cause for concern. We also reserve the right to terminate any relationship if the principles set out are breached, no action is taken to remedy such breaches or systematic breaches are evident.

Date:

Supplier: