

## Supplier Code of Conduct

### Introduction

The Siewert & Kau Technologies emphasises its commitment to ethics, integrity and compliance with the law. All employees\* of the Siewert & Kau Technologies must abide by the Code of Conduct, the corporate philosophy and the standards contained therein. Both customers and suppliers can expect these values to be lived by the Siewert & Kau Technologies. When selecting suppliers, the Siewert & Kau particular emphasis is on ensuring that these values are also adhered to and implemented along the respective supply chains.

The Code of Conduct for Siewert & Kau suppliers contains minimum requirements that must be accepted by all suppliers and confirmed by their declaration. Compliance with these principles and requirements is an essential contractual obligation for the supplier and an integral part of the business relationship between the Siewert & Kau Technologies and its suppliers.

### Principles

#### Compliance with the laws

Our suppliers must respect and comply with all relevant laws and regulations of the countries they operate in. This includes generally accepted customs, in particular, but not limited to, competition and antitrust rules and restrictions on the export or re-export of products, information, software and information technology. They must also comply with money laundering prevention measures and international sanctions regimes. They must also comply with international human rights law relevant to social standards and environmental legislation to which they are subject.

#### Working against bribery and corruption

The Siewert & Kau rejects bribery and corruption in any form. Our suppliers and their employees must act in such a manner that no personal dependence, obligation or influence arises or is given the appearance of arising. Our suppliers must make decisions based on the facts and must not be guided by personal or financial interests. The Siewert & Kau expects fair business conduct that complies with national and international regulations.

#### Data privacy and confidentiality

Our suppliers are obliged to protect and preserve the personal and confidential information they receive in the course of their business. They must also ensure that national and international data privacy and confidentiality regulations are complied with.

### Fundamental Rights / Social Responsibility

#### Prohibition of forced and compulsory labour

All forms of forced and compulsory labour are strictly prohibited, including any form of labour or service which is exacted, under penalty of punishment or other evil, from any person for which he has not offered himself voluntarily. This includes modern slavery, involuntary or exploitative prison labour, human trafficking or other forms of exploitation. Coercing workers into employment, either directly or indirectly through violence and/or intimidation, is prohibited. Verbal, psychological, sexual and/or

\* For reasons of improving readability, this document does not use the masculine and feminine forms of language simultaneously. The generic masculine is used, referring to both genders equally.

physical violence, coercion or harassment are also prohibited and will not be tolerated. We urge our suppliers and their supply chains to respect this.

### **Prohibition of disadvantage and discrimination**

It is not permitted to exclude, favour or discriminate against anyone on the basis of ethnic origin, position, health status, skin colour, gender, age, faith, political views, trade union membership, physical or mental disability, nationality, sexual orientation, pregnancy or other personal characteristics. To ensure that workers' freedom of association is respected, our suppliers undertake to ensure that members of workers' organisations or trade unions are neither favoured nor disadvantaged.

### **Reasonable working hours and remuneration**

Our suppliers are obliged to observe working hours (including overtime) in accordance with the applicable legal provisions, as well as to comply with the relevant industry standards or the relevant ILO conventions. They must ensure that the wages paid are at least equal to the legal/tariff minimum wage of the respective country. In the absence of legal or industry minimum wages, our suppliers must ensure that the wages paid cover the basic needs of the workers, taking into account other relevant factors such as part-time employment or additional earnings.

## **Child labour**

### **Protection of children and young people**

Using child labour at any stage of the production or handling process is strictly prohibited. Our suppliers undertake to comply with the minimum standards of the ILO Conventions on the minimum age for admission to employment and on the prohibition of child labour, and to take all necessary measures to ensure that no person below the legal minimum age is employed. The minimum age for admission to employment shall not be less than the age at which compulsory education ends and in no case less than 15 years of age. The respective national standards for the protection of children and young people in employment must be observed, but the exceptions of the relevant ILO Conventions apply. Exposing children and young persons who have not attained the age of 18 to activities which, by their nature or the circumstances in which they are carried out, are harmful to their health, safety or morals, is prohibited.

## **Health**

### **Guarantee of health and safety in the workplace**

Our suppliers must ensure that their employees work in a safe and healthy working environment. To prevent injuries and illnesses that may occur in the course of their work, our suppliers must take the necessary measures, such as supervision, management systems, protective equipment and emergency plans. These measures must, at the very least, comply with national regulations. Our suppliers should also constantly strive to improve their health and safety measures in the workplace.

### **Use of security guards**

If private or public security guards are used by our suppliers to protect the company's project, they must ensure that basic workers' rights are protected through training and supervision. This includes, in particular, the prohibition of torture, cruel, inhuman or degrading treatment or injury to life or limb.

### **Ensuring basic human needs**

Our suppliers must ensure that their operations do not have a negative impact on the environment, such as harmful changes to the soil, water or air pollution, harmful noise pollution or excessive water consumption that would affect the natural resources needed for food production. The health of

persons shall not be adversely affected, access to safe drinking water shall not be denied, and access to sanitation shall not be impeded or destroyed. Furthermore, the land, forests and waters that serve as the basis of people's livelihoods must not be unlawfully taken or forcibly cleared for use or cultivation for commercial purposes.

## Environmental protection and sustainability

### Reduction of energy consumption and emissions

Our suppliers are encouraged to take effective measures to minimise and reduce hazardous air emissions, greenhouse gases and energy consumption.

### Optimise resource efficiency

Our suppliers should seek to reduce the amount of waste and wastewater generated in their operations and increase the resource efficiency of those materials used by them. They are expected to take appropriate measures to minimise environmental impacts, for example by recycling and reusing materials. The purpose is to achieve a circular economy.

### Prohibition of hazardous substances and waste

Our suppliers must ensure that they comply with the provisions of the Minamata Convention and the RoHS Directive, among others, in order to avoid environmental risks. In the production and use of chemicals, our suppliers must comply with the bans on persistent organic pollutants, for example under the REACH Regulation and the Stockholm Convention. They also comply with the bans on the export and import of hazardous waste under the Basel Convention.

## Responsibility of suppliers

### Compliance with the Supplier Code of Conduct

The Siewert & Kau reserves the right to audit our suppliers' compliance with the Supplier Code of Conduct. For this purpose, our suppliers agree to provide information within a reasonable period of time upon first written request. Where necessary, they will actively participate in the development of remedial actions. Our suppliers agree to disclose required documentation for review. If our suppliers do not comply with our Code of Conduct, they must immediately initiate the necessary corrective measures. Verification of compliance with the Supplier Code of Conduct by the Siewert und Kau can also be effected by means of an audit at the supplier's premises during normal business hours and by prior arrangement. To conduct the audit, the Siewert und Kau is entitled to commission a neutral third party who is obliged to maintain confidentiality. The Siewert & Kau reserves the right to terminate the business relationship in compliance with contractual or legal provisions, regardless of whether the direct suppliers themselves or their subcontractors take measures to remedy the violations of our Code of Conduct.

### Reporting violations and obligations to cooperate

If suppliers discover violations of this Code of Conduct, they are obliged to report them immediately and to cooperate in clarifying the violation. In doing so, the legitimate interests of the suppliers and the rights of the employees, including the protection of data and business secrets, shall be observed and complied with. This also applies to violations at suppliers' subcontractors. In addition, our suppliers must inform potentially affected parties of their rights under this Supplier Code of Conduct and inform them that violations can be reported directly to the Siewert & Kau. Information about violations of this Code of Conduct can be reported at any time via the whistleblower system mentioned below. The information will be processed by the Siewert & Kau Compliance Team together with the necessary departments, and the whistleblower will be informed about the processing and the result.

Our suppliers guarantee that they will not take any disadvantageous or disciplinary measures against whistleblowers.

## Whistleblower system

To ensure that we improve compliance parameters in our supply chain, we need the support of our suppliers. We explicitly encourage business partners, interested parties and other third parties to report violations of our Supplier Code of Conduct as well as human rights or environmental risks to us in order to identify grievances at an early stage. In particular, this applies to violations and risks in the business areas of our suppliers' upstream suppliers and contractors. We have established a whistleblowing system that allows anonymous, confidential and secure communication with our Compliance Department's investigation team.

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E-mail: [compliance@siewert-kau.de](mailto:compliance@siewert-kau.de)

We will diligently investigate any information reported through our whistleblowing system. We will ensure that the whistleblower does not have to fear any disadvantage or retaliation that could occur as a result of using the whistleblowing system.

## Changes to the Supplier Code of Conduct

Siewert & Kau reserves the right to adjust the requirements of this Supplier Code of Conduct in the event of changes to the Siewert & Kau Compliance Standards and to formulate new or adjusted expectations, principles and standards.

Suppliers undertake to comply with the expectations and principles formulated by the Siewert & Kau in the current version of the Supplier Code (<https://www.siewert-kau.de/code-of-conduct>) and to forward them in an appropriate manner within the supply chain.

The Supplier Code of Conduct is subject to the substantive law of the Federal Republic of Germany to the exclusion of the standards that refer to other legal systems.