



## Foreword

Graepel is committed to its economic, ecological and social responsibility. As a responsible and successful company, we focus on offering our customers, employees, investors, dealers, suppliers and the cities and communities in which we operate real added value. In doing so, Graepel is guided at all times by fundamental social and ethical values.

## Scope of application

We require our suppliers and business partners (including business partners with an intermediary and/or representative function who act in the interest of or on behalf of Graepel in a sales-supporting capacity, such as consultants, agents, sales representatives, etc.) to acknowledge their economic, ecological and social responsibility. For future cooperation, the contractual partners agree that the following regulations for a joint code of conduct shall apply. This agreement shall form the basis for all future deliveries and transactions. Our business partners undertake to comply with the principles and requirements and to endeavor to contractually oblige their suppliers and subcontractors to comply with the standards and regulations set out in this document. Contractual partners also undertake to participate in audits.

This Code of Conduct is based on national and international laws and regulations, as well as the UN Universal Declaration of Human Rights, the UN Guiding Principles on the Rights of the Child and Business Conduct, the UN Guiding Principles on Business and Human Rights and the ILO Core Labor Standards.

## 1 Social responsibility

### Prohibition of child labor

Graepel's suppliers and business partners do not tolerate child labor at any stage of production. We expect them to comply with local laws and only employ workers who are of the minimum age required by local law. If the locally applicable laws do not contain corresponding regulations, suppliers and business partners undertake not to employ children under the age of 14. In the event of non-compliance, the measures to be taken to remedy the situation and enable children to attend school must be documented. The rights of young workers must be protected and special protective regulations must be complied with.

### Exclusion of forced labor

No forced labor, slave labor or work of a similar nature may be used. All work must be voluntary and employees must be able to terminate the work or employment relationship at any time. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment.

### Ethical recruitment

Suppliers and business partners shall ensure that, at the time of recruitment, business partners' employees are provided with a contract that complies with applicable law and is in a sufficiently documented form (e.g. written or electronic), in a language they understand and which truthfully and clearly sets out their rights and obligations. In addition, business partners shall not mislead or deceive prospective employees about the nature of the work, require employees to pay recruitment fees or unreasonable transportation costs and/or confiscate, destroy, conceal and/or deny access to government-issued employee passports and other identification documents and/or restrict employees' freedom of movement or require employees to involuntarily use company-provided accommodations without a business reason.

### Fair compensation

Our suppliers and business partners are required to pay employees a fair wage directly, in full and on time. A fair wage is at least the minimum wage established by applicable law and is otherwise determined by the law of the place of employment. This wage should at least cover the basic needs of the employees and allow the employees and their families a decent standard of living (living wage).

### Working hours

Our suppliers and business partners must ensure that working hours comply with the applicable national, state and local laws and/or the national requirements applicable in the respective industry. In any case, working hours must comply with the ILO standards for working hours.



## **Prohibition of discrimination**

Discrimination against employees is not permitted. Suppliers and business partners of Graepel do not discriminate against anyone on the basis of ethnic, national or social origin, skin color, gender, religion, ideology, age, disability, sexual orientation, political views or other characteristics protected by law. The personal dignity, privacy and personal rights of each individual are respected.

## **Equal opportunities and equal treatment**

Suppliers and business partners must ensure equal opportunities for all employees in all aspects of selection, training and development. Inclusion should also be promoted in everyday working life. Recruitment should be free from discrimination and bias.

## **Employee representation and freedom of association**

We expect our suppliers and business partners to recognize the fundamental right of all employees to form and join trade unions and employee representative bodies. Where this right is restricted by local laws, alternative, legally compliant means of employee representation should be promoted. Employee representatives must be protected from discrimination. They must be granted free access to the workplaces of their colleagues.

## **Health and safety in the workplace**

Our suppliers and business partners ensure a safe working environment by setting up and applying appropriate occupational safety systems in which accident prevention is promoted and the risk of damage to health is minimized. We expect suppliers and business partners to comply with all locally applicable health and safety laws and regulations. Employees are provided with access to sufficient quantities of drinking water and access to clean sanitary facilities.

## **Product safety**

Our suppliers and business partners comply with all applicable legal regulations and requirements for product safety, in particular the legal requirements for the safety, labeling and packaging of products and the use of hazardous substances and materials.

## **Dealing with conflict materials**

Graepel's suppliers and business partners must fulfill their duty of care to maintain a responsible supply chain for raw materials (e.g. tin, tantalum, tungsten, gold, cobalt). This includes improving transparency within its own supply chain through to the extraction of raw materials and introducing suitable measures to reduce the risks of human rights violations and the direct or indirect financing of armed groups. Suppliers and business partners must avoid using raw materials that originate from smelters or refineries that do not meet the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Information about the smelters or refineries used by the supplier or sub-supplier must be provided to Graepel on request.

## **Land, forest and water rights and forced evictions**

Our suppliers and business partners are committed to the protection of land, forest and water whose use secures the livelihood of local people and recognize the right of the local population to use land, forest and water as a livelihood. Suppliers and business partners reject all forms of expropriation and forced eviction.

## **Use of private or public security forces**

The use of private or public security forces to protect business projects is prohibited. They may only be deployed if it is guaranteed that they comply with the prohibition of torture and cruel, inhuman or degrading treatment, do not harm life and limb and do not impair freedom of association through their deployment.

## **Grievance mechanisms**

Suppliers and business partners shall establish an effective grievance mechanism at company level for individuals and communities that may be affected by adverse impacts.



## 1 Environment and climate protection

### **Compliance with legal requirements and creation and application of environmental management systems**

We expect our suppliers and business partners to protect the environment and to comply with all applicable environmental laws and regulations of the countries in which they operate. Graepel's suppliers and business partners should continuously improve their environmental performance. Business partners with their own production sites introduce suitable environmental management systems (e.g. in accordance with ISO 14001 or the EMAS Regulation of the European Union).

### **Raw material and resource efficiency**

Our suppliers and business partners use raw materials and natural resources sparingly and minimize the environmental impact of their production processes and products.

### **Waste and hazardous substances**

Graepel's suppliers and business partners follow a systematic approach to identify, handle, reduce and dispose of or recycle waste. The handling of hazardous substances must be carried out in such a way that safety is ensured when handling these substances.

### **Energy and CO2 emissions**

Our suppliers and business partners should monitor and document their energy consumption and implement measures that contribute to reducing energy consumption and CO2 emissions. Suppliers and business partners should draw up their own CO2 balance sheet.

### **Water and air**

All waste water, air and noise emissions are to be typified, monitored and checked by our business partners and suppliers. Measures to reduce waste water, air and noise emissions should also be introduced.

## 1 Ethical business conduct

### **Avoidance of conflicts of interest, prohibition of corruption, improper payments, fringe benefits and handling of gifts**

Graepel does not tolerate corruption. Our suppliers and business partners shall ensure that their employees, subcontractors or agents do not give, offer or accept bribes, kickbacks, improper donations or other improper payments or benefits to or from customers, public officials or other third parties. Bribes, gratuities and similar payments to public officials, Graepel employees or agents acting on Graepel's behalf are strictly prohibited. This prohibition also applies in regions where such actions do not violate applicable laws. We expect our suppliers and business partners to provide us with consistently good performance.

### **Free and fair competition**

Our suppliers and business partners comply with the applicable antitrust laws. They do not enter into any anti-competitive agreements with competitors, suppliers or customers and do not abuse any dominant market position they may have.

### **Export control, export controls and economic sanctions**

Graepel's suppliers and business partners comply with all applicable laws governing the import and export of goods, services and information. They respect international regulations and do not conduct transactions or business with goods or technologies that are subject to restrictions such as embargoes or economic sanctions.

### **Money laundering**

Suppliers and business partners of Graepel only maintain business relationships with business partners whose integrity they are convinced of. They ensure that the applicable legal provisions against money laundering are not violated.

### **Business information**

Our suppliers and business partners publish business data and reports on their business activities truthfully and in accordance with the applicable laws.



## **Confidentiality/data protection**

Our suppliers and business partners are committed to meeting the reasonable expectations of clients, suppliers, customers, consumers and employees regarding the protection of private information. We expect suppliers and business partners to comply with all applicable laws and regulations regarding the collection, storage, processing, transfer and disclosure of internal, confidential and personal information.

## **Intellectual Property**

Graepel's suppliers and business partners shall respect Graepel's and third parties' know-how, patents, trade and business secrets. They shall not disclose such information to third parties without prior express written consent or in any other unauthorized manner. In addition, they undertake not to use or offer any plagiarized, imitation or counterfeit products in the manufacture and supply of goods and services.

## **Dealing with company assets**

We expect our suppliers and business partners to respect Graepel's tangible and intangible assets and not to use them for improper or non-company purposes. They must ensure that their employees and any third parties they use in the course of the business relationship (such as subcontractors or agents) neither damage Graepel's assets nor use them improperly, i.e. contrary to Graepel's interests.

## **Security of the international supply chain**

Our suppliers and business partners must ensure that the operating sites and transshipment locations where production, storage, processing, loading and transport takes place are protected against unauthorized access by third parties as part of a secure supply chain and that the personnel employed are reliable.

## **1 Legal consequences of violations of this Code of Conduct**

If a supplier or business partner of Graepel violates this Code of Conduct, we are entitled to terminate the business relationship with this supplier or business partner by extraordinary termination. It is at our discretion to waive such consequences and instead take alternative measures if the supplier or business partner can credibly assure and prove that it has immediately initiated countermeasures to prevent future violations.

**We hereby confirm that we have read and understood the Code of Conduct and will fully comply with it in accordance with our business relationships.**

(For reasons of better readability, the simultaneous use of the language forms male, female and diverse (m/f/d) is dispensed with. We understand the generic masculine as a neutral grammatical expression which - unless otherwise indicated - expressly includes all genders).