

# Supplier Code of Conduct

## 1. Introduction

We at Brückner Group have and follow established core business values and business ethics. However, we understand that these core values can only be achieved, if the Brückner Group on the one hand and our suppliers and other third-party service providers (together “Our Partners”) on the other hand work together.

Therefore, we would like to agree with you on common rules (“Our Rules”), which shall be the basis of our business relationship.

## 2. Our Rules

### 2.1 Applicable Laws and Regulations

We are complying with applicable local and international laws and regulations as a minimum standard.

### 2.2 Brückner Group Code of Conduct

We adhere to our Code of Conduct that requires all of our employees and staff to behave in an ethical, law-abiding manner. It contains - among others - our understanding on how the Brückner Group wishes to handle topics like:

- Social responsibility
- Diversity, Equity and Inclusion
- Prohibition of corruption
- Gifts and invitations
- Transparency and conflicts of interests
- Sponsoring and donations
- Prohibition of money laundering
- Protection and security of personal data
- Protection of business and trade secrets, company property and IT Security
- Fair competition
- International trade in goods and services
- Environmental protection
- Truthful information

The most recent update to this Code of Conduct can be found on our website under:

[www.brueckner.com/en/about-us/compliance](http://www.brueckner.com/en/about-us/compliance)

### 2.3 Human Rights, Social and Ecological Aspects of Our Business Activities

#### Human Rights / Labor Practices

##### **Health and occupational safety**

An environment of health and safety ensures that safe working conditions are provided to employees in accordance with applicable laws and other international standards. Risks stemming from necessary operations shall be reduced by approved codes of practices. Health and safety policies must be implemented, the implementation must be supervised, reviewed and improved, if necessary.

**Prohibition of child labor**

Each child has a right to personal development and education. International rules have been created to regulate the minimum age for employment, being - among others - the higher of 1) the respective country's statutory minimum age, 2) the age for completing compulsory education and 3) the age of 15 years.

**Prohibition of forced labor**

Although forced labor is universally condemned, many workers are in fact worldwide still trapped in various situations of forced labor, through different kinds of threats or other forms of violence. Any type of forced labor or slavery as well as any type of violence against workers, e.g. by security staff, cannot be tolerated. Workers should in addition be informed at any time about their statutory rights and contract termination rights. Furthermore, the right of freedom of association and collective bargaining should be accepted.

**Non-discrimination and equal remuneration**

We recognize that various cultures exist, and we respect cultural differences when doing business. Discrimination of any employees or other workers as defined in ILO Convention No. 100, 111, in particular those based on attributes like race, gender, age, color, ethnicity or national origin, sexual orientation or marital status, disability, religion, political views, union membership or social origin in all employment practices, such as applications for employment, hiring, promoting, rewarding, granting access to training, job assignments, wages, benefits, discipline, termination or retirement is not acceptable. Remuneration should be fair and respecting minimum wages and overtime compensation rules as specified under applicable laws and regulations.

**Environmental Practices**

The Brückner Group respects the applicable international environmental conventions, in particular regarding:

**The use of mercury**

The Minamata Convention adopted in 2013 regulates the manufacture of products containing mercury, the use of mercury and mercury compounds in general and during the manufacturing process, as well as the treatment of mercury containing waste.

**The use of persistent organic pollutants**

The Stockholm Convention of 23 May 2001 on persistent organic pollutants regulates the handling of certain chemicals regarding the production and use, handling, collection, storage and disposal of waste consisting of these chemicals.

**The use of hazardous waste**

The Basel Convention on Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 covers toxic, poisonous, explosive, corrosive, flammable, ecotoxic and infectious wastes. It prescribes rules to the transboundary movements of such hazardous waste and obliges its parties to ensure that such waste is handled and disposed of in an environmentally friendly manner. Contracting parties are not only obliged to prevent or at least to minimize the generation of waste at source, but also to minimize transported quantities by treating and disposing waste as close as possible to its place of origin.

### 3. General Supplier Commitment

We are committed to maintaining long-term relationships with those of Our Suppliers, who share the same core business values with us. We together wish to make a positive impact on the ecological and social aspects of our common business activities.

Therefore, we expect Our Partners

- to behave in a way that is not only compliant with applicable laws and regulations, but also with this Supplier Code
- but also in a way that it enables and encourages our employees to adhere to the provisions of our Code of Conduct;
- to take precautionary measures to avoid and mitigate harm to affected human beings and the environment;
- to implement a procedure on how to regularly train their employees on the topics referenced above; and
- to notify us and support our endeavors to investigate possible violations of Our Rules.

In order to effectively establish a procedure to fulfill this Commitment, Our Suppliers will need to establish and maintain an adequate and effective risk management system along the following core principles:

- Clear responsibilities;
- Implementation of relevant policies internally and towards own suppliers;
- systematic - in particular annual - risk analyses of their business and their direct suppliers;
- ad hoc risk analyses in case of business changes or upon notice of violations;
- remedial actions, where required;

In return, Our Partners can expect the Brückner Group to abide by and actively conduct business according to applicable laws, our internal guidelines and in particular in compliance with our own Code of Conduct.

#### 3.1 Direct Implications on the Business of Our Partners

Human rights and environmental practices as outlined above must be fully adhered to within Our Partners' own business operations.

#### 3.2 Implications Upstream the Supply Chain

Human rights and environmental protection must not only be ensured in Our Partner's own business operations but shall also be extended to their direct and - to the extent possible - also indirect business partners. We therefore expect that Our Partners perform due diligence on existing and new suppliers with regards to the requirements described by this code.

## 4. Monitoring

We reserve our right to validate Our Partner's business practices in particular in the form of questionnaires, risk assessments or audits. Furthermore, the Brückner Group reserves the right to monitor Our Partners and new candidates for compliance with the principles described herein on a regular or ad hoc basis or to outsource monitoring to a specialized, independent organization. The Brückner Group will address cases of non-compliance with appropriate actions. This may include working together to resolve non-compliance within an appropriate time, provided that the conduct of the business partner indicates a true desire to remediate non-compliance. Any internal or external party may confidentially or anonymously raise our attention to suspected unlawful conduct or behavior, which may not be in line with Our Rules via our whistleblowing hotline, which can be found on our website.

## 5. Consequences of Non-Compliance

We are committed to work with Our Partners on remedial actions by providing required education and training of Our Rules to Our Partners. However, if one of Our Partners shows continuously insufficient commitment to cease severe and/or willful non-conformity with Our Rules or fails to remediate this, the Brückner Group reserves the right to discontinue such business relationship.