

## The Nagel-Group Code of Conduct for Suppliers

The Nagel-Group is committed to business integrity in compliance with the applicable laws. In our policy and our Code of Conduct for the employees of the Nagel-Group, we set clear minimum ethical standards according to which we orient our conduct. The topics contained in the code cover all aspects of our daily work. The rules and guidelines derived from them provide the necessary security and orientation in our daily work. The code of conduct also has impact outside our business. It shows our customers and partners that the Nagel-Group is a reliable partner. It is firmly anchored in our corporate culture.

We also expect our suppliers (and sub-contractors) to comply with the same minimum ethical standards. The Code of Conduct for Suppliers of the Nagel-Group also defines the Nagel-Group's principles and requirements placed on suppliers of goods and services regarding their responsibility towards people and the environment. Nagel-Group reserves the right to modify the requirements of this code of conduct. In this case, the Nagel-Group expects its suppliers (and sub-contractors) to accept such reasonable changes.

**Hereby, the supplier declares:**

### **I. Compliance with the law and ethical principles**

- We are committed to the compliance with the laws of the respectively applicable legal system(s) and respect the principles of the UN "Global Compact" and the "ETI Base Code" and the principles of the 1998 ILO's "Declaration of Fundamental Principles and Rights at Work" in accordance with national laws and practice.

### **II. Prohibition of corruption, bribery and money laundering**

- To comply with all applicable national and international anti-corruption laws, regulations and standards.
- Neither to tolerate nor engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.
- To comply with all applicable anti-money laundering laws and regulations.

### **III. Fair competition**

- To comply with all applicable competition and antitrust laws.

### **IV. Respect the fundamental rights of employees and ensure fair working conditions**

- To promote equal opportunities and equal treatment of its employees regardless of colour, race, nationality, social origin, possible disability, sexual orientation, political or religious views or sex or age.
- To respect the personal dignity, privacy, and the rights of each individual.
- No one should be compelled to work against their will nor forced to work. Employees must always retain control of their identification documents.
- To ensure that employees do not have to pay any fees or other payments to be employed.
- To be responsible for all payments relating to any legally binding fees and expenses incurred in connection with its employees.
- Unacceptable treatment meted out to workers, such as mental, physical, sexual, and personal harassment or discrimination must not be condoned.
- Behaviour (including gestures, speech, and physical contacts) that is sexual, coercive, threatening, abusive or exploitative must not be tolerated.
- To ensure adequate payment and ensure and contractually establish national laws and industry standards on working hours, overtime, wages, salaries and other employer benefits.

- In so far as it is legally permissible, to recognise workers freedom of association and neither penalise nor give favourable treatment to members of workers organisations or trade unions.

**V. Prohibition of child labour**

- Not to employ children below the legal minimum working age in the respective country or legal system. If no minimum age for employment is specified, no workers are employed who cannot show a minimum age of 15 years. In countries that fall under the exemption for developing countries in respect of ILO Convention 138, the minimum age may be reduced to 14 years.

**VI. Health and safety of employees**

- To assume responsibility for the health and safety of its employees according to the legal requirements.
- To mitigate risks and ensure best possible preventive measures against accidents and occupational diseases.
- To offer trainings and ensure that all employees are competent in health and safety issues.
- To set up and implement an appropriate occupational health and safety management system.

**VII. Environmental protection**

- To observe environmental protection in respect of legal and international standards.
- To reduce environmental pollution and to continually improve environmental protection.

**VIII. Data protection and confidentiality**

- To comply with all data protection and security laws and regulations.
- To adequately protect and not disclose information that is not accessible to the public.

**IX. Supply chain**

- To encourage suppliers in an appropriate manner to comply with the contents mentioned in the Code of Conduct.
- To comply with the principles of non-discrimination in the selection of suppliers and in dealing with these suppliers.

**X. Examination right and consequences of violations**

- To authorise the Nagel-Group to check the compliance with the requirements of this Code of Conduct after reasonable advance notice in the event of justified suspicion of a violation of this Code of Conduct.
- That any violation of the obligations imposed by this Code of Conduct constitutes a material breach of contract.

**XI. Report of violations**

Website: <https://www.nagel-group.com/compliance>

Hotline: The telephone numbers of the individual countries can be found on the above-mentioned website. Here, you can contact an external ombudsperson completely anonymously.