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## **I. Preliminary**

TROESTER GmbH & Co. KG is committed to contributing to sustainable development for the benefit of present and future generations. To this end, we identify, prevent, reduce and record negative impacts on the environment, human rights and governance through our own operational processes and our supply chain. We expect the same commitment from our suppliers and service providers.

We take responsibility for the economic, ecological and social impact of our actions. For this reason, TROESTER GmbH & Co. KG has prepared a Code of Conduct for Suppliers, which provides a guideline for responsible action. This Code of Conduct for Suppliers applies to our suppliers and service providers.

We do not only expect compliance with our Supplier Code of Conduct, but also an open attitude, allowing us to make a significant joint contribution to our sustainability goals:

- Creating circularity
- Protecting the climate
- Standing up for people
- Fair behavior

### **i. Management System**

We encourage our suppliers to continuously improve and establish, implement and maintain recognized management systems and standards related to the areas described in the Supplier Code of Conduct. Risk assessments, implemented policies, processes and programs, clearly communicated roles and responsibilities, appropriate training and instructions, the setting and evaluation of measurable objectives together with functioning control systems serve as the basis for the successful implementation of the Supplier Code of Conduct. Employees must have the right to report concerns regarding compliance with legal regulations or company guidelines/rules to their employer without fear of any reprisals.

### **ii. Implementation and Compliance**

TROESTER GmbH & Co. KG shall consider the scope and applicability of the requirements in relation to the nature of the supplier's business and the associated risks when assessing whether a supplier complies with the Supplier Code of Conduct. We may define additional supplier-specific sustainability requirements and goals in business agreements. If a supplier of TROESTER GmbH & Co. KG refuses to verify compliance with the Code of Conduct for Suppliers or fails to correct identified violations within a reasonable period of time, this shall constitute a material breach of the Code of Conduct for Suppliers. Consequently, TROESTER GmbH & Co. KG is entitled to terminate the business relationship with the supplier.

### **iii. Monitoring**

All business relationships between TROESTER GmbH & Co. KG and our suppliers must be based on honesty, trust and cooperation. By accepting the Supplier Code of Conduct, the supplier undertakes to comply with these requirements in its operations and supply chain. This should be achieved through transparent cooperation with TROESTER GmbH & Co. KG. Moreover, suppliers must be able to prove

their compliance with the requirements upon request. TROESTER GmbH & Co. KG may use discussions, self-assessment questionnaires or on-site audits to check whether the supplier complies with the requirements of the Supplier Code of Conduct. All audits or inspections carried out by TROESTER GmbH & Co. KG at the supplier's premises will be carried out in consultation with the supplier. Violations of the Supplier Code of Conduct must be reported to TROESTER GmbH & Co. KG shall be reported. TROESTER GmbH & Co. KG acts responsibly with all business and personal data received and ensures that this information is processed in accordance with moral and legal standards.

## **II. Compliance with Legal Regulations**

Suppliers must always be aware of and comply with national and regional laws as well as relevant and applicable international regulations and conventions related to the areas in the Supplier Code of Conduct. Suppliers must be able to recognize when a national regulation or its implementation violates international human rights standards and ensure that generally accepted human rights are respected. If the requirements of the Supplier Code of Conduct are more stringent than local laws, the requirements of the Supplier Code of Conduct shall prevail. In the event of actual or potential contradictions between the Code and applicable laws and regulations, suppliers must inform TROESTER GmbH & Co. KG about this.

## **III. Health and Safety**

Suppliers must provide a safe and healthy working environment and take all practicable measures to prevent incidents and injuries. Suppliers must take an appropriate, risk-based approach to health and safety, such as providing relevant instructions and training that are easily understood by all employees. Employees shall have the right to refuse a work situation if they have reasonable grounds to believe that it poses an immediate and serious risk to their health and safety. All work locations must be regularly inspected to ensure that fire safety and hygiene standards are always met.

## **IV. Human and Labor Rights**

Respect for human and labor rights plays an important role for TROESTER GmbH & Co. KG. This includes the fair, dignified and respectful treatment of employees. At the same time, it must be ensured that human and labor rights are not violated or infringements are not encouraged.

### **i. Human Rights Due Diligence**

Suppliers are required to consider the human rights impacts that they cause or contribute to, or that are directly linked to their operations, products and services, and take action to address them.

### **iv. Child Labor**

TROESTER GmbH & Co. KG does not tolerate any form of child labor. Suppliers are obliged to ensure that no child labor is used in their operations and supply chain and to ensure legally prescribed working

conditions for young employees. If child labor is detected, remedial action must be taken for the benefit of the child.

**v. Modern Slavery**

TROESTER GmbH & Co. KG does not tolerate any form of modern slavery, including forced labor, bonded or compulsory labor, servitude, recruitment under false pretenses, descent-based slavery and human trafficking. This does not only include all involuntary work, but also cases of coercion, psychological and/or physical threat or abuse, abuse of power and deception.

**vi. Discrimination, Coercion and Rough or Inhumane Treatment**

TROESTER GmbH & Co. KG does not tolerate discrimination in the workplace. Suppliers must respect the personal dignity, privacy and rights of every employee and must not tolerate verbal or non-verbal physical or psychological harassment or abuse. Suppliers shall prohibit behavior, language and physical contact viewed as sexual, coercive, threatening, violent or exploitative. Suppliers shall not unfairly discriminate in employment or during employment on the basis of age, nationality or ethnicity, religion, political beliefs, sexual orientation, gender identity or expression, physical ability or any other characteristic protected by law or ILO conventions, whether actively or through passive support.

**vii. Working Hours and Remuneration**

Reasonable working hours and fair remuneration are essential components of proper working conditions. Sufficient rest breaks and time away from work prevent injuries in the workplace and increase efficiency. As a minimum requirement, employees must be offered compensation and benefits in accordance with applicable laws or collective agreements. As a minimum requirement, employees must be offered remuneration and benefits in accordance with the relevant statutory regulations or applicable collective agreements. Suppliers are encouraged to provide working conditions that ensure a healthy work-life balance.

**viii. Freedom of Association and Collective Bargaining**

TROESTER GmbH & Co. KG promotes freedom of association and the right to lawful and peaceful association, organization and collective bargaining. We encourage suppliers to enter into dialog with their employees promoting and encouraging participation in the workplace. Suppliers shall recognize and respect the right of employees to freely associate, organize and bargain collectively in accordance with the laws in their countries of employment. Suppliers must allow employees to designate independent worker representatives and communicate openly with management about working conditions without fear of coercion, intimidation, penalties, negative influence or reprisals.

**ix. Acquisition of Land, Procurement of Resources and Use of Property**

Land and the right to property play an important role in eradicating poverty, income inequality and gender inequality. Furthermore, they contribute to food supply, peace and security. Suppliers must be legal owners or users of the land on which they conduct their business. Suppliers must avoid negative social, health, environmental or economic impacts resulting from the acquisition of land or the procurement of resources.

## V. Environment

Environmental protection, climate change mitigation and the creation of circularity are all important to TROESTER GmbH & Co. KG. The impact of business processes on the environment must be reduced to a minimum and the environmental footprint must be continuously improved. This includes the protection of biodiversity and ecosystems, the sustainable use of resources, the responsible ownership and acquisition of land and the responsible use of land. Suppliers shall introduce, implement and maintain risk assessments to reduce or minimize negative impacts on the environment caused by their activities, products and services. Suppliers must take preventative measures as soon as there is reason to believe that an action may be harmful to the environment or public health. Suppliers are required to monitor, measure, document and plan their work to minimize the environmental impact of their business, particularly in the following areas:

- Greenhouse gas emissions
- Circularity
- Chemicals and hazardous substances
- Waste
- Other emissions to air, water and soil
- Energy consumption
- Water consumption

TROESTER GmbH & Co. KG encourages suppliers to set targets to reduce the greenhouse gas effect as stipulated in the Paris Agreement. These targets should be based on scientific evidence.

## VI. Business Ethics

It is the aim of TROESTER GmbH & Co. KG to conduct business relationships with a high level of ethical integrity. This includes respecting competition law, protecting the right to privacy of individuals and complying with customs and export control regulations. We expect the same commitment from our suppliers.

### i. Anti-Corruption

Suppliers must comply with local laws and international anti-corruption conventions and may not participate in any form of corruption or cause TROESTER GmbH & Co. KG to be involved in it. Suppliers in no circumstances may offer valuables to TROESTER GmbH & Co. KG employees or third parties such as subcontractors or civil servants to influence them improperly. Suppliers must avoid any conflicts of interest during the collaboration and inform the company of any potential conflicts of interest that cannot be avoided. Suppliers must participate in the due diligence process of TROESTER GmbH & Co. KG's for suppliers and ensure transparency, quality and speed.

**ii. Competition Law**

Suppliers must always negotiate contracts in accordance with the principles of fair competition, regardless of the form of contract, and exercise the utmost diligence. Suppliers may not enter into any formal or informal contracts or agreements that serve to hinder or restrict competition or have the effect of doing so. In addition, no contracts or agreements may be concluded that violate applicable laws related to competition or fair trade.

**iii. Protection of Personal Data**

Suppliers are obliged to comply with all applicable personal data protection principles and use personal data only when lawful and necessary to fulfill legitimate business purposes.


**iv. Trade Compliance**

Suppliers must maintain and disclose accurate trade data and documentation related to their products. Suppliers must comply with locally applicable laws and international sanctions regulations and may not participate in or cause any form of sanctions violations that involve TROESTER GmbH & Co. KG itself.

Hannover, January 18, 2024



Management



Materials Management Division