



# Code of Conduct for Suppliers

V-ZUG Group

13 March 2023



## 1. Purpose and scope

Ensuring compliance with laws and the sustainable procurement of goods and services from an ethical, economic, social and environmental perspective are fundamental principles of the procurement strategy of the V-ZUG Group (hereinafter “V-ZUG Group” or “V-ZUG”).

This Code of Conduct for Suppliers applies worldwide and defines the minimum expectations of the V-ZUG Group of its supplier businesses, the businesses supplying and subcontracting to the latter and their respective corporate bodies and employees (“Suppliers”).

This supplier code of conduct (“Code of Conduct for Suppliers”) is based on:

- the UN Universal Declaration of Human Rights
- the UN Conventions on the Rights of the Child
- the fundamental conventions of the ILO (“International Labour Organisation”)
- the principles of the United Nations’ Global Compact
- the OECD Guidelines for Multinational Enterprises
- the V-ZUG Code of Conduct (“Code of Conduct”)

The V-ZUG Group, its management and governing bodies and its employees adhere to the same principles and precepts in the course of their business activities, and the relevant Code of Conduct is available to the public on the website of the V-ZUG Group.

The V-ZUG Group communicates transparently and cooperates with partners and Suppliers to promote and enforce compliance with the precepts and principles of this Code of Conduct for Suppliers.

## 2. Precepts and principles

### 2.1 Compliance and integrity (governance)

- The Supplier undertakes to comply with all applicable laws, regulations and guidelines, to respect human rights and in particular to safeguard human dignity.
- The Supplier will conduct its business without bribery, corruption, money laundering or fraudulent behaviour of any type.
- The Supplier will disclose to V-ZUG any business incidents and situations that may constitute a conflict of interest.
- The Supplier will conduct its business in accordance with fair competition and consistent with the applicable statutory and relevant regulatory requirements in its country and the anti-trust and competition laws applying in the destination country. The Supplier will not misuse any position of market dominance.
- The Supplier undertakes to protect confidential information, only to use it appropriately and to ensure that the personal privacy of all employees and business partners and the applicable rights to intellectual property are protected.
- The Supplier undertakes to respect the applicable laws and regulations in the area of data protection.
- The Supplier may not use, without the prior written consent of V-ZUG, any name, brand or product of V-ZUG and the businesses associated with it in publicity or in advertising.
- The Supplier will respect and comply with the applicable export control, embargo and customs requirements and will make all necessary information available to V-ZUG with respect to fulfilling these requirements. The Supplier undertakes to disclose the origin and sources of supply of the raw materials used by it in order to exclude the use of raw materials such as conflict minerals and to identify these raw materials in manufactured products in the supply chain.

## 2.2 Labour law and human rights (**social**)

- The Supplier will not tolerate either harassment or discrimination of any type in the workplace, in particular not based on origin, race, nationality, gender, sexual orientation, age, religion or any other legally protected personal characteristic. The diversity of employees will be respected.
- V-ZUG does not tolerate forced labour or child labour in its business or those of its business partners.
- The Supplier is obliged to comply with applicable occupational health and safety at its sites.
- Breaches of the applicable national legislation and the agreed standards for working hours and the working environment of staff will not be tolerated.
- V-ZUG demands of its Suppliers that they are conscious of their social responsibility towards employees and that employees' remuneration is fair and adequate.
- The Supplier will respect and guarantee the freedom of assembly of all employees and the right to establish organisations of their own choosing and to join them, and to conduct collective bargaining pursuant to the ILO conventions.

## 2.3 Environment (**environmental**)

- V-ZUG expects of its Suppliers that they comply with applicable environmental laws both in respect of their business activities and the products and services offered.
- V-ZUG expects of its Suppliers that they reduce waste and emissions in the production process and that they control harmful emissions. The release of hazardous substances is to be avoided.
- Substances, the presence or release of which constitutes a hazard for people and the environment or impedes the recycling process, are to be avoided.
- The Supplier must ensure that all products supplied to V-ZUG accord with the applicable safety requirements.
- V-ZUG expects of its Suppliers that they actively analyse their own carbon footprint, and measure, report and reduce emissions. Open dialogue and an active search for common solutions to achieve reduction are desired.
- V-ZUG expects of its Suppliers that they plan their own energy supply as far as possible with renewable energy sources.
- V-ZUG expects of its Suppliers that the principles of the circular economy are applied wherever possible, and in particular that circular solutions should be worked on in collaboration with V-ZUG.

## 3. Quality management

- The Supplier is responsible for ensuring that the entire value chain is subject to adequate quality management.
- The Supplier will ensure the identification/tracing of the supplied products (e.g. in the event of a quality deficiency).

## 4. Implementation

It is important to V-ZUG to ensure sustainable development in the supply chain through compliance with these principles. The Supplier must develop, implement, apply and maintain management systems and controls in relation to the contents of this Code of Conduct for Suppliers. The Supplier must be able to demonstrate compliance with the principles of this Code of Conduct for Suppliers by means of specific documents. The Supplier will employ tools to regularly identify, evaluate and manage risks in all areas that come under this Code of Conduct for Suppliers.

## 5. Right to audit

V-ZUG reserves the right to carry out checks and audits at its Supplier businesses and to review compliance with this Code, in particular if there is justified suspicion that the precepts and principles listed here have been infringed. Upon request, Supplier businesses will make information available to V-ZUG that proves compliance with the Code. In particular, Supplier businesses should inform V-ZUG openly if aspects of this Code cannot, or can only partially, be fulfilled. The Supplier undertakes to provide information for the purpose of reviewing compliance with ESG requirements as part of self-audits.

## 6. Reporting point

If the Supplier or its employees suspects or has knowledge of breaches of regulations, laws or the V-ZUG Code of Conduct for Suppliers, these should be reported immediately to the following reporting point:

[compliance@vzug.com](mailto:compliance@vzug.com)

## 7. Breaches of the Code of Conduct for Suppliers

The Supplier signing this Code is solely responsible for complete compliance with this Code of Conduct for Suppliers by its executive staff, directors, managers, employees, representatives, and agents.

The principles and demands of this Code of Conduct for Suppliers are of fundamental significance for the business relationship between the V-ZUG Group and the Supplier. If the Supplier breaches individual principles and requirements of this Code of Conduct for Suppliers, V-ZUG reserves the right to demand remedial measures and/or to terminate the business relationship with the Supplier (without notice).

## 8. Final provisions

This Code of Conduct for Suppliers enters into force as of 13 March 2023. The Code of Conduct for Suppliers is available in various languages. In the event of discrepancies between the various language versions, the German version is authoritative.

Zug, 13 March 2023

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