

# Supplier Code of Conduct

## Preamble

This Supplier Code of Conduct ("SCoC") sets out the compliance requirements that all suppliers, service providers, and other business partners (hereinafter "Suppliers") of the Hödlmayr International Group (hereinafter "Hödlmayr") must adhere to. Hödlmayr itself is committed to taking ethical, social, and environmental responsibility in all aspects of its business activities and expects the same from its Suppliers. The guidelines and principles of Hödlmayr's own responsible and sustainable economic actions can be found in the Code of Conduct (CoC), which is also accessible on Hödlmayr's website. By signing this code, Suppliers confirm that they comply with the standards and regulations listed below and continuously strive to improve their business practices.

## 1. Compliance with Laws

Suppliers commit to complying with all applicable laws, regulations, and industry standards, particularly the international regulations in force concerning sustainability, "ESG" obligations, and supply chain due diligence.

## 2. Climate and Environmental Protection

Suppliers must take measures to avoid negative climate and environmental impacts of their business activities, including reducing greenhouse gas emissions and promoting the sustainable use of resources. The following measures should be specifically observed and implemented by the Supplier, where applicable:

- Climate change and emission reduction: Measures to reduce CO<sub>2</sub> emissions and climate impact.
- Energy efficiency: Use of renewable energy, reduction of energy consumption.
- Resource management: Responsible handling of raw materials and environmentally friendly waste treatment.
- Protection of biodiversity: Ensuring that production processes do not lead to the destruction of habitats.
- Compliance with environmental regulations: Compliance with all applicable regulations for environmental protection, such as air and water pollution limits.
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## 3. Social, Human Rights, and Working Conditions

Suppliers commit to respecting human rights and adhering to the following labor standards:

- Prohibition of child labor: No employment of persons under the age at which compulsory schooling ends according to the law of the place of employment.
- Prohibition of forced labor and slavery: No use of slavery, forced, or compulsory labor in any form.

## people in logistics

- Equal treatment: Discrimination based on age, disabilities, regional and ethnic origin, gender, political opinion or trade union activity, minorities (e.g., indigenous peoples), religion, or sexual orientation or other protected characteristics is strictly prohibited.
- Freedom of assembly and collective bargaining: The Supplier recognizes the right of all employees to freedom of assembly and collective bargaining and commits to fully respecting this right.
- Fair wages and working hours: Suppliers must comply with the applicable wage and working time regulations according to the law of the place of employment and ensure that employees receive fair wages for their work.
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## 4. Health and Safety at Work

Suppliers must ensure a safe and healthy working environment. This includes:

- Occupational safety measures that minimize health and safety hazards.
- Training and safety equipment for all employees to promote compliance with safety guidelines.

## 5. Governance and Integrity

Suppliers commit to a high level of integrity, particularly concerning:

- Corruption and bribery: Suppliers must not offer, grant, or accept bribes, inappropriate gifts, or other advantages to gain business advantages.
- Competition and antitrust law: Business agreements and other entrepreneurial actions that hinder free competition and constitute a violation of competition and antitrust regulations are not permitted.
- Conflicts of interest: Suppliers must disclose potential conflicts of interest that could jeopardize the integrity of their business relationship with Hödlmayr.
- Confidentiality and data protection: Trade and business secrets must always be kept confidential and secret. Personal data must be securely stored and may only be processed in accordance with applicable laws (EU GDPR, etc.).
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## 6. Own Supply Chain

Suppliers must ensure that their own suppliers and subcontractors also comply with the standards set out in this code. Suppliers are expected to implement an internal compliance and risk management system and conduct appropriate audits and controls in their supply chain to ensure compliance with this SCoC.

## Control and Reporting Obligations

Hödlmayr reserves the right to monitor compliance with the provisions of this code through regular reviews and – previously announced – personal audits. Suppliers will always cooperate and ensure that they provide relevant documents and information and take appropriate corrective measures if violations of this SCoC are identified by Hödlmayr. The Supplier is in any case obliged to report

serious compliance violations – regardless of whether they were committed only by them and/or their contractual partners who are part of the supply chain – to Hödlmayr immediately after becoming aware of them.

## 8. Sanctions for Non-Compliance

If a Supplier or an associated subcontractor seriously violates this SCoC, Hödlmayr reserves the right to take appropriate measures, including but not limited to:

- Immediate termination of the contractual relationship with the Supplier.
- Claims for damages in the event of violations of legal requirements or this code.

## 9. Confirmation

By confirming this SCoC, the Supplier agrees to comply with the standards set out in this document and to ensure that they are also applied throughout the supply chain.

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Place and Date

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Company Stamp and Supplier Signature