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## Code of Conduct

### For Suppliers of ZAUNERGROUP

This **Code of Conduct** defines the fundamentals and requirements of **ZAUNERGROUP** with respect to its suppliers of goods and services concerning their responsibility for human beings and the environment. In case of adequate changes of the ZAUNERGROUP compliance program, ZAUNERGROUP reserves the right to change the requirements of this Code of Conduct. ZAUNERGROUP expects the acceptance of such changes by its suppliers.

The supplier agrees to adhere:

#### Compliance with all applicable laws and regulations

- To the laws and regulations of the respectively valid legal systems must be observed.

#### Prohibition of corruption and bribery

- No form of prohibition or bribery may be tolerated or engaged in, including any kind of illegally promised advantages or similar grants to decision makers which are capable for affecting the decision-making.

#### Compliance with the rules of free and fair competition

- To the principles of free and fair competition as the fundamental basis of a functioning market economy and to strictly adhere to the laws that protect functioning competition.

#### Prohibition of money laundering

- Only enter into transactions with reputable companies whose funds originate from legal sources. If there are any doubts about the seriousness of a company, a check is carried out before entering into a contractual relationship.

#### Respect for fundamental rights and ensuring fair working conditions for employees


- The equality of opportunities as well as the equal treatment of the employees, independent of skin colour, race, nationality, social origin, disability, sexual orientation or identity, political or religious belief, pregnancy, culture, sex, family status or age must be supported and any form of discrimination must be prevented.
- The personal dignity, privacy and personal rights have to be respected.
- Nobody may be engaged against his or her wishes or forced to work.
- Unacceptable treatment of employees must not be tolerated e.g. mental cruelty, sexual or private harassment or discrimination.
- Behaviour (incl. gestures, language and physical contacts) which is sexual, compulsory, threatening, abusive or exploiting must not be tolerated.
- Employees must be remunerated adequately and the legally defined national minimum wage must be ensured.
- The respectively defined maximum working hours must be held.
- As legally valid, the employees' freedom of association must be accepted and members of trade members must neither be privileged nor unprivileged.
- Comply with all labour and social law provisions and standards without exception.

#### Prohibition of child labour/human trafficking/modern slavery

- Employees that are younger than 15 years must not be employed. In states which are included in the developing countries-exception of ILO convention 138, the minimum age of workers may be reduced to 14.
- To firmly reject all forms of modern slavery and human trafficking.

Created: Christine Schindlinger (QM) (3/21/2024)	Checked: Theresa Reisinger (Head of Legal) (3/25/2024), Thomas Fritzges (Einkauf) (3/21/2024)	Approved: Johannes Maxwald (Operations) (3/25/2024)
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#### Health and safety of the employees

- Responsibility for health and safety of the employees must be assumed.
- To contain risks and take effective precautionary measures against accidents and occupational illnesses.
- Provide appropriate training and ensure that all employees are fully informed and instructed on the subject of occupational safety.
- Establish and apply an occupational safety management system (e.g. ISO 45001).

#### Environmental protection

- Environmental protection in consideration of the laws and international standards has to be adhered.
- Environmental impacts have to be minimized and environmental protection has to be continuously improved.
- To set up and apply an environmental management system (e.g. ISO 14001).

#### Data Protection

- To ensure that the processing and use of personal data is carried out in compliance with the applicable data protection regulations.

#### Supply chain

- To ensure the best possible compliance with the contents of the Code of Conduct along the supply chain at its suppliers
- The principles of non-discrimination by choosing and handling the suppliers must be maintained.

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## Code of Conduct

### For Suppliers of ZAUNERGROUP

#### Declaration of the supplier:

#### Hereby we confirm:

1. We are aware of ZAUNERGROUP's Code of Conduct<sup>i</sup> (hereafter "Code of Conduct") and will comply with the principles and requirements of this Code of Conduct in addition to the terms and conditions of the contracts with ZAUNERGROUP.
2. We will respond with a written self-assessment if requested by ZAUNERGROUP in the requested form and in a reasonable period of time.
3. ZAUNERGROUP reserves the right to carry out audits by authorised representatives at any time for the purpose of controlling the compliance with the Code of Conduct.
4. We strive to pass the content of this Code of Conduct on to our suppliers and to assure them of the adherence of its principles and requirements.

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Place, date

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Name, function (in printed letters)

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Signature

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Company stamp

This document has to be signed by a duly authorised representative of the company and must be forwarded to ZAUNERGROUP within 20 business days after upon receipt.

<sup>i</sup> You will find the full version of the ZAUNERGROUP Code of Conduct in the download area of our website:

<https://zaunergroup.com/en/downloads>

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