

## Code of Conduct for Suppliers of GeWiS Companies

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This Code of Conduct defines the principles and requirements of the GeWiS Group (hereinafter referred to as "GeWiS") for its suppliers of goods and services. The supplier hereby declares:

### Compliance with legal regulations and contractual terms

- to comply with the laws and regulations of the applicable legal systems and contractual terms

### Human rights and working conditions

#### - ***Prohibition of child labor***

- not to employ any workers under the age of 15

In countries covered by the exemption of International Labor Organization Convention No. 138 for developing countries, not employ workers under the age of 14.

- not to employ any workers under the age of 18 in hazardous work according to International Labor Organization Convention No. 182

#### - ***Prohibition of forced labor***

- to reject all forms of forced labor, slavery, modern slavery, oppression, exploitation, human trafficking, and torture

#### - ***Equal opportunities and fair treatment***

- to promote and adhere to ethical recruitment, diversity and inclusion, non-discrimination, equal opportunities, and equal treatment of employees regardless of their skin color, race, nationality, social origin, disability, sexual orientation, political or religious beliefs, marital status, gender, or age

- to support and uphold the rights of women, minorities, and indigenous peoples

- not to accept forced evictions

- not tolerate inappropriate treatment of employees, such as psychological and physical violence and cruelty, sexual harassment or discrimination, including gestures, language and physical contact that are sexually coercive, threatening, offensive or exploitative (mobbing, bossing, stuffing, bullying)

- provide employees with training and skill development

- if the requirements and tasks are comparable, to apply the principle of equal pay and benefits for work of equal value, regardless of employee diversity

#### - ***Freedom of association and collective bargaining***

- to the extent permitted by law, recognize the freedom of association of employees and collective bargaining, the existence of works councils, the right of workers to information, consultation, and participation

- not to disadvantage or discriminate against members of works councils, organizations, or trade unions.

#### - ***Work-life balance, fair working conditions***

- comply with applicable working time regulations worldwide

- to comply with the legal provisions on minimum wages in the respective countries, even in the case of cross-border posting of employees

#### - ***Occupational health and safety, security personnel***

- to take responsibility for the health and safety of their employees in the workplace, minimize risks, and take the best possible preventive measures against accidents and occupational diseases

- to conduct regular training and ensure that all employees are familiar with occupational safety

- to introduce and implement an appropriate occupational health and safety management system in accordance with or analogous to ISO 45001.

- when private or public security forces are involved, to ensure that there is no risk of torture and cruel, inhuman, and degrading treatment or harm to life and health, and treatment contrary to applicable legislation.

#### - ***Whistleblowing system***

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- to provide access to an anonymous, protected procedure for reporting any violation of this Code of Conduct and ensure the protection of whistleblowers or complainants from retaliation
  - **Export controls and economic sanctions**
- to trade and deliver in strict compliance with regulations and sanctions imposed by the UN, EU, and other countries

### Environmental and climate protection and protection of natural habitats

- to protect the environment with regard to the rights of future generations and to strive for a balance between economic and environmental interests in its business activities
- to protect the environment in accordance with legal norms and international standards with the aim of minimizing and continuously reducing environmental pollution
- to introduce and implement an appropriate environmental management system in accordance with ISO 14001
  - to implement measures to reduce greenhouse gases
  - to prevent air, water, and soil pollution
  - to implement measures to increase energy efficiency, use renewable energy sources, and reduce water consumption to a minimum
  - not to accept illegal expropriation/seizure/land grabbing, to ensure the protection of soil, air, forests, water and marine resources, living organisms, and to promote the protection of biodiversity
  - to ensure measures for sustainable use of resources, give preference to recycled materials, promote the circular economy, reduce the amount of waste, packaging material, plastics, and process them properly
  - in the case of suppliers of products and services for the automotive industry, to have access to IMDS, where it is mandatory to document relevant information

### Business relationships

- **Prohibition of corruption and bribery**
  - not to tolerate or participate in any form of corruption or bribery, including any illegal offers, payments, or similar incentives to government officials with the aim of influencing decision-making.
  - to enable all interested parties to lodge complaints and ensure the protection of whistleblowers
- **Preventing conflicts of interest**
  - to make decisions on an objective basis and avoid conflicts of interest both internally and in relation to customers
- **Intellectual property rights**
  - to comply with legislation relating to intellectual property rights, prohibit plagiarism and parts counterfeiting
- **Free competition**
  - to comply with applicable competition and antitrust laws and regulations, and exclude price, market, and bid manipulation
- **Financial responsibility, money laundering, terrorist financing**
  - not to support money laundering or the financing of terrorism and war conflicts directly or indirectly
- **Conflict minerals**
  - not to finance armed groups directly or indirectly through the procurement of raw materials from conflict and risk areas in order to prevent human rights violations, corruption or similar negative effects
- **Data and information protection and security**

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- to ensure the protection of personal data and the security of all business information in accordance with legal requirements and applicable data protection and information security laws
- to comply with applicable laws and regulations in the field of artificial intelligence and cyber security

### **Quality**

- to implement and apply a quality management system in accordance with ISO 9001 and further develop this system in accordance with IATF 16949, if it is a supplier of products and services for the automotive industry and unless otherwise required
- to comply with MAQMSR if it is a supplier of products and services for the automotive industry that does not have a certified quality management system in accordance with IATF 16949 and unless otherwise required

#### - **Disclosure of information**

- to commit to transparent disclosure of relevant information about its activities

#### - **Political engagement**

- to require the company to provide information on activities and commitments related to the exercise of political influence, including lobbying activities

#### - **Supply chain**

- to reasonably require compliance with the code of conduct among its suppliers
- to adhere to the principles of non-discrimination and transparency in the selection of suppliers and in dealings with suppliers
- to manage relationships with suppliers, including payment procedures, in accordance with the relevant legislation governing the concept of sustainability

#### - **Foreign trade law**

- to comply with applicable binding requirements of export, import, customs, and foreign trade law