

SUPPLIER CODE OF CONDUCT

SUSTAINABILITY STANDARDS FOR BUSINESS PARTNERS
OF THE SCHNELLECKE GROUP



Foreword

The Schnellecke Group is committed to the principles of corporate responsibility towards customers, employees, the environment and society, and expects the same from its suppliers and business partners.

The following principles are the minimum requirements of the Schnellecke Group for all business partners regarding human rights, labor standards, business ethics, resource conservation, environmental protection and social standards. The minimum standards are based on the Human Rights Declaration and the principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the conventions of the International Labor Organization (ILO) and are in accordance with applicable law and international standards.

The Schnellecke Group has set up the same provisions and standards for its own operational practice with its Code of Conduct. In addition, the Schnellecke Group expects business partners to comply fully with all applicable rules, standards and laws, to take them into account in their corporate policies and, furthermore, to pass them on to their own supply chain.

The Schnellecke Group supports suppliers in implementing the requirements through targeted information and training.

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1. Business ethics and compliance

The Schnellecke Group expects from its business partners responsible and lawful behavior as well as the passing on of this expectation to its own business partners in the supply chain. Business is to be conducted with the highest integrity, honestly and fairly by companies throughout the supply chain in accordance with applicable laws. This includes, in particular:

1.1 Prohibition of corruption

As a business partner of the Schnellecke Group, you reject any form of corruption and undertake to ensure that your own employees and company representatives do not offer or accept any bribes or other forms of benefits to and from customers, public officials or other third parties.

1.2 Avoidance of Conflicts of Interest

Suppliers and business partners of the Schnellecke Group are requested to make their business decisions exclusively based on objective criteria, and not to allow themselves to be influenced by personal or extraneous interests or relationships.

1.3 Fair market behavior

Suppliers and business partners of the Schnellecke Group must comply with the applicable laws on antitrust and competition. As a business partner of the Schnellecke Group, you respect fair competition and fully comply with the prohibition on anti-competitive agreements with competitors and suppliers.

1.4 Prohibition of Money Laundering

As a business partner of the Schnellecke Group, you ensure within the scope of your business activities that the respective applicable legal provisions against money laundering are complied with.

1.5 Protection of trade secrets, intellectual property and confidential information

Suppliers and business partners of the Schnellecke Group must observe the applicable laws for the protection of information, trade secrets and personal data of employees, customers, suppliers and other third parties. As a business partner of the Schnellecke Group, you are requested to obligate your employees to comply accordingly and not to disclose data worthy of protection to third parties without authorization.

1.6 Import and export controls

As a business partner of the Schnellecke Group, you ensure within the scope of your business activities that you comply with all applicable laws for the import and export of goods, services and information and that you observe the applicable sanctions.

1.7 Financial Responsibility and Disclosure of Information

As a business partner of the Schnellecke Group, you are required to fulfill your responsibility for keeping and publishing books, records and business information in accordance with applicable law and in compliance with generally accepted accounting principles.

2. human and labor rights standards

The Schnellecke Group is committed to its social responsibility. We also expect this from our business partners. As a business partner of the Schnellecke Group, you ensure that you comply with and protect social standards and human rights, anchor them in your own corporate policy and ensure this throughout your supply chain. The following principles are of particular importance in this regard:

2.1 Compliance with and respect for human rights

Suppliers and business partners of the Schnellecke Group are required to respect the globally applicable regulations for the protection of human rights and to promote their observance. As a business partner of the Schnellecke Group, we expect that in all business activities within your own sphere of influence, you will work to ensure that you yourself and none of your own business partners commit or are involved in human rights violations.

2.2 Outlawing child labor

Suppliers and business partners of the Schnellecke Group may under no circumstances use child labor or cooperate with business partners that do so. As a business partner of the Schnellecke Group, you are required to adhere to the minimum requirements of the ILO conventions on the minimum age for admission to employment and on the prohibition of child labor (ILO 138 and 182).

2.3 Outlawing forced labor and modern slavery

As a business partner of the Schnellecke Group, you are required to take suitable and appropriate measures to prevent bonded labor, forced and compulsory labor, as well as any form of modern slavery and human trafficking in your own business operations and along the supply chain.

2.4 Fair Wages, Working Hours and Holidays

Suppliers and business partners of the Schnellecke Group are required to ensure that their employees are paid appropriately and in accordance with the legal requirements for minimum wages, collective bargaining laws and statutory social benefits. If there are no legal or collectively agreed regulations, remuneration should be based on the industry-specific and locally customary remuneration and benefits. In addition, you are required to ensure that working hours and paid vacation times comply with applicable legal requirements.

2.5 Freedom of association and collective bargaining

Suppliers and business partners of the Schnellecke Group must uphold the freedom of association and the right to collective bargaining. To this end, they must ensure that their employees can join a union or form a representation in accordance with applicable laws.

2.6 Occupational safety and health protection

Suppliers and business partners of the Schnellecke Group comply with the respective applicable national regulations for occupational health and safety as well as fire protection. As a business partner of the Schnellecke Group, you support further development to improve working conditions.

2.7 Protection against discrimination

Suppliers and business partners of the Schnellecke Group are obligated to refrain from any form of discrimination, harassment, intimidation or unjustified disadvantage. In particular, unequal treatment on the basis of ethnic, national or social origin, skin color, gender, pregnancy, religion, ideology, illness, age, disability, sexual orientation, political or trade union activity is prohibited.

3. Sustainability, environmental protection and product safety

The Schnellecke Group expects from its business partners and their suppliers throughout the entire supply chain to handle resources and raw materials in a sustainable, responsible, and careful manner. Business partners shall ensure efficient use of energy and resources in products and processes as well as compliance with applicable environmental standards. The business partners shall strive in particular to:

3.1 Ecological responsibility

Suppliers and business partners of the Schnellecke Group must operate responsibly and sustainably with regard to environmental protection and make all reasonable efforts to protect the environment and to minimize negative effects on the environment as well as to conserve resources. To this end, they comply with all applicable legal requirements for environmental protection and sustainability and hold all environmental permits and licenses required for their company. Chemicals and other substances that could pose a hazard if released into the environment must be identified. A suitable hazardous substance management system must be established so that they can be safely handled, stored, transported and disposed of using appropriate procedures.

3.2 Reduction of greenhouse gases (decarbonization)

As a business partner of the Schnellecke Group, you are required to take appropriate measures to reduce air emissions that pose a threat to environment and health, including greenhouse gas emissions.

3.3 Efficient Use of Resources and Energy

Suppliers and business partners of the Schnellecke Group are encouraged to take appropriate measures for the efficient use of energy, water and raw materials. In addition, the use of renewable energy and resources should be strived for to ensure that environmental and health damage is minimized.

3.4 Use of Security Forces & Refraining from Forced Evictions

Suppliers and business partners of the Schnellecke Group should ensure that the commissioning or use of security forces does not lead to human rights violations. In addition, they shall observe the prohibition of unlawful forced eviction and the prohibition of unlawful deprivation of land, forests and bodies of water when acquiring, building on or otherwise using them.

3.5 Protection of minorities, people in need of protection and indigenous peoples

Suppliers and business partners of the Schnellecke Group respect the right to humane living conditions of minorities, people in need of protection and local communities in their business environment.

3.6 No impairment of land, water, and air

As a business partner of the Schnellecke Group, you ensure that you do not cause any harmful soil changes, water pollution, air pollution, harmful noise emissions or excessive water consumption that could lead to a significant impairment of the natural basis for food and drinking water or human health.

3.7 Implementation of environmentally friendly disposal and recycling management concepts

Suppliers and business partners of the Schnellecke Group strive to implement suitable and appropriate measures for the avoidance of waste, the reuse of resources, recycling as well as the safe and environmentally friendly disposal of residual waste, chemicals and wastewater.

3.8 Biodiversity and Animal Protection

Suppliers and business partners of the Schnellecke Group shall ensure that the applicable laws and international regulations on biodiversity and the protection of natural ecosystems are observed. In addition, business partners are encouraged to support and promote ethically sound and species-appropriate treatment of animals.

3.9 Responsible raw material supply chain

The Schnellecke Group expects from its suppliers and business partners to ensure responsible procurement of resources. You are required to avoid the procurement and use of conflict materials that have been obtained illegally or through ethically reprehensible or unreasonable measures. To comply with your due diligence along the supply chain, we recommend the use of appropriate documentation measures.

3.10 Product Safety

Suppliers and business partners of the Schnellecke Group observe all applicable product safety regulations. All products and services must meet the contractually defined criteria for quality, safety and labeling upon delivery.

4. Implementation of corporate due diligence obligations

For the Schnellecke Group, the declaration of its suppliers that they will fulfill their social and ecological responsibility is the prerequisite for every business relationship. The supplier must align its business and procurement activities with these principles and address them appropriately along its supply chain.

4.1 Verification of compliance with the Sustainability Standards

The Schnellecke Group reserves the right to verify compliance with the sustainability standards in the supply chain by appropriate means. This verification can be carried out by means of a (digital) questionnaire (supplier self-disclosure on the Integrity Next platform) or through the use of experts on-site, whereby the latter may only take place after prior announcement and in the presence of representatives of the business partner. The self-responsible compliance with our sustainability standards must be carried out in such a way that no further costs are caused for the Schnellecke Group.

4.2 Violation of the Sustainability Standards

If a business partner violates or does not comply with the sustainability requirements, the Schnellecke Group reserves the right to take appropriate steps (these may be requests to implement improvements or countermeasures, up to and including termination of the business relationship).

4.3 Reporting Misconduct

The compliance whistleblower system of the Schnellecke Group is available for hints of serious violations of rules and laws by employees belonging to the Group. Within the framework of a transparent and fair procedure, whistleblowers, affected parties and the company are equally protected.

If there are specific indications of potential misconduct, we ask you to report them (anonymously and in the local language, if desired) via our whistleblowing system:

compliance@schnellecke.com

+49 5361 301 330

or

Personal / Confidential
Schnellecke Group AG & Co. KG
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