



ZEWOTHERM Supplier Code of Conduct for Suppliers

Version 1.0 – English version
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1. Introduction

ZEWOTHERM stands for future-proof, efficient and sustainable solutions in building technology that make an active contribution to the energy transition and responsible construction. ZEWOOTHERM sees itself as a company that conducts its business activities in an ecologically, socially and ethically responsible manner and aligns its supply chain accordingly. We expect our business partners and suppliers to share this commitment and to embed the principles of sustainable and responsible corporate governance in their own organizations.

For the cooperation with ZEWOOTHERM, we expect our suppliers to accept the following regulations as a binding basis for all current and future supply relationships. The supplier undertakes to communicate the principles of this code to its direct suppliers in a reasonable manner and secure the principles contractually in high-risk contexts. The nature and scope of the measures depend on the type, scope, and risk profile of the respective supply relationship. This agreement shall enter into force upon its signature. In the event of serious or repeated violations of the principles of this code, we reserve the right to terminate the business relationship, including the underlying supply contracts, after an appropriate consideration of interests and unsuccessful remedial action.

This Code of Conduct is based on national laws and regulations such as the Supply Chain Due Diligence Act (LkSG), as well as international conventions including the UN Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, Children's Rights and Business Principles, UN Guiding Principles on Business and Human Rights, International Labour Standards, and the Principles of the United Nations Global Compact.

2. Human rights, working conditions and social responsibility

2.1 Respect for international standards

Our suppliers respect internationally recognised human and labour rights, in particular the UN Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, Children's Rights and Business Principles, UN Guiding Principles on Business and Human Rights, International Labour Standards, and the Principles of the United Nations Global Compact.

2.2 Prohibition of child labour

Child labour is prohibited at all stages of the supply chain. The minimum age for employment is at least the age at which compulsory schooling ends and in any case not less than 15 years. Young people under the age of 18 may not be employed in hazardous, unhealthy, or morally harmful work.

2.3 Prohibition of forced labour and modern slavery

All forms of forced, debt slavery, compulsory labour, serfdom and modern slavery are prohibited. In addition, any form of unacceptable treatment of workers, such as psychological hardship, sexual or personal harassment, is strictly prohibited.

2.4 Prohibition of discrimination and respectful cooperation

Suppliers shall ensure equal treatment and refrain from any discrimination based on origin, skin colour, nationality, gender, sexual identity, religion, ideology, age, disability or other protected characteristics. Bullying, sexual harassment, psychological or physical violence and any form of degrading treatment are prohibited. The personal dignity, privacy, and personal rights of each individual shall be respected.

2.5 Freedom of association and collective negotiations

Workers have the right to form and join trade unions or workers' representatives of their choice and to engage in collective negotiations without discrimination or intimidation. Where legal restrictions exist, these shall be offset, to the extent legally permissible, by suitable alternative forms of employee representation.

2.6 Remuneration and working hours

Remuneration and benefits at least correspond to the applicable statutory or industry-wide minimum standards. ZEWOHERM also welcomes efforts to pay living wages. They are paid transparently and on time. Working hours, overtime, rest periods and holiday entitlements are governed by the relevant laws and ensure an appropriate limitation of the workload. Overtime is only permitted if it is performed voluntarily.

2.7 Occupational health and safety

Suppliers shall provide a safe and healthy working environment and comply with all relevant occupational health and safety regulations. Necessary precautionary measures shall be taken to avoid and minimise accidents and damage to health that may arise from work. This includes regularly informing and training employees about applicable health and safety standards and measures.

2.8 Use of security forces and forced evictions

Security forces must not be used in such a way that violates human rights, labour rights, or personal freedom. Unlawful forced evictions or expropriations of land, forests or waters are rejected.

3. Environmental and climate protection

3.1 Compliance with environmental law and management systems

Suppliers comply with all environmental laws, regulations and standards that apply to them and establish appropriate environmental management systems to identify, control and avoid environmental hazards or at least continuously reduce them. The use of resources and energy is monitored and optimized.

3.2 Resources, Energy and Emissions

The consumption of raw materials, water and energy must be minimised, energy efficiency must be continuously improved, and greenhouse gas, air and noise emissions must be monitored, treated, and, as far as economically possible, reduced. Suppliers promote climate-friendly technologies and products and integrate climate protection aspects into their processes.

3.3 Waste, wastewater and hazardous substances

Wastewater is classified, monitored, and, if necessary, treated before discharge, and its generation is reduced. Solid waste is identified, reduced, sorted, and responsibly disposed of or recycled. Export bans on hazardous waste must be observed. Chemicals and other hazardous substances are handled safely throughout their entire life cycle (transport, storage, use, recycling, disposal).

3.4 Conflict minerals and particularly hazardous substances

Suppliers shall take appropriate due diligence measures in accordance with the Organisation for Economic Cooperation and Development (OECD) Guidelines to avoid raw materials from conflict-affected and high-risk areas that contribute to human rights violations, corruption or the financing of armed groups. Persistent organic pollutants according to the Stockholm Convention as well as mercury and mercury compounds shall be excluded from supplied products or at least properly treated.

4. Ethical Business Conduct

4.1 Compliance with Laws

Suppliers comply with all relevant laws, in particular in the areas of competition and antitrust law, anti-corruption, anti-money laundering, foreign trade and export control law, taxes and data protection.

4.2 Anti-corruption and bribery

All forms of corruption, bribery, extortion, granting or accepting improper advantages are strictly prohibited. Gifts or invitations must not be in the form of cash or monetary benefits and must be transparent, occasional, and in accordance with applicable law. They must not be intended to influence business decisions.

4.3 Fair competition and antitrust law

Suppliers shall respect free and fair competition and shall not participate in price, market or bid agreements, market sharing or other anti-competitive practices. The abuse of dominant market positions is prohibited.

4.4 Money laundering and terrorist financing

Suppliers undertake to comply with all applicable national and international anti-money laundering laws. Money laundering and terrorist financing must be prevented and shall not be promoted directly or indirectly.

4.5 Conflicts of interest

Suppliers shall avoid personal or financial conflicts of interest that could influence business decisions and shall disclose unavoidable conflicts to ZEWOTHERM.

4.6 Protection of information, data and intellectual property

Confidential information, personal data as well as business and trade secrets of ZEWOTHERM and third parties must be protected and used only for the purposes agreed upon. Applicable data protection laws, including the GDPR, as well as intellectual property rights must be respected.

5. Supply chain due diligence

ZEWOTHERM expects suppliers to implement an appropriate risk management system, including regular risk analyses. Appropriate preventive and remedial measures are established within the company's own business and direct suppliers, and appropriate steps are taken if there are indications of violations further down the supply chain. The scope and depth of the measures depend on the individual risk profile of the supplier as well as the type and significance of the supply relationship.

6. Complaints and whistleblower system

ZEWOTHERM expects its suppliers to provide effective reporting channels through which their own employees and third parties can report violations of this code or relevant laws confidentially and without reprisals. No one may be disadvantaged on the basis of a report made in good faith. Alternatively, information can also be sent via the reporting channels set up by ZEWOTHERM.

7. Implementation, audits and sanctions

ZEWOTHERM may verify compliance with this Supplier Code of Conduct by taking appropriate measures such as self-disclosures, questionnaires, document reviews or on-site audits. The supplier agrees that ZEWOTHERM may conduct such audits to verify compliance with the code at the supplier's facilities during normal business hours after giving reasonable notice by persons appointed by ZEWOTHERM. The supplier may object to individual audit measures if they violate mandatory data protection regulations.

In the event of identified violations, ZEWOTHERM expects the supplier to immediately take appropriate corrective and preventive measures and document their implementation. Serious or repeated violations can result in the restriction or termination of the business relationship as well as further legal action.

8. Acceptance of the Supplier Code of Conduct

By signing this declaration, the supplier confirms that they have understood the requirements of this Supplier Code of Conduct, that they comply with them and that they will take appropriate steps to implement them throughout their supply chain. In the event of significant changes or new legal requirements, ZEWOTHERM will update the code and inform suppliers in good time.

Place

Date

Signature Supplier