

This code of conduct defines the principles and requirements that Neugart GmbH requires of its suppliers and business partners with an intermediary function with regard to their responsibility to people and the environment. Neugart GmbH reserves the right to modify the requirements of this code of conduct in the event of appropriate changes to the Neugart compliance program. In this case, Neugart GmbH expects its suppliers to accept appropriate changes.

## THE SUPPLIER AND/OR BUSINESS PARTNER WITH INTERMEDIARY FUNCTION HEREBY DECLARES THAT IT WILL:

### ● ADHERENCE TO THE LAWS

- Adhere to the laws of the respective applicable legislation.

### ● BAN ON CORRUPTION AND BRIBERY

- Not tolerate corruption or bribery in any form and not participate in any way, either directly or indirectly and will not offer, grant or promise appropriations to government officials or private counterparts in order to influence official dealings or gain an unfair advantage.

### ● FAIR COMPETITION, ANTI-TRUST LAW

- Act in accordance with the national and international competition laws and not participate in price agreements, the allocation of markets or customers, market agreements or quotation agreements.

### ● CONFLICTS OF INTEREST

- Avoid all conflicts of interest which can have a negative influence on the business relationships.

### ● CONSIDERATION OF THE BASIC RIGHTS OF EMPLOYEES

- Encourage the equal opportunities and equal treatment of its employees irrespective of their skin color, race, nationality, social origin, handicap, sexual orientation, political or religious conviction, sex or age;  
Respect the personal dignity, privacy and personal rights of each individual, and not employ anyone against their will or force them to work;
- Not tolerate unacceptable treatment of employees such as physical abuse, sexual and personal harassment or discrimination;
- Not tolerate behavior (including gestures, language and physical contact) which is sexual, coercive, threatening, abusive or exploitative;
- Provide appropriate remuneration, pay the legally defined minimum wage and adhere to the legally defined number of working hours in the respective state;
- Provided that it is legally permitted, accept the freedom of association of the employees and neither prefer nor discriminate against members of employee organizations or unions.

### ● PROHIBITION OF CHILD LABOUR

- Not take on workers who cannot prove that they are at least 15 years of age. The minimum age may be reduced to 14 years in countries which come under the exception for developing countries according to ILO convention 138.

### ● HEALTH AND SAFETY OF EMPLOYEES

- Take responsibility for the health and safety of its employees;
- Minimize risks and provide the best possible precautions against accidents and occupational sicknesses;
- Provide training and ensure that all employees are up to speed on the subject of work safety;
- Set up and use an appropriate work safety management system.

# CODE OF CONDUCT FOR NEUGART SUPPLIERS



## PROTECTING THE ENVIRONMENT

- Protect the environment with regard to the legal and international standards;
- Minimize pollution and continuously improve environmental protection;
- Set up and use an appropriate environment management system.

## DELIVERY CHAIN

- Encourage its suppliers to adhere to the Code of Conduct in an appropriate way;
- Adhere to the principles of non-discrimination in terms of supplier selection and dealing with suppliers.

## CONFLICT MINERALS

- Take appropriate measures to avoid the use of raw materials in its products that directly or indirectly finance armed groups that violate human rights.

## INTELLECTUAL PROPERTY

- Respect the right to intellectual property; technology and know-how transfers must take place in such a way that intellectual property rights and customer information are protected.

## CONFIDENTIALITY/DATA PROTECTION

- The supplier is obliged to fulfil the appropriate expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information;
- The supplier must pay attention to the laws concerning data privacy and information security and the official regulations during the collection, storage, transfer and forwarding of personal information.

## SUPPLIER DECLARATION

### WE HEREBY CONFIRM:

- We have received the Code of Conduct and hereby commit ourselves to adhering to the principles and requirements of this Code of Conduct in addition to our obligations from the delivery agreements with Neugart GmbH.
- We agree that this declaration is subject to the material law of the Federal Republic of Germany with the exclusion of the standards which refer to other legal systems.

Place, Date

Signature

Name (please print), Position

Company stamp

This document must be signed by a properly authorized company representative and returned to Neugart GmbH within 10 days of receipt.