

HAIDLMAIR

SUPPLIER CODE OF CONDUCT



HAIDLMAIR GmbH

Haidlmairstraße 1
A-4542 Nußbach

phone: +43 7587 6001 - 0
office@haidlmair.com



 www.haidlmair.com



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Supplier Code of Conduct

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I. Preamble



As a family business, HAIDLMAIR is aware of its corporate responsibility towards its employees, its partners and the environment. We have always been keen to place responsible action at the forefront of our activities. For this reason, we have been concerned for some years with the sustainable development of our company, especially in the context of the global agenda for sustainable development. Our corporate behaviour and performance are supported by our Supplier Code of Conduct.

Responsible sourcing is an important tool for promoting sustainable values and practices throughout the value chain. We intend to build strong, pro-active and long-term working relationships and partnerships with our suppliers and encourage responsible behaviour along our supply chain to create long-term value from them. Sustainability is an essential part of HAIDLMAIR's corporate philosophy and therefore also of our supplier management. Suppliers are an important and essential part of our success, so it is important to consider them as a critical factor.



II. Definition and Scope

Suppliers are companies or persons who manufacture goods, trade in goods or provide services; in particular, these are also the suppliers of all materials and services as well as all contractors, consultants, outsourcing service providers, dealers and other business partners.

This Supplier Code of Conduct applies to all current and future business relationships of the supplier with HAIDLMAIR.

We expect our suppliers to apply similar requirements to their own supply chain.



III. The Supplier Code of Conduct

HAIDLMAIR's Supplier Code of Conduct sets minimum standards and expectations for environmental, social and ethical performance for all our suppliers. We have zero tolerance for unethical business behaviour such as human rights violations, corrupt business practices, cartel agreements and the like, as we place great value on business integrity and ecologically responsible behaviour. HAIDLMAIR expects its suppliers and service providers (hereinafter referred to as "Supplier") to conduct their business in accordance with comparable standards and benchmarks as set out in this Supplier Code of Conduct. In doing so, they are guided, among other things, by the principles contained in the following international regulations in the respective current version or any successor regulations:

- The so-called "Ten Principles" on which the United Nations Global Compact is based.
- The OECD Guidelines for Multinational Enterprises of 25 May 2011.
- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict and High-Risk Areas (OECD Conflict Minerals Guidance), April 2016, 3rd edition 2019.
- The Universal Declaration of Human Rights of the United Nations of 10 December 1948.
- The UN Guiding Principles on Business and Human Rights (Resolution 17/4 of 16 June 2011).
- The ILO Declaration on Fundamental Principles and Rights at Work of 18.6.1998.
- The ILO Conventions 138 und 182 and the ILO-IOE Child Labour Guidance Tool for Business of 15 December 2015.
- The UN Convention against Corruption of 31.10.2003.
- The Rio Declaration on Environment and Development of the United Nations of 14 June 1992.
- The global climate change agreement of the UN Climate Change Conference in Paris (COP 21) of December 2015, which entered into force on 4 November 2016.



IV. Requirements to be met by the supplier

IV.1 Compliance

The supplier shall comply with the applicable laws in force worldwide without exception in its business conduct. It shall ensure compliance. This compliance refers to the risks of its business activity and measures appropriate to its size.

IV.2 Social Responsibility

Ban on child labourer

As a HAIDLMAIR supplier you are prohibited from

- no matter in which phase of your production child labour is used, i.e. any employment of children below the local legal minimum age of employment, must be avoided at all costs. If no minimum age is set by law, the self-imposed age limit of 15 years applies.

As a HAIDLMAIR supplier you are obliged to

- employ persons under the age of 18 exclusively in accordance with the applicable national legal provisions. The rights of young employees must be protected unconditionally. Such persons may not be employed for work which is harmful to their health, safety or morals. Special protective regulations must be observed and complied with in this respect.

Fair Pay

It is particularly important to HAIDLMAIR that you as a supplier ensure fair remuneration within the framework of the applicable laws and principles mentioned in the preamble.

This includes, among other things:

- Remuneration and compensation that comply with the applicable laws or the minimum standards for regular working hours and overtime customary in the industry. The remuneration for overtime must, in any case, exceed the remuneration for regular working hours.
- If the fee paid is not sufficient to cover the costs of ordinary living expenses and to build up a minimum level of reserves, you are obliged to increase the fee accordingly.
- Workers must be granted all benefits prescribed by law; wage deductions as punitive measures are not permitted.
- Clear, detailed and regular written information to workers on the composition of their pay.





Fair Working Hours

As a supplier of HAIDLMAIR, you must ensure fair working hours within the framework of the applicable laws and principles mentioned in the preamble.

- They ensure compliance with legal maximum working hours or industry standards.
- Overtime work by employees is only permissible if it is performed on a voluntary basis.
- The maximum working hours according to the respective national legislation must not be exceeded on a regular basis.
- They shall grant holidays and days off at least within the limits of the law.

Exclusion of forced labour

As a supplier of HAIDLMAIR, you undertake to comply with the following points in relation to forced labour in your business activities:

- They renounce work which is the consequence of the exercise of any form of coercion (prohibition of forced, slave or compulsory labour). All work must be voluntary and without the threat of punishment.
- They shall refrain from any unacceptable treatment of workers and undertake to refrain from psychological hardship, sexual and personal harassment or humiliation.

Health protection, safety in the workplace

As a HAIDLMAIR supplier you undertake to take care of the following points:

- They shall take appropriate organisational and other measures as part of the management of safety and health risks in the workplace. These measures shall in any case include at least the applicable legal requirements.
- They shall ensure the establishment and application of appropriate occupational safety systems and take the necessary precautions against accidents and damage to health that may arise in connection with the activity.
- They prevent excessive physical or mental fatigue by taking appropriate measures.
- You inform employees sufficiently about the risks at the workplace and train them accordingly so that these can be minimised.
- In your company, you ensure that workers have access to drinking water in sufficient quantities, as well as access to clean sanitary facilities.



Freedom of association

As a Haidlmair supplier, you must ensure that employees are able to raise their concerns about the employment relationship within the framework of the applicable legislation on collective representation and trade union membership, without fear of discrimination.

Non-discrimination

As a supplier of Haidlmair, you must refrain from any form of discriminatory behaviour. Regardless of race, ethnic origin, gender and sexual orientation, religion, faith, ideology, disability, age, trade affiliation, etc., all people have the same rights and may not be disadvantaged in any way on the basis of one or more of these points.

Preservation of the natural foundations of life

As a Haidlmair supplier, you must refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this harms the health of people, significantly impairs the natural basis for the production of food or prevents people's access to safe drinking water and sanitary facilities.



IV.3 Environmental responsibility

The protection and preservation of our environment is of great concern to us. Therefore, we require our suppliers to apply at least the same standards as HAIDLMAIR. The introduction or maintenance of a certified environmental management system according to ISO 14001 or a comparable system is strongly recommended. At a minimum, however, optimal environmental protection must be ensured in all phases of the manufacturing and delivery process.

Waste water management

Suppliers will ensure that wastewater from operations, manufacturing processes and sanitary facilities is classified, monitored, inspected and, if necessary, treated appropriately before discharge or disposal. In principle, you should ensure that measures are taken to reduce the generation of wastewater.

Air emissions

They shall ensure that general emissions from operations (air and noise emissions) and greenhouse gas emissions are classified, routinely monitored, verified and, if necessary, appropriately addressed prior to their release. As a supplier, you are obliged to monitor your exhaust gas cleaning systems and to find economic solutions to minimise any emissions. In particular, you take ongoing measures to measure and, if possible, reduce your CO₂ emissions.

Hazardous substances, pollutants and waste

Suppliers are obliged to inform themselves independently about the respective current directives, laws and standards and to ensure their

complete compliance. The central element is Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 (REACH). It is the supplier's duty of care not to use prohibited substances or to observe and point out corresponding restrictions. As a matter of principle, please refrain from using products and raw materials of unknown origin and/or whose composition is not sufficiently known. This also applies to raw materials for which you do not have sufficient material data.

As a supplier of HAIDLMAIR, you are obliged to systematically determine, handle and reduce your solid waste. You ensure responsible disposal and recycling. The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989, as amended from time to time, must be observed. You are obliged to prevent the release of other materials (e.g. chemicals) into the environment.

In addition you must identify and manage substances which present a hazard in such a way that safety is ensured at all times during their handling, transport, storage, use, recycling or reuse and disposal.



Reducing the consumption of raw materials and natural resources

As a supplier of HAIDLMAIR, you undertake to reduce or, if possible, completely avoid the use and consumption of resources during production. This is done either directly at the point of origin or through procedures and measures to optimise processes in the company, through savings, recycling or with the help of the reuse of materials.

Energy consumption/efficiency

You must monitor and document your energy consumption as completely as possible. You commit yourself to the greatest possible energy efficiency. Economic solutions must be found to improve energy efficiency and minimise energy consumption.



IV.4 Business ethic

Corruption

Without exception, you comply with the applicable national and international anti-corruption regulations, laws and standards.

As a supplier of HAIDLMAIR, you consistently reject any form of bribery, unlawful acceptance or granting of advantages. Furthermore, you ensure that neither you nor your employees, subsidiaries, business partners or third parties directly or indirectly grant advantages of any kind to officials or employees of the state or state-owned companies and organisations on your behalf or with your knowledge or acquiescence in order to obtain a business advantage or to influence the decision of the recipients of the advantage in their respective function.

When working with HAIDLMAIR employees, you must ensure that the following benefits are waived without exception:

- Gifts whose value exceeds customary occasional gifts of low value
- Invitations and hospitality that go beyond what is customary in business
- Recurring invitations to events which are exclusively or mainly for pleasure purposes.
- Invitations that include partners of the invited person
- Invitations that include travel or accommodation expenses.



Open Competition

As part of the global economy, we are committed to open and fair competition. As a supplier of HAIDLMAIR, we assume that you will completely refrain from any anti-competitive behaviour such as price agreements, splitting of market segments, price fixing, etc. You will pursue a zero tolerance policy regarding competition agreements and instruct your employees accordingly.

In doing so, you pursue zero tolerance with regard to competitive agreements and instruct your employees accordingly.

Money Laundering

You must respect the applicable laws and regulations in the area of money laundering.



V. Implementation of the requirements

V.1 Responsibilities of the supplier

As a supplier, you are obliged to carry out a regular risk analysis of your business activities. This should enable you to identify and record risks in good time. As a result, you should define and implement suitable and appropriate preventive measures with clearly defined responsibilities. This applies to your own business as well as to the activities of your direct suppliers. You are obliged to fully document the risk assessment process. In the event of suspected violations, HAIDLMAIR must be informed promptly and comprehensively. Any countermeasures must also be mentioned.

V.2 Monitoring and verification

HAIDLMAIR will verify compliance with the requirements of this Code of Conduct using appropriate tools. The Supplier agrees that HAIDLMAIR will carry out these checks in close coordination with the Supplier. HAIDLMAIR will comply with mandatory legal data protection requirements.

V.3 Sanctions

Should you fail to comply with the aforementioned requirements in one or more cases, HAIDLMAIR reserves the right to demand appropriate measures and, in the event of failure to comply with these requirements, to suspend or completely terminate the supplier contract.





VI. Whistleblower System

Haidlmair operates a whistleblower system that is open to Haidlmair employees as well as employees of suppliers and customers to report possible unethical behaviour or illegal actions.

The link to access the whistleblower system can be found on the Haidlmair website.

We ask our suppliers to inform their employees of this complaint procedure in an appropriate manner.

VII. Declaration of Consent

This Supplier Code of Conduct shall enter into force upon signature by the Supplier and shall be valid as long as the business relationship between Haidlmair and the Supplier exists.

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Digital Supplier Signature

