

CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS OF THE GRAEPEL GROUP



(For reasons of better readability, the simultaneous use of male, female and diverse (m/f/d) is dispensed within this Code of Conduct. We regard the generic masculine as a neutral grammatical expression which - unless otherwise specified - expressly includes all genders.)

Graepel has been a responsible and successful company since it was founded in 1889, focusing on offering its customers, employees, investors, dealers, suppliers, as well as the cities and communities in which Graepel operates, genuine added value. In doing so, Graepel is always oriented towards the basic social and ethical values and offers service that persists.

We are extending our commitment to these values - integrity, quality and social responsibility - to our multi-layered and global suppliers: All Graepel suppliers are expected to adhere to this Code of Conduct in order to ensure that they too work with integrity and in a socially responsible and environmentally friendly manner.

The following requirements apply to all business relationships between the companies of the Graepel Group and their business partners.

General responsibility

Following the principle of sustainability, we are aware of our responsibility for the economic, ecological and social effects of our actions. We also demand this from our business partners, especially with regard to human rights, occupational safety and health, environmental protection and the fight against corruption. Suppliers are expected to be familiar with the business practices of their suppliers and subcontractors and to ensure that they also operate in accordance with the Code.

We expect that our suppliers and business partners will take all necessary measures to implement this Code. Failure to comply with this Code could result in the termination of business relationships.

1. Transparent business relationships

Openness and transparency are the key to credibility and trust in business dealings. The Graepel Group expects its suppliers and business partners to observe the following practices in particular:

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

Staff members, suppliers and business partners of the Graepel Group make their decisions exclusively on the basis of objective criteria and are not influenced by personal interests and relationships. The Graepel Group does not tolerate corruption. Our suppliers and business partners ensure that their employees, subcontractors or representatives do not grant, offer or accept any bribes, kickbacks, improper donations or other improper payments or benefits towards customers, public officials or other third parties. Bribery, monetary benefits and similar payments to civil servants, Graepel employees or representatives acting on behalf of Graepel are strictly prohibited. This prohibition also applies in regions where such actions do not violate applicable laws.

We expect our suppliers and partners to serve us with consistent good performance.

CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS OF THE GRAEPEL GROUP



2. Human rights

The principles of human rights according to the United Nations are an essential basis of our corporate culture. The Graepel Group also expects this from its suppliers and business partners:

2.1 Child Labor and Slavery

Suppliers and business partners of the Graepel Group reject child labor and forced labor or their use. Suppliers are expected to comply with local laws and only employ people who are of the local minimum age. If the locally applicable laws do not contain appropriate regulations, the suppliers agree not to employ children under the age of 14. The Graepel Group does not buy any goods or services from suppliers who use forced or involuntary labor.

2.2 Equal opportunity and equal treatment

Graepel's suppliers and business partners do not discriminate against anyone on the basis of ethnic, national or social origin, skin color, gender, religion, worldview, age, disability, sexual orientation, political attitude, insofar as this is based on democratic principles and tolerance towards those who think differently, or other legally protected characteristics unless this is contrary to mandatory law.

2.3 Employee representation and freedom of assembly

The fundamental right of all employees to form trade unions and employee representatives and to join them is recognized. Where this right is restricted by local laws, alternative, legally compliant options for a staff representation should be promoted.

2.4 Remuneration and Working Hours

The Graepel Group pays its staff members competitive salaries. Suppliers are expected to comply with all applicable laws and regulations regarding the remuneration and working hours of their staff members.

If there are no legal or collective bargaining provisions, the remuneration is based on the industry-specific, customary locally agreed remuneration and benefits, which ensure an adequate standard of living for the staff and their families.

The working hours correspond at least to the respective national legal requirements or the minimum standards of the respective national economic sectors.

2.5 Workplace health and safety

Graepel is committed to the health and safety of its staff members and ensures that all locally applicable laws and regulations are abided by.. Suppliers are expected to provide a safe work environment that promotes accident prevention and minimizes the risk of damage to health. Suppliers and business partners are expected to comply with all local laws and regulations relating to health and safety.

CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS OF THE GRAEPEL GROUP



3. Environmental and climate protection

The Graepel Group supports methods to promote environmental and climate protection. Graepel expects suppliers and business partners to adhere to the following basic principles:

3.1 Compliance with statutory requirements

Graepel respects the environment and complies with the applicable laws and regulations. Suppliers are expected to protect the environment and comply with all applicable environmental laws and regulations in the countries in which they operate.

3.2 Increasing energy and resource efficiency

Suppliers and business partners use natural resources sparingly and minimize environmental pollution in their production processes and products. They make a contribution to reducing energy consumption and CO2 emissions.

3.3 Establishment and use of environmental management systems

Suppliers and business partners of the Graepel Group continuously improve their environmental performance. Business partners with their own production sites introduce suitable environmental management systems for this purpose (for example in accordance with ISO 14001 or EMAS regulation of the European Union).

4. Fair market practice

The Graepel Group is a fair and responsible competitor and adheres to contractual obligations. This is also expected of suppliers and business partners.

4.1 Free competition

Suppliers and business partners of the Graepel Group adhere to the applicable antitrust laws. They do not enter into any anti-competitive agreements with competitors, suppliers or customers and they do not abuse any dominant market position.

4.2 Export Control

Suppliers and business partners of the Graepel Group comply with all applicable laws for the import and export of goods, services and information.

4.3 Money laundering

Suppliers and business partners of the Graepel Group only maintain business relationships with those business partners who have demonstrated integrity. They ensure that the applicable statutory provisions against money laundering are not violated.

4.4 Business Information

Suppliers and business partners of the Graepel Group publish business data and report on their business activities truthfully and within the framework of the applicable laws.

4.5 Product safety

Suppliers and business partners of the Graepel Group observe all applicable product safety regulations and requirements, in particular the statutory requirements relating to the safety, labeling and packaging of products as well as the use of hazardous substances and materials.

CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS OF THE GRAEPEL GROUP



5. Protection of data, trade secrets and company assets

Confidential data, trade secrets and company assets must be protected. The Graepel Group expects suppliers and business partners to adhere to the following basic principles:

5.1 Data protection

Suppliers and business partners are expected to comply with all applicable laws and regulations regarding the protection, use and disclosure of Graepel's internal, confidential, and personal data.

5.2 Protection of know-how, patents, company and trade secrets

Suppliers and business partners of the Graepel Group respect the know-how, patents, trade and business secrets of the Graepel Group and those of third parties. They will not pass on such information to third parties without prior express written consent.

5.3 Handling of corporate assets

Suppliers and business partners of the Graepel Group respect the tangible and intangible assets of the Graepel Group and do not use them for unfair or non-business purposes. They ensure that their staff members as well as any third parties employed by them in the context of the business relationship (such as subcontractors or representatives) neither damage nor misuse the assets of the Graepel Group - i. e. contrary to the interests of the Graepel Group.

5.4 Security of the international supply chain

Suppliers and business partners of the Graepel Group must ensure that the operating facilities and transshipment locations at which production, storage, handling or processing, loading and transport is carried out are protected against unauthorized access by third parties within the framework of a secure supply chain and that the staff employed is reliable.

6. Legal consequences of violations of the Graepel Group's Code of Conduct for suppliers and business partners

If a supplier or business partner of the Graepel Group violates this Code of Conduct, the Graepel Group reserves the right to terminate the business relationship with the supplier or business partner by giving notice of termination.

It is at the discretion of the Graepel Group to forego such consequences and instead to take alternative measures if the supplier or business partner can credibly confirm and demonstrate that it has promptly taken countermeasures to avoid future violations.

CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS OF THE GRAEPEL GROUP



Contact person

The Code of Conduct for Graepel suppliers is based on the Graepel company guidelines, which, as this Code of Conduct, can be accessed at the following web address:
<http://www.graepel.de>

Changes to the Code of Conduct for Graepel suppliers will also be published on the aforementioned website.

For questions or comments regarding the Code of Conduct for Graepel suppliers, please contact your respective supply chain contact. (e-mail address: josias.arndt@graepel.de)

Reporting Violations

Violations of the Code of Conduct for Graepel suppliers are to be reported in one of the following ways. Reports are treated confidentially.

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