

Supplier Code of Conduct



for Suppliers and Business Partners of Gerätewerk Matriel e.Gen (‘GWM’)

As part of the introduction of a compliance system, GWM has envisaged and introduced various behavioural guidelines for managerial staff, employees, and business partners. Special attention is paid to GWM’s suppliers, for whom this separate ‘Supplier Code of Conduct’ is intended.

When selecting, assessing, and supporting new and existing business partners, GWM considers not only economic criteria, but also business ethics, integrity, legally compliant conduct, compliance with labour standards, and environmental protection.

The Supplier Code of Conduct reflects this understanding of good business practice. To that end, the code sets forth binding minimum requirements for social and environmental standards for our business partners. It reflects in concrete terms what GWM expects from its suppliers in this regard and the obligations they have toward GWM.

Company Management of Gerätewerk Matriel e.Gen.

Supplier Code of Conduct



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1. Principles of the Supplier Code of Conduct

1.1. Scope of application

For the purposes of this Supplier Code of Conduct, 'business partners' means all companies or partners from whom GWM purchases deliveries and services. Our Supplier Code of Conduct is the foundation of our business relationship and therefore a binding part of the contracts with our business partners. We expect

our business partners to not only follow the principles of this Supplier Code of Conduct but also to communicate them to their suppliers and business partners and use reasonable efforts to ensure that their suppliers and subcontractors comply with them as well.

1.2. Communication

To ensure that the principles of this Supplier Code of Conduct are put into practice, we expect our business partners to make it available to all their employees via suitable channels. Beyond that, we

expect our business partners to set up or participate in an effective grievance mechanism for individuals and groups who might be affected by adverse effects.

1.3. Compliance with legal statutes

We feel that complying with all applicable legal statutes and provisions of the countries in which we do business is self-evident. We expect our business partners to do the same. If national or local laws differ

from the requirements of this Supplier Code of Conduct, the stricter regulation must be complied with to protect humans and nature.

2. Social standards and human rights

GWM believes that responsible company management requires compliance with human rights and good, safe working conditions. Together with our

business partners, we take responsibility for protecting the employees in our value chain and the associated communities.

2.1. Occupational health and safety

The business partner shall protect the health and safety of its employees. The business partner shall assess hazards and potential health risks on a regular basis, take the necessary protective measures, and document both in a risk assessment.

To that end, the principles of an occupational safety management system must be observed: hazards should be avoided as much as possible, and where this is not possible, protective measures should be taken and the employees must be instructed in them.

2.2. Preventing child labour

The minimum age for employment must be complied with in accordance with the laws of the country in question. Employing an adolescent worker who is still required to attend school is forbidden. Robust verification measures must be taken before employment begins to ensure the adolescent is no longer required to attend school. We fully advocate

approved training programs at the workplace that comply with all laws and regulations. Employees under 18 are subject to special protection, however, so they must never perform work that is dangerous or adversely affects their health, safety, or development.

2.3. Preventing forced labour

All work must be performed voluntarily. Business partners shall not participate in or profit from forced labor, modern-day slavery, or work that is performed

under threat of punishment or coercion. Debt bondage and involuntary prison labour must never be used.

2.4. Equal opportunity and ban on discrimination

Employees must be treated fairly and respectfully. Therefore, no form of direct or indirect discrimination that runs counter to the notion of equal opportunity and equal treatment is tolerated at the workplace. In particular: no differentiation, exclusion, or preference

may be shown at the workplace based on gender, race, religion, age, family circumstances, sexuality, background, or affiliation with employee representatives.

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2.5. Wages

Employees must be paid at least the national minimum wage. Unless otherwise regulated under the legal statutes or the collective agreement, the wage will be based on the industry-specific, local,

and collectively agreed remunerations for services. To that end, it must be ensured that the wages paid for a standard week are enough to cover the basic needs of the employees and their families.

2.6. Compliance with working times

The working times must not habitually exceed the working hours envisaged in the respective country. Any overtime must be performed voluntarily. There

must be enough breaks and recovery times in accordance with legal statutes, industrial standards, or collective agreements.

2.7. Appropriate disciplinary measures

Disciplinary measures must not restrict the employees' dignity or rights in any way and must comply with applicable laws. Degrading treatment, physical punishment, and mental or physical

coercion are forbidden. Disciplinary measures must generally be recorded in writing. They must also be explained to the employees orally using plain and simple terms.

2.8. Freedom of association and the right to bargain collectively

The business partners shall respect their employees' freedom of association and right to bargain collectively within the bounds of national laws. It must be possible for employees or their representatives to communicate with the company management and

present ideas and concerns regarding working conditions openly and without fear of discrimination or retaliation. This also applies in countries in which the freedom of association and the right to bargain collectively are restricted.

2.9. Complaints of employees

The business partner shall ensure that its employees have an opportunity to report their concerns and complaints, including confidentially. Internal complaints must be handled and documented in a

systematic, traceable way. The business partner shall notify GWM about any complaints that are relevant to the collaboration with GWM, with no request being necessary.

3. Environmental protection

Protecting the environment is another key task for GWM and its business partners. Accordingly, we jointly undertake to handle resources efficiently and responsibly, avoid damage, and continually reduce

the emission of greenhouse gases. Other harmful emissions in the air, water, or soil must also be avoided or reduced as much as possible.

3.1. Environmental legislation

All legal statutes, regulations, and standards for protecting natural resources and the environment must be complied with. Moreover,

the business partner shall obtain all necessary permits and licenses and comply with their requirements and ancillary provisions.

3.2. Environmental management systems

The business partner shall continually minimize its environmental impact and hazards and its consumption of resources. The business partner shall systematically pursue these objectives and be able to verify them through a certified environmental management system. This especially applies for

business partners with their own production facilities. If the company does not have a certified environmental management system, it must appoint an environmental management officer who is entrusted to implement environmental goals and programmes.

4. Compliance and fair collaboration

4.1. Business integrity and compliance measures

The business partner ensures that it operates an effective system for avoiding corruption, antitrust

violations, money laundering violations, and white-collar crimes in its company that is suited for ensuring

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that the employees act in accordance with regulations. This system is based on a risk assessment of the company and is subject to

continual improvements in terms of the measures taken, structures, and processes.

4.2. Anti-corruption; Preventing money laundering activities

Corruption and white-collar crime (such as breach of trust or fraud) is not tolerated in any form. Our business partners and the people acting on their behalf must not actively offer, promise, or grant any advantages (such as bribery, granting benefits) or passively request any advantages, allow any to be promised to them, or accept any (being bribed,

accepting benefits) with the goal of obtaining an order or other preference. Invitations and gifts must not be misused as a means of exerting influence. Our business partners shall comply with the relevant statutory obligations for preventing money laundering and shall not directly or indirectly participate in any money laundering activities.

4.3. Taxes and correct bookkeeping

Our business partners shall consistently comply with requirements under tax law. Furthermore, all

business activities must be recorded through accurate, complete bookkeeping.

4.4. Antitrust and competition law

Our business partners shall not engage in any unlawful conduct, such as colluding with competitors to restrict or distort fair competition or the free market,

and shall otherwise comply with all requirements under antitrust and competition law.

4.5. Customs law and foreign trade law

Our business partners shall comply with the national and international customs laws and the regulations on foreign trade, the combating of terrorism, and embargos. They shall observe the applicable

restrictions and bans of foreign and domestic trade with certain goods, technologies, or services as well as countries and specific people.

4.6. Avoiding conflicts of interest

All actions and decisions must be based on objective criteria. Our business partners shall lay the necessary foundations for this by avoiding conflicts of

interest with any private, economic, or other activities and handling any appearance in this regard as transparently as possible.

4.7. Protecting confidential information; Third-party property rights; Data privacy

Our business partners shall not disclose any trade or business secrets, shall observe other third-party property rights, and shall protect personal data. This includes handling exchanged documents carefully, carefully storing confidential data and information

that are not common knowledge, and protecting the data and information from unauthorised access by third parties. Applicable data protection regulations must be complied with.

5. Compliance with the Supplier Code of Conduct

5.1. Checking for compliance with the Supplier Code of Conduct

GWM may check for compliance with the Supplier Code of Conduct at any time through various measures, such as self-assessments from suppliers, the presentation of certificates, and information from third parties. If necessary, the business partner shall permit GWM to check or commission one or more third parties to check whether the principles of this

Supplier Code of Conduct are being complied with by performing an on-site audit during normal business hours, either on the business partner's premises or at other locations at which services are rendered on the business partner's behalf, with no appointment being required.

5.2. Mechanism in the event of noncompliance

If any of the principles or requirements of this Supplier Code of Conduct are breached, the business partner shall take measures to improve the

situation within a reasonable period. Breaches committed by the business partner against the principles and requirements of this Supplier Code of

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Conduct will be deemed a material breach of the contract relationship. If the business partner commits such a breach, GWM may suspend some or all of the business relationship. If the breach continues

even after a grace period for rectification is set, GWM may terminate the relationship.

6. Opportunity for contact and complaint

To report actual or suspected compliance violations or violations of the principles of this Supplier Code of Conduct, business partners may use the independent point of contact set up at GWM for that

purpose. The regulations put in place by GWM define clear responsibilities and processes for clearing up tips, guarantee confidentiality, and offer optimal protection for everyone involved.

7. Supplier statement

We hereby confirm that we have received the Supplier Code of Conduct and shall comply with its principles and requirements.

We also confirm that when this Supplier Code of Conduct is signed it will become part of any existing

contract relationship(s) between us and GWM. If this Supplier Code of Conduct contradicts the existing contract relationship(s), the more far-reaching regulation will govern.