

## Supplier Code of Conduct

### 1. The foundation: Compliance with laws and conventions

Fackelmann respects applicable laws, and places a premium on economic, social, and ecological sustainability. The company expects the same from its business partners ("suppliers"), their employees, and the entire supply chain.

This is the case regardless of whether the laws, regulations, conventions, or other specifications (referred to in the following as "laws") are domestic, foreign, or international. The same applies to laws regarding health, human rights, security, the environment, competition, customs duties, or individual or collective labour law, etc. Under the law, encouraging third parties to take illegal actions or participating in such actions is strictly prohibited.

### 2. Separation of private and corporate interests

Fackelmann's employees are obligated to make their business-related decisions in the best interest of the Fackelmann company, without being influenced by personal interests. Therefore, suppliers may not attempt to influence the personal interests of Fackelmann employees. When making a decision on whether to enter into a business relationship, Fackelmann is guided only by objective criteria: in general, suppliers are only selected based on professional and objective criteria, in particular price, quality, and the existence of a quality management system, reliability, technological standards, product suitability, and a long-lasting business relationship which is free from conflict. In no case may personal relationships or interests influence the conclusion of a contract. Suppliers must disclose existing and potential conflicts of interest.

### 3. No violation of anti-corruption laws

Strict regulations apply worldwide under international conventions which are designed to fight corruption by officials and public administration employees and in business transactions, meaning that even corrupt activities carried out abroad (fraud and taking bribes) are punishable under domestic law. Suppliers must observe these regulations accordingly.

Suppliers must also note that Fackelmann employees are not entitled to request illegitimate personal advantages in conjunction with their business activities nor accept such advantages; therefore, suppliers may not offer such advantages. Only customary promotional gifts of low value designed for business-related use are permitted. Invitations (to business lunches, etc.) for a business-related purpose which are reasonable in scope and which are not capable of influencing business decisions in a dishonest manner are permitted in consideration of applicable record-keeping obligations under anti-corruption laws.

### 4. Protection of trade secrets

Suppliers will receive confidential information from Fackelmann for the purpose of negotiations, offers, and for carrying out contracts later on. Therefore, suppliers are obligated to maintain secrecy regarding all trade and company secrets belonging to Fackelmann. Both information designated as confidential and information which is assumed to be of a non-public nature and which should not be publicized (for instance because it would be beneficial to competitors or could harm Fackelmann or other business partners were it disclosed) is considered confidential. The non-disclosure obligation starts when inquiry documents are received, and continues during the contractual relationship as well as after that relationship ends.

Confidential and sensitive information of all kinds must be protected against unauthorised access by third parties. Suppliers must ensure internally that confidential information is disclosed only to employees who

require the information to carry out their duties, and who are obligated accordingly to maintain confidentiality. It must be ensured that this information is stored securely at all times, for instance through technical means.

## 5. Data protection

Protecting all of the personal data of our employees, customers, and business partners is highly important to us. Collecting, storing, or processing this data is permitted only if this is necessary for defined, clear, and legally permitted purposes.

## 6. Social responsibility

Fackelmann expects that its suppliers comply with internationally recognised human rights, in compliance with applicable laws.

Suppliers must ensure that:

- No form of forced or convict labour is practised.
- There is no rough or inhumane treatment in the workplace, in particular sexual harassment, corporal punishment or mental/physical abuse and verbal harassment of employees.
- No child labour is practised in the sense of ILO conventions or applicable national laws.
- Employees are never discriminated against.
- Freedom of association and effective recognition of the right to collective negotiations are ensured.
- Laws on work time are complied with.
- A safe work environment is ensured, in particular in relation to fire protection and emergency services.
- All laws, regulations, and national standards on wages and working hours, as well as regulated rest days and continued wage payments during annual vacation, are complied with.
- Complete records are kept on working conditions (environmental practices, employee safety, health, wages, and time recording).

## 7. Environmental protection

Fackelmann strives to use environmental resources as carefully as possible, avoid harm to people and the environment, and continuously improve all of its processes and procedures with the goal of further reducing environmental impacts.

Fackelmann expects that its suppliers:

- Comply with environmental protection laws and regulations.
- Observe all hazardous materials regulations (in particular on storage and disposal of such materials).
- Fulfil the requirements of waste legislation and legislation on emissions prevention and water conservation.
- Avoid or at least reduce environmental impacts insofar as this is possible through reasonable means.

## 8. Suspected violations

If suppliers suspect that these principles of conduct are being violated through their own actions, or through the actions of their employees or Fackelmann's employees, then Fackelmann expects to be informed of this suspicion promptly. Suppliers may report violations either to their contact person at Fackelmann, their supervisor, or the Compliance Officer ([compliance@fackelmann.de](mailto:compliance@fackelmann.de)). If suppliers believe that this notification may result in disadvantages for them, then they can request that the potential violation be initially investigated confidentially when notifying the Compliance Officer.

## 9. Complying with the Code of Conduct

Suppliers must work to ensure that their preliminary suppliers also comply with the standards defined here. Suppliers must inform them of the content of the Code of Conduct and require that they comply with the stipulations and standards set forth here.