Veyhl

# BE-051b Code of Conduct for the Business Associates

# of Veyhl GmbH

# Preamble

Veyhl GmbH is committed to responsible and sustainable business practices. This not only includes compliance with the laws of our own country, but also respect for internationally proclaimed human rights and environmental standards. Our goal is to contribute to safeguarding the quality of life for present and future generations by conducting our business operations in a responsible manner. Our business associates play an important role in this process, and we expect them to promote and implement the following principles in their own operations and supply chains.

In accordance with international commercial law, human rights and environmental protection, Veyhl GmbH pursues the goal of proactively implementing measures to identify, avoid and mitigate human rights and environmental risks throughout the entire supply chain. Veyhl GmbH's Code of Conduct is based on the principles of the United Nations Global Compact, the ISO standards and the United Nations Guiding Principles on Business and Human Rights. This Code is intended as an integral part of all contractual agreements between Veyhl and its business associates. We also expect all the suppliers and subcontractors of our business associates to support these standards.

## 1. Principle of legality

All business associates of Veyhl GmbH are obliged to comply with all applicable laws, ordinances and guidelines. This includes, among other things, the protection of human rights, compliance with competition and monopolies law, protection against corruption, protection of the environment and compliance with labour law standards. In their activities, business associates are required to always act in accordance with the highest legal and ethical standards.

# 2. Human rights

Veyhl attaches great importance to the unconditional respect of internationally recognised human rights by its business associates. As a company, we seek to work exclusively with business associates that protect the rights of local communities, indigenous peoples and human rights defenders. In addition, there is a strict ban on the employment of children under the age of 15 and strict regulation of working conditions for young people between the ages of 15 and 18, particularly with regard to hazardous work. Furthermore, any form of work performed under the threat of punishment and without the voluntary consent of the person involved is regarded as forced labour, including subtle forms such as psychological pressure or enforcing financial disadvantages. Child labour, forced labour and any form of slavery or exploitation are strictly prohibited. Our business associates must ensure that all workers are employed on a voluntary basis and have the necessary rights and freedoms.

# 3. Fair working conditions

Our business associates are obliged to comply with the ISO standards in order to ensure fair working conditions. These include fair pay, working hours that comply with legal requirements, and a safe and hygienic working environment. Discrimination of any kind, whether based on gender, skin colour, religion or other characteristics, is prohibited. The right to freedom of association and collective bargaining is to be respected. Furthermore, companies must ensure that appropriate occupational health and safety standards are adhered to in the place of employment, that freedom of association prevails, that there is no discrimination on the basis of various characteristics such as gender, age or religion, and that wages not only meet the minimum legal requirements but also cover the cost of living for employees and their families.

## 4. Occupational health and safety

Veyhl regards compliance with all country-specific health and safety regulations by its business associates as highly important. Business associates are required to take measures to ensure the health and safety of their employees. Companies that operate as manufacturers should introduce and develop an occupational health and safety management system (OHSMS) analogous to the ISO 45001 standard, or operate a system that is customary within the industry.

#### 5. Environmental standards

Environmental protection is a central component of the Veyhl GmbH Code of Conduct. Business associates are obliged to comply with environmental legislation and to look for ways to reduce the negative impact of their business activities on the environment. This includes, among other things, compliance with the precautionary principle, protection of natural resources and reduction of CO2 emissions through the use of sustainable energy sources and increased energy efficiency. Business associates should implement an environmental management system in accordance with ISO 14001 or a comparable standard.

#### 6. Sustainable procurement and the supply chain

Veyhl encourages its business associates to ensure compliance with social and environmental standards in their supply chains to the best of their abilities. This includes the careful selection of suppliers who also strive to implement sustainable practices and comply with human rights and environmental standards. Business associates must ensure that all suppliers and subcontractors meet the requirements of this Code of Conduct. Violations must be reported to Veyhl immediately and measures to counteract risks must be initiated.

All business associates are obliged to avoid business activities that damage the natural foundations of life, such as the contamination of water, soil or air. Furthermore, it must be ensured that products which can cause lasting environmental damage are produced and used in a strictly regulated manner. The environmentally-friendly collection, storage and disposal of waste, in particular the export of hazardous waste, must be ensured.

#### 7. Dealing with conflict minerals

Veyhl expects its business associates to work actively to avoid the use of conflict minerals in their products. Business associates must demonstrate compliance with the applicable legal requirements regarding raw materials produced in conflict zones, and not use raw materials whose extraction supports the financing of armed groups.

#### 8. Avoiding conflicts of interest

Our business associates must ensure that their decisions are always based on objective considerations and are not influenced by personal or financial interests.

Conflicts of interest must be made transparent and reported to Veyhl without delay.

#### 9. Corruption and bribery

Veyhl GmbH's business associates are obliged to comply with all anti-corruption laws. They are prohibited from offering or accepting benefits that could lead to unlawful preferential treatment. Any form of bribery, whether direct or indirect, is prohibited. Business associates should take all measures at their disposal to ensure that these principles are also applied by their subcontractors and representatives.

#### 10. Data protection and information security

The protection of personal data is of fundamental importance. Business associates are obliged to carry out all their business processes with due regard to data protection and information security. All legal requirements regarding data protection must be observed in order to safeguard the right to data privacy.

#### 11. Export controls and customs regulations

Business associates are required to comply with applicable customs and export control regulations. The proactive exchange of relevant information must be ensured to guarantee a secure and legal supply chain.

#### 12. Compliance with the Code of Conduct

Veyhl reserves the right to audit compliance with this Code of Conduct at regular intervals. Business associates must actively participate in such audits and provide information in a timely manner. Should a violation be identified, measures must be taken to end it without delay. Otherwise, Veyhl reserves the right to terminate the business relationship or to cancel the contract.

# 13. Consequences of violations

Any violation of this Code of Conduct constitutes a breach of contract and may result in termination of the business relationship. Business associates are required to take action to eliminate the violation within a specified time frame and to inform Veyhl of the steps taken. If an appropriate response is not made within a reasonable period of time, Veyhl reserves the right to take further legal action, which may include withdrawing from existing contracts.

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