

CODE OF CONDUCT FOR SUPPLIERS OF VOLLERT HEAVY DUTY SOLUTIONS GMBH

1. PREAMBLE

As an internationally active company, we are committed to an ethically correct, legally compliant, and socially just corporate management and culture. We expect such responsible behavior from all companies with which we maintain business relationships.

Furthermore, we are committed to continuously increasing sustainability of production and improving products. We desire to set a good example in this.

The code of conduct for suppliers compiled by us, Vollert Heavy Duty Solutions GmbH, is to define the requirements to be observed by our suppliers in terms of compliance with laws and regulations, corruption, and bribery, social and working conditions, child labor, and environmental protection.

We pursue the goal of a trusting cooperation with our suppliers, to be secured by this code. We also expect our suppliers to ensure that their subcontractors, suppliers, and similar parties comply with these requirements as well. This is the only way in which we can achieve a safe working relationship and guarantee a high level of security for our customers.

Only the masculine form is used below for reasons of legibility. Any suppliers or employees shall be included in this, however.

2. COMPLIANCE WITH LAWS AND REGULATIONS

Our suppliers must comply with all nationally and internationally applicable laws and regulations, respect fundamental rights and the United Nations Declaration of Human Rights, and conscientiously integrate and protect these in their companies.

3. PROTECTION OF COMPETITION

Vollert Group does not engage in any illegal agreements and practices that restrict competition, in particular any agreements on prices, terms, and market sharing with competitors. We demand the same from our suppliers. Suppliers must coordinate with Vollert before they deviate from any standard contracts or procedures stipulated in cooperation agreements to ensure that no inadmissible effects under competition law will result from this.

Suppliers shall not discuss any internal matters, such as prices and terms of sale or financing, costs, market overviews, organizational procedures, or any other confidential information from which competitors or business partners may derive competitive advantages in any contact with competitors and business partners.

4. BUSINESS PRACTICES

Our suppliers must conduct their business in accordance with the highest ethical standards. All laws and regulations concerning corruption, bribery, fraud, and other prohibited business practices must be observed.

5. SOCIAL AND WORKING CONDITIONS

Our suppliers must respect the fundamental rights of their workers and treat every individual with dignity and respect. The following aspects are particularly important to us:

6. VOLUNTARY EMPLOYMENT

Every employee has voluntarily chosen to be employed by the company and may terminate their employment at any time (subject to the provisions on termination). Practices such as forced labor, compulsory labor, or the like are strictly prohibited.

7. NO CHILD LABOUR

Child labor of any kind is strictly prohibited under applicable national and international law and the Declaration of Human Rights. Any type of child labor will lead to immediate termination of the respective contracts.

8. COMPENSATION

All workers shall be fairly compensated in accordance with the applicable laws and provisions. At least the statutory minimum wage must be paid, but every employee must be able to support their family. Disciplinary deductions or the like are forbidden.

9. WORKING TIME

No employee should work more than 48 hours per week; overtime is voluntary rather than mandatory, and at least one day per week must be a day off. Additionally, all applicable laws and regulations must be observed.

10. DISCRIMINATION

Our suppliers must comply with the applicable laws and provisions concerning discrimination. Hiring or employment shall not be based on race, religion, age, national origin, color, sex, sexual orientation, physical or mental ability, medical condition, political opinion, or any other means of differentiation.

11. ASSOCIATIONS

All employees have the right to become/be a member of a trade union or to form a works council.

12. HEALTH AND SAFETY

Our suppliers must guarantee their employees a safe workplace and provide them with adequate protective clothing. In this context, they must observe all applicable laws and regulations.

13. WORKING CONDITIONS

Our suppliers must guarantee their workers access to drinking water and sanitary facilities. Furthermore, they must take care of providing medical first aid and fire protection. Adequate light and ventilation facilities must be provided as well.

14. ENVIRONMENT

Our suppliers must ensure that they produce their products in the most sustainable manner possible and that they comply with laws relating to environmental protection. Their production should produce the lowest possible amount of emissions; any wastewater produced should be disposed of properly; chemicals should only be used in the smallest quantities required; the production of waste should be kept as low as possible; and recycled goods should be recycled again. Suppliers must have a reliable environmental policy, including the following objectives:

- Conducting transactions in full compliance with the applicable federal, state, and local laws and provisions.
- Demanding awareness of the environment, provisions, and directives and incorporating this into the execution of our plants.
- Reducing risks of damage or injury to the health of employees or the environment.
- Preventing pollution and environmental impact by applying adequate directives and continuous improvement processes.
- Economical and very careful handling of chemicals; chemicals are recorded in the chemicals management system.
- Reviewing potential environmental impacts of operations and modifying operations at need.
- Recycling and reusing of materials wherever possible.
- Taking measures to conserve energy, water, and other resources.
- Using water sparingly and with care.
- Economically and carefully using energy and reducing greenhouse gas emissions.
- Avoiding environmental pollution; minimizing waste, wastewater, emissions, and noise.
- Avoiding air pollution by using appropriately designed production technology.
- Striving for paperless offices and minimizing paper printouts.

15. COMMUNICATION

Our suppliers should inform all employees and suppliers of this code to ensure compliance with it.

16. DATA PROTECTION

Data protection and information security are central components of our corporate policy. The protection of your privacy in connection with processing activities involving personal data, as well as the security of all business data are important concerns for us. We consider these in our business processes. We process any personal data confidentially and only in accordance with the statutory provisions. Our privacy policy can be viewed by anyone – employees, customers and suppliers – on our website <https://www.vollert.de/en/datenschutz>.

17. CONFLICTS OF INTEREST

Any conflict between suppliers' business interests and the interests of Vollert Group or our customers may harm the reputation of the supplier and Vollert Group as a whole. Suppliers should, therefore, avoid such situations in the interest of Vollert Group as well as in their own interest.

18. WHISTLEBLOWING AND PROTECTION FROM RETALIATION

Compliance with laws, provisions, and directives is essential for Vollert Group within the scope of responsible, ethical, and sustainable conduct. This is the only way to practice our values and social responsibility. We will do anything necessary to ensure that Vollert Group acts in compliance with these principles. We expect the same from our suppliers.

Suppliers may discuss any questions concerning anomalies with our purchasing management directly. We also offer all suppliers and any other third parties the opportunity to submit reports on potential breaches of compliance, complaints, or defects of any kind anonymously via our contact form on our website <https://www.vollert.de/de/compliance>. All information will be treated confidentially.

19. CONFIRMATION OF COMPLIANCE

The supplier tacitly agrees to observe and comply with our current code by accepting any individual order from Vollert Heavy Duty Solutions GmbH.

20. AMENDMENTS

Vollert Heavy Duty Solutions GmbH shall announce and publish any amendments to this code at <https://www.vollert.de>.