

## Supplier Code of Conduct

SCHIRM GmbH, a group company of AECI Limited, is aware of its special responsibility for people and the environment as a globally active company. Our Code of Conduct takes this responsibility into account and defines the requirements for our own entrepreneurial actions.

We expect our suppliers<sup>1</sup> to comply with this Supplier Code of Conduct. It contains the values underlying our Code of Conduct. The careful observance of these values forms the basis for a trusting cooperation between the supplier and SCHIRM.

### **Purpose**

This Supplier Code of Conduct (hereinafter referred to as “Code”) supports our commitment to comply with national and international standards. These include labour and social standards, the ten principles of the Global Compact, the Universal Declaration of Human Rights, the International Covenant on Political and Civil Rights, the International Covenant on Economic, Social and Cultural Rights, the eight core labour standards of the International Labour Organization (ILO), the ILO Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration), the OECD Guidelines for Multinational Enterprises, and the Responsible Care® Global Charter.

### **Scope**

This Code defines our expectations of suppliers and the employees, bodies, suppliers and subcontractors engaged by suppliers. The supplier shall ensure compliance with this Code by third parties engaged by the supplier in an appropriate manner.

### **Compliance**

SCHIRM expects its suppliers to comply with all nationally and internationally applicable laws and regulations as well as the requirements of the Code in a responsible and consistent manner. SCHIRM reserves the right to verify compliance with the Code through internal or external audits after giving reasonable notice.

### **Acknowledgement**

By concluding a supplier or service contract and accepting an order from SCHIRM, the supplier acknowledges this Code.

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<sup>1</sup> “Supplier” includes all suppliers and service providers of SCHIRM GmbH

## Treatment of Employees

*"We expect our suppliers to comply with the eight core labour standards of the International Labour Organization (ILO).<sup>2</sup>"*

**The following points in particular must be taken into account:**

### **Child labour**

SCHIRM distances itself from child labour along the entire supply chain. Therefore, we also expect our suppliers to strictly prohibit child labour in their companies and in the companies of their subcontractors.

### **Forced labour**

The supplier is strictly prohibited from using forced labour in any form whatsoever in the supplier's company.

### **Equal treatment**

The supplier fights against discrimination in the workplace: No employee may be discriminated against, for example, on the grounds of gender, race, colour, origin, religion, age, disability, trade union or political affiliation, sexual orientation or marital status.

Freedom of association and collective bargaining

Our suppliers are expected to support the right to organise and collective bargaining.

### **Fair treatment**

Suppliers are expected to treat their employees fairly. Any form of sexual harassment, physical assault, coercion and bullying is prohibited.

### **Working hours, wages and salaries**

We expect our suppliers to provide employees with remuneration that is in accordance with the relevant laws and enables the full-time employee to secure an adequate living through his or her own income. Suppliers are expected to pay their employees on time. Pay cuts as a disciplinary measure are prohibited.

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<sup>2</sup> <http://www.ilo.org>

## Competitive behaviour

*"SCHIRM expects its suppliers to behave fairly in terms of competition and to act in a legally sound and compliant manner."*

This includes in particular the following principles:

### **Anti-corruption and unfair competition**

SCHIRM expects suppliers not to pay or accept bribes. Furthermore, the supplier shall not offer SCHIRM employees any socially unusual gifts or other benefits.

### **Antitrust law**

All suppliers shall ensure that they always comply with the respective relevant provisions of antitrust law.

SCHIRM also expects suppliers to expressly distance themselves from illegal practices that lead to the exclusion, distortion or restriction of competition.

In particular, the following actions with competitors are to be refrained from:

- Price or price-component fixing
- Agreements not to compete or the submission of sham bids
- Agreements regarding the sharing of markets or customers
- Exchange of secret market information (e.g. sales, prices, price calculations, planned investments, strategies or customer data)
- Unfair discrimination against customers or competitors.

Any exchange with competitors must take place under the aforementioned conditions.

### **Money laundering and violations of import and export bans**

SCHIRM does not tolerate money laundering or violations of import or export bans. Accordingly, we expect our suppliers to strictly comply with anti-money laundering laws and applicable import and export prohibitions.

### **Anti-terrorism funding**

SCHIRM expects its suppliers to avoid any contact with or support for terrorist organisations; if necessary, the supplier shall take appropriate internal measures that effectively prevent the financing of terrorism.

### **Transport of hazardous substances**

When handling dangerous goods, SCHIRM expects its suppliers to implement and comply with the relevant regulations for securing<sup>3</sup> dangerous goods. In compliance with, inter alia, any relevant security clearance legislation, suppliers shall employ reliable personnel trained for the job and vetted in accordance with the relevant applicable anti-terrorism regulations.

#### **Protection of confidential information**

Suppliers are expected to protect confidential information of business partners accordingly and to use it only for the purposes agreed under the contract.

#### **Conflicts of interest**

Our suppliers shall ensure that a conflict of interest between them and SCHIRM does not arise or is immediately eliminated and disclosed to SCHIRM.

## **Environment and safety**

*"Our suppliers are expected to protect our natural resources and to use them responsibly. Furthermore, they are expected to create a safe and healthy workplace for their employees."*

#### **Environmental protection**

SCHIRM expects its suppliers to use the raw materials, energy, water and other goods used in their activities as sparingly and purposefully as possible in order to contribute to environmentally friendly developments. Suppliers shall take all necessary measures to avoid environmental pollution. When disposing of solid waste or discharging waste water, the relevant laws must be observed.

#### **Occupational safety, accident prevention and health**

We expect our suppliers to comply with the legal regulations and the operational requirements concerning occupational health and safety, to protect the health of their employees and to ensure that accidents and work-related illnesses are prevented in all operational activities. Suppliers are expected to ensure the safety and control of the premises, plant, machinery, equipment and work processes as a top priority.

#### **Emergency management**

SCHIRM expects suppliers to implement an emergency concept that includes first aid measures, reporting and evacuation measures, emergency training and exercises as well as adequate fire protection and fire alarm systems.

## **Compliance by the supplier**

SCHIRM expects its suppliers to comply with the principles of this Code and considers any violation to be a material breach of contract.

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<sup>3</sup> "Securing" means the measures or precautions to be taken to minimise the theft or misuse of dangerous goods that may endanger persons, goods or the environment.