



Code of Conduct for Suppliers

February 2025

Content

- 1 Introduction 3
- 2 Requirements for Suppliers 4
 - 2.1 Social Responsibility 4
 - 2.1.1 Forced Labour 4
 - 2.1.2 Child Labour 4
 - 2.1.3 Fair Working Conditions 4
 - 2.1.4 Freedom of Association 4
 - 2.1.5 Non-Discrimination 5
 - 2.1.6 Health Protection and Workplace Safety 5
 - 2.1.7 Protection of Natural Resources and Livelihoods 5
 - 2.1.8 Grievance Mechanism 5
 - 2.1.9 Handling of Conflict Minerals 6
 - 2.2 Environmental Responsibility 7
 - 2.2.1 Reduction of Raw Material and Natural Resource Consumption 7
 - 2.2.2 Climate Protection 7
 - 2.2.3 Waste Management and Hazardous Substances 7
 - 2.2.4 Treatment and Discharge of Industrial Wastewater 8
 - 2.2.5 Air Emissions 8
 - 2.3 Ethical Business Conduct 9
 - 2.3.1 Fair Competition 9
 - 2.3.2 Confidentiality and Data Protection 9
 - 2.3.3 Intellectual Property 9
 - 2.3.4 Integrity, Bribery and Improper Advantage 9
- 3 Implementation of Requirements 10

1 Introduction

H. Hiendl GmbH & Co. KG is committed to responsible business practices that respect both the environment and society. We expect our suppliers to share this commitment. We also work continuously to improve the sustainability of our business activities and products, and we encourage our suppliers to do the same.

For our business relationships, we expect our suppliers and their suppliers to comply with the requirements set out below.

This Code of Conduct is based on national laws and regulations, such as the German Supply Chain Due Diligence Act (LkSG), as well as international conventions, including the United Nations Universal Declaration of Human Rights and the International Labour Organization's (ILO) international labour standards.

2 Requirements for Suppliers

We expect our suppliers to comply with the following requirements regarding social and environmental responsibility as well as ethical business conduct.

2.1 Social Responsibility

2.1.1 Forced Labour

No forced labour, slave labour or any comparable form of labour shall be used. All work must be voluntary and performed without the threat of punishment. Employees must be able to leave their work or terminate their employment relationship at any time. Furthermore, unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment, and humiliation, must not occur.

2.1.2 Child Labour

Child labour must not be used at any stage of production. Suppliers are required to comply with the recommendations of the ILO Conventions regarding the minimum age for the employment of children. Accordingly, the minimum age shall not be lower than the age at which compulsory schooling ends under the law of the place of employment and, in any case, not below 15 years of age.

The rights of young workers must be protected. Persons under the age of 18 may not be employed for work that is harmful to the health, safety or morals of children. Special protective regulations must be observed.

2.1.3 Fair Working Conditions

All employees must be informed of their rights and the conditions of their employment in an understandable manner and, where required by national regulations and laws, must have written employment contracts.

Compensation for regular working hours and overtime must comply with the national statutory minimum wage or, where higher, the industry minimum standards. Payment must be sufficient to enable employees and their families to maintain a decent standard of living. Employees shall be granted all legally required social benefits. Wages must be paid on time, regularly and in full in a legal currency. Wage deductions as a disciplinary measure are not permitted.

Working hours (including overtime, breaks and rest periods), as well as regulations regarding vacation, illness and special circumstances (e.g. pregnancy), must comply with applicable laws or industry standards.

2.1.4 Freedom of Association

The right of employees to form, join and participate in organisations of their own choosing, to engage in collective bargaining and to strike shall be respected. Employees shall not be

discriminated against based on the establishment of, membership in, or participation in such organisations. Employee representatives shall be granted free access to the workplaces of their colleagues and the opportunity to interact with them.

2.1.5 Non-Discrimination

Discrimination and unequal treatment of employees in any form are prohibited. No person shall be discriminated against on the basis of skin colour, gender, age, religion or belief, social background, health status, ethnic origin, nationality, membership in employee organisations, political affiliation or opinion, or sexual identity. This applies, among other things, to the recruitment of employees and to training, promotion and remuneration.

2.1.6 Health Protection and Workplace Safety

The supplier is responsible for providing a safe and healthy working environment. Appropriate occupational health and safety systems shall be established and applied to take the necessary preventive measures against accidents and health hazards that may arise in connection with work activities.

Excessive physical or mental fatigue shall be prevented through appropriate measures. Employees shall be regularly informed and trained regarding applicable health and safety standards and measures. Minimum requirements include adequate lighting, temperature control and ventilation, the provision of drinking water, adequate sanitary facilities, and access to occupational medical care.

2.1.7 Protection of Natural Resources and Livelihoods

The supplier shall not unlawfully deprive individuals of land, forests or waters whose use secures their livelihood. Harmful soil contamination, water pollution, air pollution, noise emissions and excessive water consumption shall be avoided where they impair the health of individuals, significantly affect the natural basis for food production, or prevent access to safe drinking water or sanitation facilities.

2.1.8 Grievance Mechanism

The supplier shall communicate information regarding the accessibility, responsibilities and implementation of a grievance procedure to its employees in an appropriate manner. The grievance procedure must be accessible to employees while ensuring confidentiality of identity and effective protection against retaliation.

The supplier is responsible at operational level for establishing an effective grievance mechanism for individuals and communities that may be affected by adverse impacts.

2.1.9 Handling of Conflict Minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as other raw materials such as cobalt, the company establishes processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects the same from its suppliers.

Smelters and refiners that do not meet appropriate, audited due diligence standards should be avoided.

2.2 Environmental Responsibility

In addition to applicable local environmental laws, all internationally recognised environmental standards must be observed.

2.2.1 Reduction of Raw Material and Natural Resource Consumption

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided. This may be achieved directly at the source or through procedures and measures such as changes to production and maintenance processes, modifications to company procedures, the use of alternative materials, resource conservation, recycling or the reuse of materials.

2.2.2 Climate Protection

All suppliers are expected to take appropriate measures to reduce their carbon footprint and thereby contribute to achieving the goals agreed upon under the Paris Climate Agreement and the 1.5°C target of the Intergovernmental Panel on Climate Change (IPCC).

Suppliers are encouraged to identify economically viable solutions to improve energy efficiency and minimise energy consumption and greenhouse gas emissions.

2.2.3 Waste Management and Hazardous Substances

The supplier shall follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste.

The prohibitions on the export of hazardous waste under the Basel Convention of 22 March 1989, as amended, shall be observed.

Chemicals and other materials that pose a hazard if released into the environment shall be identified and managed in a manner that ensures safety during handling, transportation, storage, use, recycling, reuse and disposal.

Mercury shall be used in accordance with the prohibitions of the Minamata Convention of 10 October 2013, and persistent organic pollutants shall be managed in accordance with the Stockholm Convention of 23 May 2001, as amended (POP Convention).

Hazardous substances, chemicals and materials shall be labelled, and their safe handling, movement, storage, recycling, reuse and disposal shall be ensured. All applicable laws and regulations concerning hazardous substances, chemicals and materials (in particular the REACH Regulation and POP Regulation) must be strictly observed. Applicable substance restrictions and product safety requirements shall be complied with.

2.2.4 Treatment and Discharge of Industrial Wastewater

Wastewater generated from operational activities, manufacturing processes and sanitary facilities shall be characterised, monitored, inspected and, where necessary, treated prior to discharge or disposal.

Furthermore, measures should be implemented to reduce wastewater generation.

2.2.5 Air Emissions

General emissions from operational activities (air and noise emissions) as well as greenhouse gas emissions shall be characterised, routinely monitored, reviewed and, where necessary, treated prior to release.

The supplier shall also monitor its emission control systems and is encouraged to identify economically viable solutions to minimise emissions of any kind.

2.3 Ethical Business Conduct

2.3.1 Fair Competition

Standards of fair business practices, fair advertising and fair competition shall be observed.

Applicable antitrust and competition laws shall be complied with, particularly regarding agreements and other activities with competitors that influence prices or conditions.

Furthermore, such regulations prohibit agreements between customers and suppliers that restrict customers' freedom to independently determine prices and other terms for resale.

2.3.2 Confidentiality and Data Protection

The supplier commits to protecting private information in a way that reasonably meets the expectations of its clients, suppliers, customers, consumers, and employees. When collecting, storing, processing, transmitting and sharing personal information, the supplier shall comply with applicable data protection and information security laws as well as regulatory requirements.

2.3.3 Intellectual Property

Intellectual property rights shall be respected. Technology and know-how transfers must be conducted in a manner that protects intellectual property rights and customer information.

2.3.4 Integrity, Bribery and Improper Advantage

The highest standards of integrity shall form the basis of all business activities.

The supplier shall not tolerate any form of bribery, corruption, extortion, or embezzlement. Appropriate procedures for monitoring and enforcing compliance shall be implemented to ensure adherence to anti-corruption laws.

3 Implementation of Requirements

We expect our suppliers to identify risks within their supply chains and to take appropriate measures to prevent, minimise and remedy adverse impacts.

Compliance with the standards and requirements set out in this Code of Conduct is not routinely audited by H. Hiendl GmbH & Co. KG. We assume that these requirements are observed and implemented by our suppliers as part of their legal and regulatory obligations.

If a violation of the provisions of this Code of Conduct becomes known, the supplier will be informed and requested to take appropriate corrective actions to bring its conduct into compliance with these requirements.

If such a violation has occurred intentionally or negligently, or if the supplier fails to implement appropriate corrective measures within a reasonable period of time, H. Hiendl GmbH & Co. KG reserves the right to terminate the business relationship.



HELMUT HIENDL

Managing Director