

# Code of Conduct

## Suppliers



Rules of conduct of the Ecoclean Group's Code of Conduct as applicable to our suppliers

(Code of Conduct)

## Change control/version history

### Change Control

<input type="checkbox"/>	This document is currently not subject to change control.
<input checked="" type="checkbox"/>	Quality Management maintains change control for this document.
<input checked="" type="checkbox"/>	The current version of this document is available on the ecoNet.

### Version History

Document version: 4.0 dated 09 March 2023

The following table lists the prior versions of this document.

Version	Date	Change / Reason
1.0	01/09/18	First version
2.0	29/11/21	Revision and online release
3.0	13/03/22	Additions to chapters 8, 14, 16 and 17
4.0	09/03/2023	Extensive changes

## Contents

Preface	4
<b>1 Applicability</b>	<b>5</b>
<b>2 Legality Principle</b>	<b>5</b>
<b>3 Records and Reports</b>	<b>5</b>
<b>4 Relations to Society and the Public, Corporate Responsibility</b>	<b>5</b>
<b>5 Donations</b>	<b>6</b>
<b>6 Financial Responsibility and Disclosure of Information</b>	<b>6</b>
<b>7 Conduct toward Business Partners, Competitors and Third Parties</b>	<b>6</b>
<b>8 Export Controls and Economic Sanctions</b>	<b>7</b>
<b>9 Conduct Toward Employees and Human Rights</b>	<b>7</b>
<b>10 Conflicts of Interest</b>	<b>10</b>
<b>11 Treatment of Ecoclean Property</b>	<b>10</b>
<b>12 Data Protection, Secrecy</b>	<b>11</b>
<b>13 Plagiarisms and Intellectual Property</b>	<b>11</b>
<b>14 Product Quality and Safety</b>	<b>11</b>
<b>15 Sustainability, Occupational Health and Safety, Environmental Protection, Soil Quality</b>	<b>12</b>
<b>16 Diversity of Species, Land Use, Deforestation</b>	<b>12</b>
<b>17 Energy Consumption and Greenhouse Gas Emissions</b>	<b>12</b>
<b>18 Chemicals Management</b>	<b>13</b>
<b>19 Responsible Procurement of Raw Materials</b>	<b>14</b>
<b>20 Whistleblowers</b>	<b>14</b>
<b>21 Implementation and Monitoring</b>	<b>14</b>

## Preface

The Ecoclean Group's Code of Conduct establishes different rules of conduct for daily activities which have to be observed by the employees of Ecoclean. Ecoclean expects of their business partners, namely the suppliers, to adhere to the spirit of Ecoclean's Code of Conduct. In the following we have therefore listed all rules of conduct of the Code that are relevant for you as suppliers. We assume that our suppliers identify themselves with these rules of conduct and take all necessary measures to ensure compliance with the rules of conduct. Furthermore, Ecoclean expects that you make appropriate efforts to ensure compliance with the Code by your sub-suppliers. By doing this you will support Ecoclean's conviction that economic success and the observance of ethic standards are inseparably linked.

If you have any questions concerning the Code of Conduct do not hesitate to contact the Corporate Compliance Officer at Ecoclean GmbH at any time. ([compliance.officer@ecoclean-group.net](mailto:compliance.officer@ecoclean-group.net))

## 1 Applicability

The Code of Conduct of Ecoclean GmbH applies to all companies. At affiliated companies which, by virtue of their corporate structure, are not managed or controlled by Ecoclean GmbH alone (such as joint ventures), it is Ecoclean GmbH's policy to seek general application of the Code of Conduct or the introduction of comparable rules of conduct.

Where local law imposes specific requirements at Ecoclean GmbH locations, those requirements apply. In such cases, the Code of Conduct shall complement such requirements.

Ecoclean GmbH strives to apply the principles of this Code of Conduct when cooperating with business partners, in particular with its customers and suppliers.

## 2 Legality Principle

Ecoclean GmbH and each individual employee  $\pm$  comply with prevailing laws and internal rules.

Ecoclean GmbH's Code of Conduct and the rules of ethical conduct defined therein are the guiding principles governing all business activities of the Ecoclean Group. The "argument" that it is permissible to deviate from the prevailing rules in individual instances for the purposes of business successes, and thus ultimately in the interest of the company, is not accepted.

## 3 Records and Reports

All business transactions must be recorded completely, accurately, on time, and in accordance with established procedures.

All records, reports and entries in documents and books of the Ecoclean Group must comply with generally accepted principles of proper accounting.

## 4 Relations to Society and the Public, Corporate Responsibility

Ecoclean is aware of its responsibility to society and therefore seeks to play an active role as a partner in the community. Ecoclean has a long tradition of supporting local social institutions and organizations. Ecoclean's activities are also consistent with the Global Compact<sup>2</sup>, in which the

United Nations has formulated principles for fair working conditions and responsible business practices.

## 5 Donations

Donations are only made if the recipient and purpose are known. Payments to private accounts are not permitted.

No direct or indirect political donations may be made to election candidates, office holders, or political parties in Ecoclean's name.

Ecoclean does not involve itself in party political activities. However, staff members are free to pursue lawful political activities in their own time. Ecoclean welcomes civic, charitable and social commitment by its staff members.

## 6 Financial Responsibility and Disclosure of Information

It is indispensable that the internal and external reports and documents that have been prepared, published or placed at the disposal of authorities are complete, appropriate, accurate, up-to-date and understandable descriptions. In addition, detailed records and reports on financial information are required to make responsible business decisions. All financial books, records and accounts must accurately reflect the transactions and events and comply with the generally accepted accounting principles and the internal control system. Information is to be published or made accessible as far as possible. Employees who detect discrepancies must be able to report them (see also the chapter titled 'Whistleblowing System').

## 7 Conduct toward Business Partners, Competitors and Third Parties

### Fair Competition

Ecoclean supports fair competition and complies with competition and antitrust regulations.

Any form of direct or indirect bribery or advantages, whether accepting or making payments, gifts or favours of any kind over and above those which are lawfully permitted and customary, is prohibited.

Our policy is to promote Ecoclean products fairly, honestly and lawfully. False, misleading or deceptive statements are not tolerated. In the interest of presenting a uniform global corporate identity, marketing activities are to be coordinated with the Ecoclean Global Marketing Team.

## **Money Laundering Prevention**

Ecoclean complies with its legal obligations to prevent money laundering and does not participate in money laundering activities. Money laundering is the channeling of assets (not only cash) resulting from criminal activity into regular financial and economic circulation.

## **Commissions, Consultants**

Ecoclean only involves consultants and intermediaries in conformity with the general legal conditions. This ensures that remunerations are paid only for consulting and mediation services actually performed and that the remunerations are in an appropriate ratio to the performed service.

## **8 Export Controls and Economic Sanctions**

Governments and international organisations can impose temporary restrictions such as embargoes or economic sanctions concerning certain business transactions or applying to countries or individuals. Ecoclean respects the international regulations and does not make transactions or business with goods or technologies that are subject to restrictions, and expects the same conduct of their business partners.

## **9 Conduct Toward Employees and Human Rights**

We expect our business partners and suppliers to treat their employees fairly, courteously and respectfully. Discrimination and harassment are not tolerated at any of our Ecoclean locations throughout the world. In particular, no discrimination on the grounds of ethnicity, disability, gender, religious belief, age or sexual orientation will be tolerated. Child labour, forced labour and human trafficking are prohibited, rejected without exception, and actively prevented. Ecoclean's suppliers are free to participate in any employee interest group provided for by law.

Suppliers of Ecoclean GmbH guarantee towards their employees:

**a) Wages and Benefits**

- As a matter of principle, wages are to be paid independently of the sex. No sex must be discriminated against the other in any form. The wages paid for a normal working week always correspond at least to the minimum wage prescribed by law or in the industry. Staff members must receive all benefits required by national law (e.g. insurance contributions, allowances, etc.). Staff members must also receive full information on their wages and allowances at regular intervals and in a form that is comprehensible. Wages must be paid in accordance with local customary procedures. Unauthorized deductions from wages, as well as deductions as disciplinary actions, are not permitted.

**b) Working Hours**

The applicable statutory restrictions on working hours are complied with. The maximum permitted working hours per week are regulated by national laws. Restrictions on overtime are regulated in accordance with regional legal or contractual obligations.

**c) Freedom of Association and Collective Bargaining**

The rights to freedom of association and collective bargaining are key fundamental rights and international labour standards, the so-called ILO Core Labour Standards. They are anchored in Conventions No. 87 on Freedom of Association and Protection of the Right to Organise and No. 98 on implementation of the principles of the Right to Organise and Collective Bargaining.

The Right to Freedom of Association ensures that workers have the opportunity to organize and carry out their activities freely and without restrictions or interference. Workers have the right to join and actively participate in trade unions. At the same time, protection exists against any measures directed against this activity.

Collective Bargaining is the negotiation process between an employer (or an employers' association) and one or more trade unions. The objective of collective bargaining is to reach a collective agreement on wages and working conditions. Since these are legally binding contracts, they carry significantly more weight than other agreements between employers and workers.

The rights to freedom of association and collective bargaining are key means for achieving and maintaining fair working conditions. This is because trade unions actively campaign for better working conditions and higher wages. For workers, they are an important means of enforcing their rights.

#### **d) Equal Opportunities**

We support equal opportunities for all sexes. No sex must be discriminated against the other in any form. This does not only concern personal, but also organizational measures regarding the reconciliation of family and work as well as career promotion.

#### **e) Inclusion, Diversity and Equal Rights**

We consider diversity at the workplace as necessary and important. This means to employ humans with different characteristics, such as age, sex, ethnic affiliation, disablement, language, etc. (this list is not exhaustive). It is our understanding that equal rights mean a fair and impartial behaviour, accepting that for some humans there are prejudices and impediments not known to others. To achieve equal rights at the workplace, inequality must be corrected by appropriate support so that everyone has the same opportunities. This ensures inclusion of all humans at the workplace.

#### **f) Rights of Minorities and Indigenous People**

We respect the rights of local population groups, minorities, indigenous people and other vulnerable groups and we strive to avoid negative effects on these.

#### **g) Correct Ethical Recruiting**

Regarding recruiting we observe the following rights and principles:

- In countries where there is a significant lack of specialists, recruiting should only be done in consultation with national authorities in order to avoid a critical lack of specialists in these countries.
- We support humans from other countries in learning our language and finding an accommodation.
- We actively promote integration.

- We enable our employees to stay in contact with in their home countries.
- There are no differences in remuneration or other benefits.

## **h) Land, Forest and Water Rights as well as Eviction**

We observe all land, forest and water rights according to international and national laws. The purchase of materials will not lead to illegal evictions, e.g. for the exploitation of raw materials.

## **i) Use of Private or Public Security Staff**

We do not directly or indirectly support any private or public security staff violating the rule of law or personal rights.

## **10 Conflicts of Interest**

Business and private interests are kept strictly separate at Ecoclean. The individual's own position in the company may not be abused for their own personal gain or that of their family or friends. Preference may not be given to business partners out of personal interests.

Employees are requested to disclose any suspected or actual conflict of interests to their superior and to collaborate with the superior to resolve this conflict.

## **11 Treatment of Ecoclean Property**

Company property, whether tangible or intangible, is intended to assist employees in performing the duties assigned by Ecoclean. It may only be used for lawful business purposes and not for personal gain. Ecoclean employees ensure that company property is protected against loss, theft, and improper use.

Know-how, patents, and property rights are of utmost importance to Ecoclean as a technology group. Supervisors and employees are aware of this and treat intellectual property with particular care and responsibility.

## 12 Data Protection, Secrecy

Personal data on Ecoclean employees and business partners are only stored, processed, and used in compliance with legal regulations. Confidential information supplied by business partners is treated confidentially and used only for the agreed purpose. Conversely, Ecoclean also trusts that entrusted Ecoclean documents are handled with due care. Obligations or agreements concerning particular secrecy are observed at all times. Ecoclean takes appropriate measures to ensure that confidential information is protected.

## 13 Plagiarisms and Intellectual Property

The use of plagiarisms or counterfeit material is prohibited. Should business partners detect such material, it must be immediately blocked and reported. In addition we respect intellectual property and will not use or publish it without authorization. This applies in particular to intellectual property protected by patents, copyrights or brands.

## 14 Product Quality and Safety

Ecoclean develops innovative solutions and manufactures products of a high technological standard that guarantee safe operation. Energy efficiency and the economical use of materials are a focus of Ecoclean's research and development work.

It is the mission of every individual employee of Ecoclean to ensure that Ecoclean's products meet the highest demands in terms of health, safety, environmental protection and quality, and that they also conform to the respective legal requirements.

Ecoclean's production facilities are certified to ISO 9001 standards. In individual cases we carry out certifications according to additional or specific quality management systems.

## **15 Sustainability, Occupational Health and Safety, Environmental Protection, Soil Quality**

Ecoclean is constantly striving to reduce the consumption of energy, materials and resources at all its sites and thus to operate sustainably, which contributes to the long-term success of the company. The importance of complying with environmental protection laws goes without saying, therefore many of our sites have already been certified according to ISO14001.

Our activities or those of our partners must not affect soil or water quality. Waste materials and waste water must be disposed of according to local regulations. Any contaminations of soil or bodies of water are to be reported to authorities immediately.

Ecoclean is committed to creating and assuring a safe, protected, and healthy working environment. Safety regulations and practices are complied with.

## **16 Diversity of Species, Land Use, Deforestation**

Ecoclean, together with their partners in the delivery chain, strive to purchase only certified products supporting the conservation of species (biodiversity) and forests, if applicable. Especially when purchasing wood and paper we can for example rely on FSC certified sources. The use of land must be compatible with nature and landscape and must be carried out in compliance with the laws regarding nature protection, property and land use rights.

## **17 Energy Consumption and Greenhouse Gas Emissions**

As our worldwide presence continues to grow, so does our responsibility for our actions, which must reflect our global commitment to the environment. We expect our suppliers and their contractors to comply with all applicable environmental protection regulations, codes and standards. It is imperative that suppliers be committed to environmental compliance, minimize the environmental impact of their activities, and continuously strive to improve environmental performance. Suppliers must keep records enabling them to answer inquiries about consumption of resources, emissions, environmental compliance, environmental risks and liability, as well as other sustainability indicators.

We expect our suppliers to measure their energy consumption and to reduce avoidable consumption. Energy audits can be a first step towards identifying potential opportunities.

Greenhouse gases, in particular carbon dioxide (CO<sub>2</sub>), intensify the greenhouse effect which leads to global warming. Saving energy significantly contributes to reducing CO<sub>2</sub> emissions. **Fluorinated greenhouse gases (F-gases) are between 100 and 24,000 times more harmful to the climate than CO<sub>2</sub> (source: German Federal Environmental Agency).** Fluorinated greenhouse gases are mainly used nowadays as refrigerants, aerosol propellants, foam and insulation blowing agents, and fire extinguishing agents. In the interest of reducing emissions from these substances, apart from technical measures it is above all necessary to introduce targeted substitute agents or alternative technologies (source: German Federal Environmental Agency).

### **Reporting on Greenhouse Gas Emissions**

We expect of our suppliers that they determine their emissions of greenhouse gases, define their goals for reducing them and keep a report thereof which Ecoclean can consult if necessary.

### **Waste Prevention and Recycling**

Our suppliers are also expected to establish processes that help minimize waste, recycle material, prevent air pollution, conserve energy and reduce carbon emissions, as well as to strive to reduce their consumption of such commodities as water and electricity, and to commit to operating in a sustainable manner. In the annual supplier evaluation of our most important partners, the item 'environment' is a decisive criterion for classification as an A, B or C supplier.

### **Renewable Energies**

We expect of our suppliers that they use renewable energies as far as possible and conclude the respective contracts with their energy suppliers. Wherever possible, they should produce energy themselves (e.g. photovoltaic energy).

## **18 Chemicals Management**

Suppliers should have procedures in place to notify local authorities of any accidental release or introduction of hazardous substances into the environment, or of any other environmental

emergency. The REACH regulation and Candidate List must be observed (<https://echa.europa.eu/de/candidate-list-table>).

Suppliers from Germany must in addition comply with the Chemicals Prohibition Ordinance (ChemVerbotsV) and its implementation.

We expect of our suppliers that they safely dispose of their waste materials in compliance with national regulations, and that they consider the aspect of recycling and environmentally compatible disposal when choosing the mode of disposal.

## 19 Responsible Procurement of Raw Materials

We expect of our suppliers that they exercise due care in the procurement and exploitation of raw materials, also concerning conflict minerals and that they check the exact origin of the materials. The procurement and use of raw materials which have been achieved illegally or through ethically reprehensible or unacceptable actions are to be avoided. This includes raw materials from conflict regions.

## 20 Whistleblowers

Regardless of whether you are an employee or a business partner, you can report suspected criminal offences or serious violations of regulations to us - either stating your name or remaining completely anonymous. You will remain protected. It will be impossible to trace the report back to you, provided you do not disclose any data that could be used to draw conclusions about you. The following reporting form guides you through the process:

<https://Ecoclean-GmbH-group.iwhistle.de/>

## 21 Implementation and Monitoring

This Code of Conduct is a key element of the values lived by Ecoclean GmbH. Consistent compliance with these principles is essential and every business partner is responsible for this.

Implementation and verification of compliance with these principles are accompanied, supported and monitored by the compliance organization established by Ecoclean GmbH's top management.