

# Supplier Code of Conduct

Sustainability is a guiding principle for the use of resources and an integral part of Drei Bond GmbH's corporate strategy

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Reviewed by: QM	H. Wagner	2 September 2024	<i>H. Wagner</i>
Approved by:	H. Eicke	3 September 2024	<i>H. Eicke</i>

## 1. Introduction

The Code of Conduct for suppliers of Drei Bond GmbH is based on the same tried-and-tested fundamental principles of sustainability that are reflected in Drei Bond GmbH's internal processes. Engaging in an ongoing dialogue with our suppliers, we are committed to embracing the concept of sustainability and ensuring that our planet's resources are protected accordingly.

Drei Bond expects its suppliers to uphold sustainability principles in respect of e.g.:

- Ethics
- Treating employees
- Occupational health and safety, environmental protection and quality
- Management systems

and to communicate and/or demand compliance with such principles in their supply chains.

## 2. Ethics

We expect our suppliers to act ethically and with integrity in order to fulfil their responsibility to society.

Drei Bond GmbH expects its suppliers to avoid, prohibit and show zero tolerance of corruption, extortion, breaches of trust or embezzlement in any form whatsoever.

No bribes or other illegal payments are to be offered or accepted.

Neither do we expect any Drei Bond employees to be offered gifts or other gratuities for their own personal gain.

Drei Bond GmbH expects its suppliers to comply with international rules on equal rights and inclusion.

### Fair competition

We expect our suppliers to act fairly vis-à-vis their competitors and to comply with all applicable laws, regulations and requirements.

Protecting confidential information and intellectual property rights.

Our suppliers shall use and process confidential information appropriately and shall document and/or confirm that they will protect this information as required.

Establishing ways to report illegal conduct.

Drei Bond champions open communication and expects this of its suppliers as well. Suppliers' employees must have ways to report inappropriate conduct. All information received via these channels must be treated in confidence.

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### Conflict materials

Our suppliers are required to ensure that all materials supplied to us from the EU are authorised in accordance with the EU's REACH Regulation and can be processed.

Our suppliers shall work to prevent the direct or indirect funding of armed groups. Drei Bond supports the OECD's guiding principles for promoting responsible supply chains for conflict minerals. We expect our suppliers not to use illegal or unethical methods or means to obtain goods and materials for manufacturing their products and to provide us with sufficient information on conflict minerals in their supply chains.

### Complaints management

In the event of violations committed by Drei Bond employees (e.g. attempts at bribery by Drei Bond's Purchasing team), our suppliers are requested to notify Drei Bond's management accordingly without delay using an email address set up specifically for this purpose: [compliance@dreibond.de](mailto:compliance@dreibond.de).

These reports will be handled via a Drei Bond process established specifically for this purpose (Complaints Management).

### Protection against eviction and appropriation of land

Our suppliers undertake not to carry out any illegal evictions. They also undertake not to appropriate land, forests or bodies of water illegally by acquiring them, building on them or using them in any other way.

### Use of private and state security forces

Our suppliers undertake not to use any private or state security forces if, due to a lack of instruction or control on the company's part, there is a risk when using security forces of torture, of cruel, inhuman or degrading treatment, of injury to life or limb, or of restrictions to people's freedom of association or their freedom to form unions.

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### 3. Treating employees

All our suppliers should campaign for respect for human rights and should respect them themselves in accordance with the Universal Declaration of Human Rights.

#### Child labour

Suppliers of Drei Bond GmbH shall observe the ban on child labour, i.e. employing young people under 15 unless the statutory obligations impose any higher age limits.

#### Forced labour

We expect our suppliers to ban forced labour and slavery of any kind and to ensure that their employees are free to choose their own job.

#### Pay and working hours

Suppliers of Drei Bond GmbH shall comply with the employment standards governing pay in accordance with the applicable laws and provisions and with maximum working time limits.

#### Employees' rights

We expect our suppliers:

- to respect their employees' right to freedom of association, to the freedom to form unions and to engage in collective bargaining insofar as this is legal in the country concerned.
- to uphold women's rights in accordance with the relevant UN resolution (189 signatory countries (information correct as at 6 July 2020; current figure)).
- to uphold the rights of minorities, including indigenous peoples.

#### Fair treatment and ban on discrimination

All employees expect to be treated fairly, without any sexual harassment, sexual abuse, corporal punishment or torture, coercion or verbal abuse. We also expect equal opportunities for all employees – regardless of their background, gender, religion, disability, memberships, etc. – to be a key principle underlying the supplier's company policy.

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## 4. Occupational health and safety, environmental protection and quality

We expect our suppliers to foster a safe, secure and healthy atmosphere at work and to act in an environmentally sustainable, responsible and resource-friendly way. The quality of their products and company processes must be ensured.

### Occupational health and safety

Our suppliers are expected to provide their employees with a safe and secure environment in which to work. Appropriate checks and controls, safe and secure work processes, preventive maintenance and the necessary technical protective measures must ensure that employees can be protected against loss and damage.

### Quality requirements

We expect our suppliers to comply with generally accepted and/or contractually agreed quality requirements for products, processes and services and to provide the necessary resources and/or equipment in line with the work and quantities required.

### Product safety

All products purchased by Drei Bond GmbH must be supplied by our suppliers in line with our expectations and with the necessary safety-related documents (material safety data sheets, IDMS data, COAs, etc.). The use of counterfeit products is prohibited.

### Environmental and climate protection

We expect all suppliers to act with due environmental awareness and in line with environmental protection requirements and standards and to handle available natural resources responsibly.

The issues of soil quality, noise emissions, avoiding waste, reusing and recycling will be particularly important to you.

#### Our suppliers undertake:

- to avoid putting people and the environment at risk wherever possible in line with the precautionary principle and to protect the natural foundations of food production accordingly. The processes, premises and operating resources used by our business partners shall comply with the applicable statutory provisions and the principles of environmental protection.
- to introduce and continue to develop an environmental management system (EMS) or, as appropriate, to take measures to achieve the same objective as an EMS in accordance with ISO 14001 in a suitable manner. Climate protection
- to work towards sustainable and active climate protection, e.g. by increasing energy efficiency or by generating or using energy from sustainable sources. Suppliers are to ensure transparency regarding their carbon emissions and set ambitious targets for reducing CO<sub>2</sub>.
- to use water sparingly. Water intake is to be minimised, particularly in areas suffering water shortages, and access to drinking water and sanitary facilities is to be ensured. Wastewater quality standards are to be defined and monitored within the scope of applicable statutory and official regulations and when interpreting them. Air and soil quality
- to comply with the relevant statutory provisions and the regulations imposed by local authorities as a bare minimum.
- to reduce greenhouse gas emissions (e.g. by using electric vehicles, solar panels and 100% green electricity).
- to incorporate decarbonisation measures (e.g. when building or choosing new offices).

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- to introduce processes to reuse and recycle.
- to maintain soil quality via suitable protection mechanisms (drip pans, floor coverings, etc.).
- to comply with statutory provisions on noise emissions.
- to minimise any environmental impact of their business activities and use resources sparingly. Materials are to be reused wherever possible. Our business partners are to follow the “first avoidance, then recycling, then disposal” principle in handling waste.
- to comply with the relevant statutory provisions and official regulations as a bare minimum.

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## 5. Management system

You are expected to introduce management systems that support compliance with the applicable laws within your company and to bring about continuous improvement in the level of performance expected under this Code of Conduct.

### Statutory and other requirements

We expect compliance with the applicable laws, provisions and contractual agreements.

### Communication along supply chains

The principles enshrined in this Code of Conduct must also be communicated along the supplier's supply chain. Binding requirements made of Tier 1 suppliers are to be passed down the supply chain, and compliance with them is to be audited.

### Risk management

We expect our suppliers to introduce processes to ensure that risks can be identified across the board.

### Disclosure and information

The transposition of the EU's Digitalisation Directive into German law via the German Act Implementing the Digitalisation Directive (DiRuG) will introduce changes to the disclosure of accounting documents. In particular, new rules on the disclosure medium and the identification obligation have been agreed that parties subject to a disclosure obligation and their agents will need to bear in mind in the future.

### Counterfeit products and intellectual property

Intellectual property must be protected and any counterfeit products reported without delay.

### Continuous improvement

We expect our suppliers to take appropriate action to improve their sustainability performance on an ongoing basis.

### Training

We expect our suppliers to provide their management and other staff with instructions and training on sustainability issues. The training measures required to ensure a sufficient understanding of the contents of this Code of Conduct must be organised.

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## 6. Information security goals and requirements

As soon as a contractor or supplier gains access to confidential or secret information from Drei Bond and its customers, **information security requirements** must be complied with.

The basic protection goals of information security are defined as follows:

- Availability (authorized users have access to information and systems at all times),
- Confidentiality (confidential information is not disclosed to third parties without authorization or passed on) and
- Integrity (the information and the functioning of systems are correct).
- Compliance with the specified information security requirements is integrated into the supplier review process. This will be carried out at least annually.
- Access to confidential and secret information is secured.
- Subcontractors must be reported to Drei Bond and approved by them.
- Disclosure/transmission of confidential information is only permitted to the extent and in the manner authorized by Drei Bond.
- Information security incidents must be reported immediately to the ISB (Information Security Officer [isb@dreibond.de](mailto:isb@dreibond.de) / phone.: +49 173 7447278).

Please sign to confirm your compliance with this Code of Conduct.

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Place/Date

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Name/Job title

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Signature/Stamp

Company Drei Bond GmbH

Name: Christian Eicke, Managing Director  
Email: [einkauf@dreibond.de](mailto:einkauf@dreibond.de)

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