



Supplier Code of Conduct

Corporate responsibility in the supply chain

To manufacture our products, we source raw materials and goods from all over the world and make use of global services. As a family-run company with over 250 years of tradition, the von Eicken Group is particularly committed to its social responsibility for respecting human rights and protecting the environment.

We base our business activities on internationally recognised frameworks and standards as well as national laws. We are aware that ensuring and promoting a responsible product supply chain and adhering to corporate due diligence requirements along this supply chain are dynamic processes. In the Policy Statement on Respect for Human Rights and Environmental Concerns, the companies of the von Eicken Group have committed themselves to a set of minimum standards.

A sense of responsibility and sustainability concerns also play an important role in the procurement processes of the von Eicken Group. In addition to economic, technical and procedural aspects, the decision to award a contract also takes into account social, environmental and ethical criteria.

Based on the standards and principles recognised in our Policy Statement, we have also formulated the sustainability-related expectations we place on our contractual suppliers (including their entities, employees, representatives, sub-contractors and contract partners (hereinafter collectively referred to as “Suppliers”), which we have set out in this Supplier Code of Conduct (SCoC).

We also expect our contractual suppliers to adhere to the highest human rights and environmental standards as well as to comply with applicable regulations. Our suppliers should ensure responsible working practices and consistently strive to promote sustainability matters, for example by improving working conditions, strengthening the protection of human rights, using resources more sparingly and fostering climate-friendly products and processes. The focus of these efforts is not only on the company’s own business area, but also explicitly on the entire upstream supply chain.

The principles and expectations set out in this document constitute a non-negotiable minimum standard that suppliers must respect and comply with in all business transactions with companies of the von Eicken Group.

Principles and requirements in a supplier's own business area and in their supply chains

1. General requirements

- Compliance with all applicable laws, rules and regulations of the countries in which suppliers operate or are located. This explicitly includes applicable occupational health and safety regulations, energy and environmental standards and anti-corruption rules.
- Respect for the principles and conventions defined by the United Nations, in particular the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights, the Conventions on the Rights of the Child and the Elimination of All Forms of Discrimination against Women, and the Recommendations of the International Labour Organization (ILO) on labour and social standards.
- Compliance with the Paris Agreement, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal and the Stockholm Convention on Persistent Organic Pollutants.
- Compliance with the anti-corruption principles defined by the Organisation for Economic Co-operation and Development (OECD).

2. Human and labour rights

- Child labour: All forms of child labour are prohibited. When employing young workers, suppliers shall ensure that their work does not adversely affect the safety, health, development and morale of the young workers.
- Forced labour: All forms of forced labour and all involvement in human trafficking are prohibited. When using employment agencies, suppliers may only use certified agencies.
- Discrimination: Any form of discrimination based on characteristics such as gender, skin colour, religion, nationality, political or other world view, ethnic origin, disability, age, sexual orientation or identity is prohibited. In particular, equal opportunities and equal treatment must be guaranteed in day-to-day operations, promotion decisions and the granting of training and professional development opportunities.
- Freedom to form associations: The rights to form employee representation and to conduct collective bargaining must be guaranteed.
- Remuneration and working hours: The rules on working time, remuneration arrangements, the minimum wage and social benefits must be observed in accordance with applicable national legislation.
- Personal rights and freedom of expression: Personal rights and the right to freedom of expression must be guaranteed.
- Occupational health and safety: The health of employees is ensured by appropriate occupational health and safety management, in particular by providing suitable workstations, work equipment and, where necessary, protective equipment.

3. Environmental issues and climate protection

- Protection of human rights: Harmful changes to the environment and contamination that are likely to endanger the natural basis of life are prohibited.
- Environmental permits: Environmental permits required for the activity concerned must be obtained by the supplier, kept up to date and complied with.
- Resources: The careful use of resources (especially raw materials, energy and water) must be ensured through efficient and responsible practices. Technologies should be used to avoid and reduce waste, waste water and hazardous substance pollution and to promote the reuse of raw materials.
- Greenhouse gas emissions: Compliance with the Paris Agreement must be ensured through measures to reduce direct and indirect CO₂ emissions and increase the use of renewable energy and alternative energy sources.
- Hazardous substances and product safety: The legally compliant labelling of hazardous materials, chemicals and substances, as well as their safe storage, handling and reuse, must be ensured.

4. Business integrity

- Corruption and bribery: Any form of corruption and bribery in business dealings with the suppliers' own suppliers or with the von Eicken Group is prohibited.
- Conflicts of interest: Business-related decisions must be made solely on the basis of objective criteria. Conflicts of interest with private matters, business or other activities must be avoided.
- Free competition: Compliance with applicable competition and anti-money laundering laws must be ensured. Employees must not participate in cartel agreements or money laundering activities, nor may they abuse a dominant market position.
- Information security: The comprehensive protection of personal data and business-related data of the von Eicken Group must be ensured by appropriate and effective IT systems.
- Foreign trade law: Compliance with export control and embargo regulations must be ensured. Business relationships may not be maintained with sanctioned persons, companies or organisations.
- Supply chain completeness: Suppliers must guarantee the complete traceability of the goods supplied by them to companies of the von Eicken Group and of the persons, companies or organisations involved in the upstream supply chain.

Adhering to and verifying our expectations

1. Compliance with the SCoC and reporting

The supplier undertakes that it will address the provisions of this Supplier Code of Conduct in an appropriate manner within its own company and along the upstream supply chain and enforce them by means of suitable contractual provisions.

If the supplier determines that a breach of the expectations formulated in this SCoC has already occurred or is imminent, it shall immediately take all necessary steps to end or prevent the breach as quickly as possible or to reduce the extent of the breach to a minimum.

The von Eicken Group has implemented a reporting system that is also made available to suppliers and their employees. Potential breaches of the expectations formulated in this SCoC can be reported to this independent body not subject to instructions – including anonymously if desired. You may find access to our whistle blowing system here:

https://www.von-eicken.com/en/whistle_blowing_contact_form

All breaches of the SCoC detected by the supplier must also be reported to this body immediately.

2. Verification

Regular evaluation is an integral part of our sustainability-related risk management system. As part of this process, we also analyse the von Eicken Group's supplier base to determine whether and which potential sustainability risks exist at their companies and then take measures to mitigate and eliminate identified risks.

This analysis also covers implementation of this SCoC. The von Eicken Group therefore reserves the right to verify compliance with the expectations set out in this SCoC by means of suitable measures, such as questionnaires and audits. The supplier undertakes to cooperate and shall provide all necessary information and requested documents if asked to do so. The von Eicken Group shall handle the information in such a way as to safeguard the supplier's business secrets and in accordance with data protection regulations.

In the event of suspected non-compliance with these principles and requirements, the von Eicken Group is entitled to set the supplier a reasonable deadline to remedy the breach.

If a supplier fails to comply with the requirements of the SCoC or in the event of a serious or repeated breach of the expectations formulated therein, the von Eicken Group reserves the right to terminate the business relationship without notice.

Lübeck, May 2024



The Supplier Code of Conduct of the von Eicken Group has been acknowledged and its contents and conditions are accepted in full.

Name of the company

Address of the company

First name and surname

Position of the signatory

Location, date, signature, company stamp