

Supplier Code of Conduct of the Kludi Group

1. PREAMBLE

The Kludi Group and its employees recognize their social responsibility. All laws are observed, and ethically correct action is taken in all matters. In particular, all those involved in the procurement process bear responsibility towards their own company, customers and suppliers, the environment and society. We expect the same from our suppliers. This Code of Conduct is intended to emphasize Kludi's fair, sustainable, responsible and ethical principles of action. The Supplier Code of Conduct is the basis for all business relationships between Kludi and its suppliers and is an integral part of Kludi's General Terms and Conditions of Purchase, which govern all orders.

2. GENERAL PRINCIPLES

In all business activities involving cooperation with Kludi, the supplier undertakes to fulfil its social responsibility and to comply with the applicable laws and other relevant provisions of the countries in which services are provided / supplied to the Kludi Group.

3. ECONOMIC ASPECTS

3.1 Corruption

In our dealings with our business partners, the interests of the companies and the private interests of employees on both sides are strictly separated. Actions and (purchasing) decisions are made free of extraneous considerations and personal interests.

Consequently, employees should not enter into a financial or other relationship with a supplier that affects the employee's obligation (to act in KLUDI's interest). The responsibility for disclosing the private relationship lies with the supplier. In business dealings, no monetary personal benefits, gifts, payments, invitations or services are offered or promised with the intention of improperly influencing a business relationship. This is generally not the case for gifts and invitations that are within the scope of customary business hospitality and courtesy. Cash and cash equivalents, such as vouchers, are generally not accepted.

The rules described above also apply to the sending of gifts or other gifts sent to an employee's home address.

3.2 Antitrust law / conduct towards competitors

Applicable laws that protect and promote fair competition, in particular the applicable antitrust laws and other laws regulating competition, will be observed.

4. SUPPLY CHAIN

4.1 Use of conflict commodities

In accordance with the "Dodd-Frank Act", which came into force in the USA to prevent conflict commodities in the supply chain, the materials concerned, such as tantalum, tungsten, tin and gold, must not be sourced from the Democratic Republic of the Congo and its surrounding states. The supplier is obliged to observe the corresponding regulations and to transfer them to its supply chain.

4.2 Extension of the code of conduct to the supplier's supply chain

The supplier is obliged to implement compliance with the contents of this Code of Conduct also towards its suppliers.

5. SOCIAL ASPECTS

5.1 Human rights

Compliance with internationally recognized human rights is respected and supported.

5.2 Forced labour

Any form of forced labour is rejected.

5.3 Child labour

The regulations of the United Nations on human and children's rights are observed, in particular the Convention on the Minimum Age for Admission to Employment and the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (ILO Conventions 138 and 182). If a national regulation concerning child labour provides for stricter standards, these shall be observed as a matter of priority.

5.4 Living wages

The supplier pays its employees appropriately and guarantees legally or collectively agreed minimum wages or wages customary in the industry. Each employee shall be able to cover the basic needs of the employee's nuclear family and, in addition, have a freely disposable income. The supplier shall grant the employee the social benefits to which the employee is entitled by law. The employer shall make the remuneration transparent. The remuneration shall be made regularly and in legal tender. Illegal and unauthorized deductions from wages as well as deductions as disciplinary measures are not permitted (ILO Conventions 26, 131).

5.5 Discrimination

Any form of discrimination is countered within the framework of the respective applicable rights and laws. This refers in particular to discrimination against employees based on gender, race, disability, ethnic or cultural origin, religion or ideology, age or sexual orientation. Equal opportunities must be maintained in recruitment, employment and remuneration. Fair treatment, respect, tolerance and diversity are encouraged.

5.6 Health protection

Occupational safety and health protection are ensured in the workplace within the framework of national regulations. Continuous development to improve the working environment is supported. The supplier must introduce occupational safety and health policies and procedures and disclose them to its employees, thereby reducing or preventing accidents and occupational diseases (ILO Conventions 155, Recommendation 164, 190).

5.7 Fair working conditions

The right to freedom of association of employees within the framework of the respective applicable rights and laws shall be observed. The supplier must not punish employees physically or psychologically in any form. This applies in particular if employees report company practices in good faith that violate national, international or internal regulations.

6. ENVIRONMENTAL PROTECTION

We are committed to sustainable environmental protection for the present generation and future generations. The supplier's products and services must not endanger people or the environment and must comply with the agreed or legally prescribed standards regarding product safety. Laws enacted for the protection of the environment are to be observed and environmentally conscious actions of employees are to be promoted.

6.1 Careful use of resources

The supplier shall reduce the consumption of raw materials to a minimum in every business activity. In particular, the supplier shall pay attention to the economical use of energy and water. The use of renewable resources shall be preferred if possible. Suppliers are encouraged to strive for the latest technical standards to achieve the best possible resource efficiency. Alternatives to the technical solutions previously used by Kludi will be offered by the supplier without being prompted to do so.

6.2 Avoidance and reduction of environmental pollution

The supplier shall reduce any emissions to a minimum in a state-of-the-art manner. The supplier monitors polluting emissions and treats them before they are released into the environment. The supplier should avoid or recycle waste as far as possible. Materials used should be reused if possible. The supplier shall develop procedures to regulate the transportation, storage, as well as safe and environmentally friendly treatment and disposal of waste. Substances posing a risk to people and the environment through release shall be avoided wherever possible. The supplier shall also implement a hazardous substance management system ensuring safe use and transport as well as safe storage, reprocessing, reuse and disposal.

6.3 Environmentally friendly products

When developing products and services, the supplier shall ensure that using such products and services is economical in consuming energy and natural resources. The products should still be suitable for reuse, recycling or safe disposal.

6.4 Management systems

The supplier shall implement management systems ensuring compliance with the principles listed here and certify them according to recognized standards. Kludi will give preference to suppliers actively operating a quality management system in accordance with ISO 9001, an environmental management system in accordance with ISO 14001, an energy management system in accordance with 50001, and OHSAS 18001 for occupational safety or equivalent systems. A management system for social responsibility based on SA8000 specifications is recommended.

7. IMPLEMENTATION

Upon request, the supplier shall provide KLUDI with all necessary correct and comprehensive information for an initial appraisal as part of a self-assessment. The supplier shall also provide other information demonstrating compliance with the Supplier Code of Conduct. Kludi will monitor that these guidelines are implemented.

The supplier must inform us of any events conflicting with the principles of the Supplier Code of Conduct. KLUDI reserves the right to demand remedial action in the event of non-compliance and, if necessary, to terminate the cooperation.

Confirmation and legally binding signatures:

Place, date

Signature, stamp

Name (block letters)