

2	Require	irements for suppliers		
2	2.1 Social responsibility			2
	2.1.1	Elimination of forced labour		2
	2.1.2	Prohibition of child labour		2
	2.1.3	Fair wages		2
	2.1.4	Fair working hours		2
	2.1.5	Freedom of association		3
	2.1.6	Prohibition of discrimination		3
	2.1.7	Health protection; occupational safety		3
	2.1.8	Complaint mechanisms		3
	2.1.9	Dealing with conflict minerals		3
2	2.2 Er	nvironmental responsibility		3
	2.2.1	Treatment and discharge of industrial wastewater		4
	2.2.2	Dealing with air emissions		4
	2.2.3	Dealing with wastes and hazardous substances		4
	2.2.4	Reducing consumption of raw materials and natural resources		4
	2.2.5	Dealing with energy consumption and efficiency		4
2	2.3 Bu	ısiness ethics		4
	2.3.1	Fair competition		4
	2.3.2	Privacy / data security		
	2.3.3	Intellectual property		
	2.3.4	Integrity / corruption, personal gains		
3		entation of requirements for suppliers		5
	<u>'</u>	· · · · · · · · · · · · · · · · · · ·		
				_
		Aktivität/Activity	Datum/Date	Bearbeiter/Ed
	l-Nr/Part-No ippe/class o			
	ID		Index	



Seite 2 von 7

4	Information and consent of the supplier	5
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1 Introduction / Preamble

We, digades GmbH, commit to environmentally and socially responsible business management.

We also require all of our employees to respect the principles of environmentally and socially responsible and ethical conduct. We expect the same conduct from all of our suppliers.

Furthermore, we strive continually to optimize the sustainability of our corporate. We ask our suppliers to contribute to these efforts. For future cooperation, the contracting partners agree on the validity of the following rules for a common CoC. This agreement forms the basis for all future deliveries of suppliers. The contracting partners commit to fulfil all of the principles and requirements of the CoC.

The suppliers are requested to contractually commit their subcontractors to adhere to the standards and rules specified in this document.

This agreement shall enter into force upon signature. Violation of this CoC can constitute a cause and reason for digades GmbH to terminate the business relationship, including all associated supply contracts.

2 Requirements for suppliers

The CoC is based on national laws and regulations as well as international conventions such as

- The United Nations' Universal Declaration of Human Rights,
- Guiding principles about children's rights and child labour,
- The United Nations Guiding Principles on Business and Human Rights and
- The International Labour Organization's international labour standards

We expect our suppliers to adhere to all relevant laws and regulations as well as to the requirements of standards.

2.1 Social responsibility

2.1.1 Elimination of forced labour

- No forced labour, slave labour or similar form of labour may be used.
- All work must be done by choice, and employees must be able to end the work or the employment relationship at any time.
- Furthermore, no worker may be subjected to unacceptable treatment such as psychological cruelty or sexual or other personal harassment.
- This content refers to ILO Conventions 29 and 105.



Seite 3 von 7

2.1.2 Prohibition of child labour

- Child labour Is forbidden at every phase of business activity.
- The suppliers are called upon to adhere to the ILO conventions' recommended minimum age for the employment of children. According to these recommendations, the age should not be lower than the age at which compulsory school attendance ends, and should in no case be lower than 15.
- This content refers to ILO Conventions 79, 138, 142 and 182

2.1.3 Fair wages

- The wage for regular working hours and overtime must comply with at least the statutory national minimum wage or the customary minimum wage for the industry, whichever is higher. In every case, the wage for overtime hours must be higher than the wage for regular hours. If the wage is not sufficient to cover the usual cost of living while allowing the worker to accumulate a minimum amount of savings, the supplier is obligated to increase the worker's pay to reach a sufficient level for this. All legally mandated benefits are to be provided to employees.
- Wage deductions as a punitive measure are not permitted.
- The supplier must ensure that the employees receive clear, detailed and regular written information about the composition of their pay.
- This content refers to ILO Conventions 26 and 131.

2.1.4 Fair working hours

- The working hours must comply with the applicable laws and industry standards.
- Overtime is only permitted if it is performed on a voluntary basis and does not exceed a total of 12 overtime hours per week.
- After six consecutive working days, an employee is to be provided with at least one day off.
- The total weekly working hours cannot regularly exceed 48 hours.
- This content refers to ILO Conventions 1 and 14.

2.1.5 Freedom of association

The right of employees to form and join organisations of their own choosing and to engage in collective bargaining (e.g. to join trade unions) is to be respected. In cases in which freedom of association and the right to hold collective meetings are legally restricted, alternative possibilities for an independent association of employees for the purpose of collective bargaining are to be permitted. Employee representatives are to be protected from discrimination. They are to be granted free access to their colleagues' workplaces to ensure that they are able to



Seite 4 von 7

exercise their rights in a lawful and peaceful manner. The supplier shall respect workers' right to freedom of association, to joining trade unions, to appealing to worker representatives and to membership in work councils in accordance with the applicable local laws.

- It must be possible for workers to communicate openly and without fear of reprisals or harassment.
- This content refers to ILO Conventions 87, 98, 135.

2.1.6 Prohibition of discrimination

- Discrimination against employees in any form is prohibited. This applies, for example, to discrimination on the basis of gender, race, caste, skin colour, disability, political convictions, family background, religion, age, pregnancy or sexual orientation.
- The personal dignity privacy and personal rights of every individual shall be respected.
- This Content refers to ILO Conventions 110, 111 and 159.

2.1.7 Health protection; occupational safety

- The supplier is responsible for a safe and healthy working environment.
- Through the construction and use of suitable workplace safety systems, the necessary preventive measures are taken against accidents and injuries to health that could occur in connection with workplace activities. The employees are also informed regularly about the applicable health protection and safety norms and measures, and receive training about them.
- The employees are provided access to adequate quantities of drinking water and to clean sanitary facilities.
- This content refers to ILO Conventions 155 and 164.

2.1.8 Complaint mechanisms

 At the operational level, the supplier is responsible for establishing an effective complaint mechanism for individuals and communities who could be affected by negative impacts.

2.1.9 Dealing with conflict minerals

 For the conflict minerals tin, tungsten, tantalum and gold, as well as for additional raw materials such as cobalt, the company establishes processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of



Seite 5 von 7

Minerals from Conflict-Affected and High-Risk areas, and it expects its suppliers to do the same.

- Smelting and refining without appropriate and audited processes of due diligence is to be avoided.

2.2 Environmental responsibility

We expect our suppliers to maintain environmental management, ideally according to ISO 14001 or EMAS as well as ISO 50001.

Regardless of an externally certified environmental management system, we require our suppliers to comply with the following environmental issues.

2.2.1 Treatment and discharge of industrial wastewater

- Wastewater from operating procedures, production processes and sanitation facilities is to be typed, monitored, tested and treated as needed before it is introduced or disposed of.
- Beyond this, measures should be introduced to reduce the generation of wastewater.

2.2.2 Dealing with air emissions

- General emissions from operating procedures (air and noise emissions) and greenhouse gas emissions are, before the are released, to be typed, routinely monitored, and treated as needed.
- It is also the supplier's responsibility to monitor their emissions treatment systems and the supplier is obliged to find cost-effective solutions for minimizing all emissions.

2.2.3 Dealing with wastes and hazardous substances

- The supplier shall pursue a systematic approach in order to identify solid waste, manage it, reduce it, and responsibility dispose of or recycle it.
- Chemicals and other materials that pose a danger when they are released into the environment are to be identified and managed in such a way that safety is ensured when people interact with these materials, as well as when they are transported, stored, used, recycled or reused, and when they are disposed of.

2.2.4 Reducing consumption of raw materials and natural resources

- The use and consumption of resources during the production process and the generation of waste of any sort, including water and energy, are to be reduced and avoided. This takes place either directly at the place where the waste is



Seite 6 von 7

generated or through processes and measures – for example, through changing production or maintenance procedures or processes in the company, through the use of alternative materials, through economizing, through recycling or through the reuse of materials.

2.2.5 Dealing with energy consumption and efficiency

- Energy consumption is to be monitored and documented.
- Cost-saving solutions are to be found to improve energy efficiency and minimize energy consumption.

2.3 Business ethics

2.3.1 Fair competition

- Norms of fair business practices, fair advertising and fair competition are to be observed.
- Beyond this, the relevant antitrust laws, which particularly prohibit agreements and other activities to influence prices or conditions, are to be applied.
- These rules further prohibit agreements between customers and suppliers that are intended to limit customers' freedom to autonomously determine the prices and conditions for their resale of goods.

2.3.2 Privacy / data security

- The supplier commits to fulfil the reasonable expectations of the client, subcontractors, customers, consumers and employees concerning the protection of private information.
- In the collection, storage, processing, transmission and transfer of personal information, the supplier is to observe the laws on data protection and information security as well as the regulatory requirements.

2.3.3 Intellectual property

 Intellectual property rights are to be respected; transfers of technology and expertise are to be carried out in such a way that intellectual property rights and customer information are protected.

2.3.4 Integrity / corruption, personal gains

- The highest standards of integrity are to be applied to all business activities.
- The supplier must pursue a zero-tolerance policy regarding the prohibition of bribery, corruption, extortion and embezzlement.



Seite 7 von 7

 Processes for monitoring and implementing norms are to be applied in order to ensure compliance with anti-corruption laws.

3 Implementation of requirements for suppliers

We expect our suppliers to identify risks within supply chains and take appropriate measures.

In the case of a suspected violation, as well as to safeguard supply chains with heightened risks, the supplier will inform the company promptly and, if necessary, regularly about the identified violations and risks and about the measures taken.

We will use a self-assessment questionnaire as well as sustainability audits at the suppliers' production sites to monitor compliance with the Code at the supplier's production sites during normal business hours, with sufficient advance notice and as carried out by persons whom the client tasks with doing so. The supplier can object to specific audit measures if these measures violate mandatory data protection regulations.

If a violation of the rules of this Code of Conduct is identified, the client shall notify the supplier of this in writing within one month and will provide a suitable period of time within which the supplier's conduct is to brough into compliance with these rules. If the violation was caused culpably and this renders the continuation of the contract until its due termination unacceptable for the client, the client can end the contract upon the expiration of the stated time period if the client has threatened to do so when setting the period of time. The legal right to extraordinary cancellation without providing an additional time period shall remain unaffected, as shall the right to damages.

4 Information and consent of the supplier

By signing this document, the supplier commits to act responsibly and adhere to the principles and requirements specified herein.

The supplier commits to communicate the content of this Code in a comprehensible manner to employees, contractors and subcontractors and to make all necessary arrangements to meet the requirements.