

# Code of Conduct for Suppliers

Collaboration basics

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## 1. Foreword

Sustainability in the sense of ecological, economic and social responsibility is a key success factor for Klubert + Schmidt and a cornerstone of our procurement strategy. We also expect this behaviour from our suppliers. We also expect our employees to comply with the principles of ecological, social and ethical behaviour and integrate such principles into the corporate culture. We also endeavour to continuously optimise our business activities and our products in terms of sustainability and ask our suppliers to contribute to this in the spirit of a holistic approach.

In terms of future collaboration, the contracting party agrees to comply with the following rules forming part of a common code of conduct. This agreement forms the basis for all future deliveries. The contracting party is required to comply with the principles and requirements of the code of conduct and must ensure that it contractually requires its subcontractors to comply with the standards and regulations set out in this document.

Klubert + Schmidt reserves the right to subject its suppliers to checks and audits to verify compliance with the code of conduct.

## 2. Compliance with rules and regulations

Klubert + Schmidt respects and complies with all relevant and applicable local, national and international laws and regulations. This compliance forms the basis of our long-term success. Violations of this can result in significant damage and have serious consequences for the company as well as for employees and business partners.

Violations are not tolerated by Klubert + Schmidt, so we ask our suppliers to similarly ensure compliance with the applicable rules and regulations.

## 3. Human rights, forced labour, child labour and prohibition of force

We respect the internationally established human rights of all individuals within our sphere of influence. We respect the basic principles of the general charter of human rights according to the UN's guiding principles on business and human rights and the ten principles of the UN Global Compact. Therefore, we refuse any form of forced labour and child labour and are against any form of compulsory labour. In addition, no-one should suffer physical or psychological violence - including and especially as a disciplinary measure. Sexual harassment, coercion and bullying are also considered forms of psychological violence that will not be tolerated under any circumstances.

We also expect strict compliance with these principles from our suppliers.

## 4. Fair working conditions

We expect our suppliers to provide their employees with appropriate remuneration, and fair working conditions, which at least comply with local legal requirements, relating to working hours for example. Should this not be the case, a living wage must be guaranteed in accordance with local living conditions.

## 5. Discrimination

The supplier must comply with all applicable provisions regarding the prohibition of discrimination in recruitment and employment due to race, skin colour, nationality, disability, physical constitution, sexual orientation, health status, political beliefs, gender, age, appearance or membership of associations, parenthood or other legally protected characteristics.

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## 6. Freedom of association

The right of workers to form and join organisations of their choice, to bargain collectively and to strike must be respected. In cases in which the freedom of association and the right to collective bargaining are legally restricted, alternative options for independent and free association of employees for the purpose of collective bargaining must be provided. Employee representatives are to be protected from discrimination. Employees may not suffer discrimination due to the founding, involvement in or membership of such an organisation.

## 7. Compliance and fair competition

We expect our suppliers to comply with all applicable laws and regulations regarding corruption, bribery, fraud and prohibited business practices.

Klubert + Schmidt believes in fair competition. We expect our suppliers to refrain from engaging in anti-competitive and anti-trust practices and to also ensure this does not take place in the supply chain.

## 8. Work and health protection

Health and safety in the workplace for all employees within the value chain takes top priority. We expect our suppliers to take all necessary measures to ensure a safe working environment free from health risk factors, as far as this is possible. We see this as a given. We expect to see the continuous development of occupational health and safety in our suppliers' companies so that accidents can be prevented. We expect appropriate training and safety instruction to be carried out regularly and appropriate protective equipment to be made available.

## 9. Environmental permits and land grabbing

Suppliers must ensure that all necessary environmental permits and permissions are procured, kept up to date and complied with so that practices are lawful at all times. Illegal displacement and unlawful appropriation of land, forests and water are strictly prohibited.

## 10. Hazardous substances

The supplier is required to appropriately identify any hazardous substances, chemicals or materials and to ensure their safe handling, movement, storage, recycling, reuse and disposal.

## 11. Data protection and information security

Compliance with national and international regulations on the protection of personal data is essential for Klubert + Schmidt GmbH. We ask our suppliers to protect information from misuse, loss, destruction and manipulation. Data processed using IT systems must be protected as well as possible, and at least in line with the minimum legal standards.

## 12. Confidentiality

We treat information we receive in the context of the business relationship as strictly confidential. In return, we expect our suppliers to handle the information they have acquired about Klubert + Schmidt over time responsibly and confidentially. Data such as product information, prices, customer data, employee information and other information about working practices and organisation is to be treated in a strictly confidential manner and may only be used and communicated, if at all, subject to written authorisation. The same applies to information about the joint business relationship.

With this in mind, each supplier must sign a confidentiality agreement.

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## 13. Climate and environmental protection

Klubert + Schmidt implement targeted measures to improve climate and environmental protection. We also expect our suppliers to contribute to environmental and climate protection and to use their resources responsibly. The use of modern, environmentally-friendly technologies and the recycling of metals in the value chain should play a key role in order to continuously improve processes.

## 14. Handling of conflict minerals

The supplier is required to comply with the regulations on prohibited and declarable substances, e.g. conflict materials, RoHs, REACH, PFAS, etc, and to demonstrate such compliance to Klubert + Schmidt on request.

## 15. Continuous improvement

We maintain and strengthen our position on the global market through a continuous improvement process in which all employees are involved. We consider all procedures and processes holistically. In order to adapt to increasing, global requirements, a high level of motivation and continuous improvement of work and system productivity are essential. We also encourage our suppliers to initiate and implement their own improvement processes.

## 16. Reporting of any kind of misconduct/information on violations

If the supplier becomes aware of any violations of this code of conduct in the supply chain, notably potential human rights violations and unlawful business practices, they must report this to Klubert + Schmidt using the contact form on our homepage. The supplier must advise their employees of how to report any such violations. The process must be accessible for employees in a manner that allows them to keep their identity confidential and protect them from discrimination.

## 17. Violations and consequences

In the event of violations of the principles included in this code, Klubert + Schmidt expects its suppliers to implement appropriate measures to stop such violations immediately, and to take precautions to ensure that similar violations do not occur in the future. If Klubert + Schmidt becomes aware that a supplier has not implemented adequate measures to avoid violations of the rules included in this code, Klubert + Schmidt reserves the right to terminate the business relationship including all related supply contracts.

## 18. Validity and processing of the code

This code of conduct is valid immediately. We expect our suppliers to apply and consider the rules globally.

Klubert + Schmidt will review this code regularly and make any necessary changes. Suppliers are always informed of any significant changes. The current version of the code can be found in the downloads area on our website.

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### 19. Agreement to the Klubert + Schmidt supplier code

We hereby acknowledge the supplier code of Klubert + Schmidt and confirm that we comply with the included rules and requirements, share these with our supply chain, and check compliance regularly.

We confirm this for the complete business relationship with Klubert + Schmidt.

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Supplier's date/signature and stamp

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Signatory's name in block capitals