

# Business Partner Code of Conduct

(Code of Conduct for Suppliers and Subcontractors)



## **Preamble**

The Leadec Group (hereinafter referred to as “Leadec”) is a leading global service specialist along the entire life cycle of the factory and corresponding infrastructure.

Our suppliers and subcontractors (hereinafter referred to as “Business Partners”) make a significant contribution to Leadec’s success. Therefore, a common understanding of law-abiding, ethically correct and sustainable actions is important to us, and we see this as a prerequisite and basis for our cooperation. We follow the dictates of sustainability and bear responsibility for the economic, ecological and social effects of our actions. We expect this equally from our Business Partners, especially with regard to fair competition, occupational health and safety, human and women’s rights, equality, non-discrimination and harassment, respect for diversity, justice and inclusion as well as environmental protection and fighting corruption.

Sustainability requirements are based on national and international provisions and conventions, including the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the Conventions of the International Labor Organization (ILO) and the UN Guiding Principles on Business and Human Rights. The Leadec Group recommends its Business Partners to be certified according to or oriented towards the international standard ISO 14001.

Each of our Business Partners is responsible for conducting themselves at all times at least in accordance with the rules of this Code of Conduct, reviewing their own Code of Conduct, if applicable, to ensure that it at least meets Leadec’s requirements and bindingly implements the same or similar comparable standards along its supply chain.

## **Respect for free and fair competition**

The laws protecting free and fair competition shall be complied with at all times. The Business Partners respect a free market and open competition. The company’s intellectual property must be protected. Plagiarized products may not be circulated or acquired and must be reported to the management immediately. Theft of intellectual property from others is strictly prohibited. Violations of competition and antitrust laws, such as illegal agreements that restrict competition or the formation of illegal cartels, will not be tolerated by the Business Partners and will be consistently punished.

## **Combating bribery and corruption**

Our Business Partners know their financial responsibility and comply with all rules of proper and audit-proof accounting. No forms of bribery or corruption will be tolerated. All business activities of the Business Partners must be based on honest and responsible thinking and acting.

All agreements or for the granting of improper advantages or a punishable or unethical influence on business decisions of third parties are prohibited. This applies to both direct and indirect granting of advantages in favor of individual persons or organizations in connection with the procurement, awarding, approval, delivery, processing or payment of orders. This applies to all agreements of the Business Partners with business partners, their employees or public officials, but also to other third parties. The same applies to the granting of advantages in connection with official procedures.

## **Observance of embargoes and sanctions lists**

Many jurisdictions have enacted trade control laws and regulations that restrict or prohibit the cross-border transfer of goods, services and technology as well as certain cross-border capital transactions and payments. These may affect not only the export, but also the import of goods, services or technology from or to such countries. When exporting or importing goods, services or technologies, as well as in cross-border capital transactions and payments, the relevant legal provisions must be strictly observed.

The Business Partners always perform the legally required checks based on the currently valid sanctions lists. Trade or other business relations with natural or legal persons, groups or organizations that are listed in the currently valid sanctions lists of the EU and/or the USA are strictly prohibited.

## **Human rights**

The fundamental rights of people are to be respected by the Business Partners worldwide. This explicitly also applies to the rights of minorities and indigenous peoples. Any unlawful different treatment (discrimination) of persons will not be tolerated. The same applies to harassment or disparagement of persons. In particular, no discrimination on racial grounds or on the basis of ethnic origin, gender, religion or ideology, political views, physical or mental limitations, age or sexual identity will be tolerated.

## Working conditions

The employees of our Business Partners are recruited and employed ethically on the basis of fair and legally compliant working conditions. The formation of legitimate employee interest groups is not hindered and no form of forced or child labor is tolerated. When employing young workers, care is taken to ensure that they do not receive work that exceeds their physical or mental capacity or involves harmful exposure to hazardous substances. Legal minimum requirements apply to all employees; in particular, the legal maximum working hours are not exceeded and legal provisions on night work, rest periods, annual leave and breaks are observed.

In the absence of minimum standards or legal requirements, the ILO international standard of a maximum of 48 hours per week, with a break of at least 24 hours every seven days, should apply. Furthermore, according to the ILO, a maximum of 12 hours of overtime per week may be worked at times and in emergencies. They receive adequate remuneration that at least complies with the applicable laws. The health and safety of employees are respected and protected.

If, due to a lack of instruction or control by the company, the use of security staff could disregard the prohibition of torture and cruel, inhuman or degrading treatment, cause injury to life or limb, or interfere with the freedom of association and trade union freedom, the use of such security staff shall be prohibited.

## Occupational health and safety, environmental protection and sustainability

The protection of people and animals, of life, health, biodiversity and a responsible use of resources of all kinds (water, air, land, raw materials, energy ...), chemicals and pollutants are a matter of course. It is everyone's responsibility to avoid hazards for people in the workplace, to respect animal welfare, to minimize impacts on the environment (e.g., through the use of renewable energies, more environmentally friendly alternative solutions, biodegradable products) and to use resources sparingly. We expressly draw attention to the prohibition of unlawful eviction and deprivation of land, forests and waters in the acquisition, construction or other use of land, forests and waters, the use of which secures the livelihood of a person. Minimum land use shall be observed, and deforestation shall be avoided or compensated for. Any type of waste and emissions (noise, exhaust gases, greenhouse gases, etc.) must be kept to a minimum and regular evaluations must be made to determine whether emissions (especially those of carbon dioxide) can be reduced or avoided altogether. Likewise, it must be checked whether waste can be reused or recycled, and investments must be made in measures

that sustainably improve the company's energy efficiency. The principles of sustainability and environmental compatibility provide orientation. We require our Business Partners to set up a reporting system for greenhouse gas emissions that shows the individual shares caused by the commissioning through Leadec as well as measures for future reduction and/or compensation.

## **Data protection and information security**

Personal data, business documents, data carriers, and IT processing systems must always be protected against unauthorized access by third parties. Effective precautions against these risks are an important part of the Business Partners' IT management. Our Business Partners' IT security measures correspond to the current state of the art. Confidentiality agreements are also concluded.

## **Compliance with the principles of this Code of Conduct in the supply chain**

Business Partners are required to enforce compliance with the minimum standards set forth in this Code of Conduct with their own suppliers and subcontractors as well.

## **Reporting compliance violations/whistleblowing**

Leadec expects Business Partners to report their own and third-party violations of this Code of Conduct ("**compliance violations**") to Leadec. Various options are available for reporting indications of compliance violations on the following Leadec website: <https://www.leadec-services.com/de/die-leadec-gruppe/compliance>.

The Business Partners are obliged to actively clarify suspicious cases and to cooperate unconditionally. If there is reasonable suspicion of a violation of the Code of Conduct by a Business Partner or if, in case of suspicion, the Business Partner does not sufficiently comply with its obligation to clarify and cooperate, Leadec may terminate the business relationship with immediate effect on the basis of existing contractual or legal rights. Leadec reserves the right to take further legal steps, in particular claims for damages, in the event of a violation of the Code of Conduct.

## **Prevailing regulations**

The Business Partner Code of Conduct of the Leadec Group is published in various languages. In the event of discrepancies or contradictions between the different language versions, the

German version shall prevail. The current version can be found on the Internet at <https://www.leadec-services.com/the-leadec-group/compliance>.

## **Commitment of the Business Partner to this Code of Conduct**

We have received the Code of Conduct and hereby undertake, in addition to our other contractual obligations towards Leadec, to comply with the provisions of this Business Partner Code of Conduct.

## **BUSINESS PARTNER CoC ACCEPT / Signature for compliance**

**The undersigned authorized representative/s of the Business Partner hereby certify that the Business Partner accepts and complies with the Business Partner Code of Conduct.**

Organization / Full Company Name:

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NAME:

– printed name / block letters –

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Position / Job Title:

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Place:

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Date:

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Signature:

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Company Seal:

