

## **Supplier Code of Conduct HUBER+SUHNER**

**Important notice:** This document contains the H+S Supplier Code of Conduct. In case of any dispute, the English wording shall prevail.

You are required to print the entire H+S Supplier Code of Conduct, add your company name, as well as the names, roles, places, dates, and signatures. Then return the document to HUBER+SUHNER.

## Supplier Code of Conduct

### 1.1 Purpose and scope

At the heart of the business of HUBER+SUHNER lies the aspiration to satisfy some basic human needs such as the abilities to communicate, to be mobile, to feel safe, and to act sustainably. Therefore, HUBER+SUHNER has set sustainability as an integral part of the business and commits itself to responsible and sustainable operation and development in all business activities according to the “HUBER+SUHNER Code of Responsible Business Conduct”. This document highlights important standards that are consistent with our HUBER+SUHNER principles and which we expect each supplier to observe and strictly adhere to.

The HUBER+SUHNER supplier code of conduct is therefore an integral part of the agreement between supplier and HUBER+SUHNER and applies to all suppliers worldwide that deliver goods and/or services to any entity of the HUBER+SUHNER Group, including their parent, subsidiary or affiliate entities as well as their respective employees and agents.

### 1.2 Legal compliance as a prerequisite

Suppliers shall comply with all applicable laws, rules and regulations in the countries in which they operate and will maintain suitable measures to ensure compliance with such laws, rules and legal regulations.

### 1.3 Human rights and labor practices

HUBER+SUHNER fully respects human rights within its sphere of influence. In particular we are expecting the following also from our suppliers:

#### a) Equal and non-discriminatory treatment

Employees shall be selected, employed and supported on the basis of their qualifications and capabilities. Suppliers shall not practice any form of discrimination based on gender, age, religion or other belief, caste, social background, disability, ethnic, national or territorial origin, nationality, trade union membership or membership in any other legitimated organization, political affiliation or opinion, sexual orientation, gender identity or expression, family responsibility, marital status, disease, pregnancy, or other conditions that could give rise to discrimination.

#### b) Protection against harassment

Suppliers shall commit to a workplace free of harassment and shall foster a social environment with respect for the individual. Suppliers shall ensure that employees are not subject to any physical or psychological inhumane treatment, corporal punishments, threats or false promises.

#### c) Forced or compulsory labor

Suppliers shall ensure that they do not engage in any form of forced, bonded, compulsory, trafficked, modern slavery or non-voluntary labor. Suppliers are expected to work proactively against forced labor and act with special carefulness when recruiting migrant workers, both directly and indirectly.

Employees shall never be required to pay the supplier or agent any fees or cost for uniforms, personal protective equipment or other expenses needed to obtain and retain employment.

Suppliers shall provide all employees with a written contract in a language understood by them. The content should also be explained verbally in clear and understandable terms. The contract shall clearly state the voluntary nature of employment and procedures of leaving the job. Suppliers shall only employ workers who are legally allowed to work in the receiving country.

**d) Child labor and young workers**

HUBER+SUHNER does not tolerate any form of forced or compulsory labor and expects suppliers to uphold the same standards and not engage in any form of child labor. According to [ILO](#), child labor is “defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children and/or interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.”

**e) Compensation and working hours**

Suppliers shall always pay and provide its employees' wages and benefits that, as a minimum, comply with applicable laws and collective bargaining agreements. Suppliers shall provide their employees with information about their employment terms and conditions, including benefits, in a format and language they can easily be understood, such as a written employment contract and a timely wage statement. Deduction from wages is permitted only if and to the extent prescribed by applicable law, regulations or collective bargaining agreements.

Suppliers shall always respect and comply with applicable laws and collective bargaining agreements, if applicable, on working and resting hours, including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations.

**f) Trade unions and collective bargaining**

Suppliers shall respect the fundamental right and choice of all employees to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities. Employees shall have the right to openly share concerns with management regarding safety, working conditions, management practices, etc.

## **1.4 Occupational health and safety**

Similar to HUBER+SUHNER, the health and safety of employees shall have top priority at our suppliers.

### **a) Safety hazard prevention**

Suppliers shall ensure that their employees' potential exposure to safety hazards, such as machines, equipment or substances, are identified, assessed and controlled through proper design and/or preventative maintenance and safe work procedures. Where hazards cannot be adequately controlled by these means, employees shall be provided with appropriate personal protective equipment. Safety information shall be made available to everyone in order to educate, train, and protect the employees from safety hazards.

In addition, suppliers shall regularly assess potential emergencies and shall be prepared to implement contingency plans in case of business interruptions.

### **b) Facilities and workplace ergonomics**

Employees shall have ready access to clean drinking water, hygienic sanitary facilities, hygienic food preparation, storage and eating facilities, adequate ventilation, light and temperature levels, and acceptable levels of noise and dust pollution. In addition, supplier shall identify ergonomic working environment risks and evaluate employee exposure. Concerned employees should be involved when designing or redesigning workplaces.

## **1.5 Responsible sourcing of minerals**

Suppliers shall implement due diligence processes in order to identify, prevent and mitigate risks for negative human rights and environmental impacts in their supply chains, including appropriate grievance mechanisms and reporting, based on the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises and respective guidelines.

Suppliers are expected to support due diligence and traceability throughout their supply chains for all minerals. Suppliers shall be aware of applicable legal requirements in relation to minerals from conflict-affected and high-risk areas and shall ensure compliance with such laws, in line with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas".

Thereby, suppliers shall perform due diligence on their supply chains to determine whether products or components sold to HUBER+SUHNER contain critical minerals or materials. Suppliers shall complete the most recent versions of the relevant reporting templates such as "Conflict Minerals Reporting Template" (CMRT) and "Extended Minerals Reporting Template" (EMRT) provided by the "Responsible Minerals Initiative" (RMI) based on accurate and truthful information from the suppliers' sub-suppliers, be ready to provide current and updated information such as CMRTs EMRT to HUBER+SUHNER and work towards eliminating non-conformant smelters in their respective supply chains.

## **1.6 The environment**

HUBER+SUHNER expects its suppliers to reduce their negative environmental impacts by protecting the environment, conserving natural resources and continuously striving towards reducing the environmental footprint of their production, components, products and services throughout their entire life-cycle.

**a) Resource efficiency and energy consumption**

Suppliers shall control and implement actions taken to reduce the use of energy, water, raw materials and packaging materials. The energy used in the supplier's facilities should originate from fossil free energy sources.

**b) Emissions and waste handling**

Suppliers shall control and implement actions taken to reduce emissions to air. Suppliers shall implement systematic waste handling management for wastewater, hazardous and non-hazardous waste. Oils, chemicals and other hazardous waste shall be kept separated from other waste and handled to avoid leakage into air, water or soil. Waste should be sorted to be re-used or recycled. Landfill deposits should always be avoided.

**c) Climate change mitigation**

Suppliers shall develop and implement plans and targets to reduce their carbon footprint across all of their production network, supply chain, products, components and services. Suppliers should quantify and report meaningful ESG metrics following established methodologies like the Greenhouse Gas Protocol, Global Logistics Emissions Council Framework, World Business Council for Sustainable Development Pathfinder Framework, and the Global Reporting Index that they can continually measure over time.

Furthermore, HUBER+SUHNER recommends that suppliers publicly disclose their ESG metrics and goals via sustainability platforms such as IntegrityNext, beginning with the key climate metrics of annual scope 1, 2 and 3 carbon emissions and product carbon footprints.

**1.7 Fair operating practices**

HUBER+SUHNER requires its suppliers to uphold the highest standards of integrity and always operate honestly and equitably throughout their operations and business relationships. HUBER+SUHNER believes that earning business fairly and in compliance with applicable legal requirements is essential to build trust with customers and other business partners. We require our suppliers to conduct their business in the same way, especially in the following areas.

**a) Anti-corruption and conflicts of interest**

Suppliers shall assure zero tolerance for any form of bribery, corruption, or money laundering. This means that suppliers do not engage in offering or accepting any kind of incentive, kickback, gratuity, gift or other unlawful favor with the intention to receive favorable treatment by HUBER+SUHNER or obtain/retain HUBER+SUHNER business. In addition, suppliers have internal rules in place prohibiting bribery and corruption and provide regular training to its staff to assure compliance.

HUBER+SUHNER employees are expected to act in the best interest of HUBER+SUHNER. Private interests and personal consideration shall not affect any business decision. HUBER+SUHNER as well as the supplier will avoid any activity or situation which may lead to a conflict of a private interest of a HUBER+SUHNER employee with a supplier and the business interest of HUBER+SUHNER. A supplier becoming aware of a conflict of interest situation will immediately notify HUBER+SUHNER about this.

**b) Fair competition and antitrust law**

HUBER+SUHNER requires its suppliers to comply with valid and applicable competition and antitrust laws. In particular, suppliers shall not conclude anti-competitive agreements with competitors, suppliers, customers or other third parties and will not abuse a dominant market position.

**c) Trade compliance**

Suppliers shall comply with all applicable government export control and customs regulations as well as trade restrictions and embargoes and shall not facilitate the bypassing of such regulations.

**d) Intellectual property and data protection**

Suppliers shall protect HUBER+SUHNER confidential information, including personal information, and act to prevent its misuse, theft, fraud or improper disclosure and shall comply with all applicable data privacy laws. Suppliers shall safeguard and respect HUBER+SUHNER intellectual property. Suppliers shall take all due care in handling, discussing or transmitting sensitive or confidential information that could affect HUBER+SUHNER, its employees, its customers, the business community or the general public. Any confidential information and/or licensed intellectual property shall only be used for the intended and designated purpose.

In addition, suppliers should have a proper level of cybersecurity in their IT systems to avoid and mitigate potential cyber risk. Suppliers should perform periodic cybersecurity risks and vulnerability assessments, incl. the use of qualified cybersecurity professionals as appropriate. There should be an established and updated business continuity plan and cybersecurity continuity plan, specifying the implemented controls and security, a communication plan, and a robust recovery program.

**1.8 Implementation and compliance**

HUBER+SUHNER expects suppliers to implement systems and controls to promote compliance with applicable laws and the principles set forth in this supplier code, including policies, training, monitoring, and auditing mechanisms. Suppliers are also expected to inform their employees of the principles set forth in this supplier code.

Suppliers shall apply these or similar principles to their sub-suppliers and subcontractors they work with in providing goods and services to HUBER+SUHNER.

Compliance with this Supplier Code of Conduct is a key indicator in the HUBER+SUHNER supplier qualification, risk assessment and rating process. Suppliers' acknowledgment and explicit agreement of the Supplier Code of Conduct is a prerequisite for doing business with us. HUBER+SUHNER verifies compliance with the requirements of this supplier code of conduct by means of a self-assessment questionnaire via the IntegrityNext platform and reserves the right to conduct an on-site audit scheduled at business hours mutually agreed with the supplier.

Lack of cooperation, failure to address violations of the requirements of this supplier code of conduct and/or non-timely implementation of necessary corrective action plans may result in a reduction in business and, ultimately, an end to the business relationship with HUBER+SUHNER.

## 1.9 Grievance and complaints mechanism

The supplier and its respective employees as well as stakeholders and rights-holders in general are encouraged to report violations of this supplier code to the HUBER+SUHNER Compliance and Anti-Corruption Hotline. Contact details are available on the HUBER+SUHNER website ([www.hubersuhner.com](http://www.hubersuhner.com)).

Suppliers shall support any investigations into alleged violations. Additionally, in line with their own due diligence efforts, suppliers should provide grievance/complaints mechanisms or support respective sector or country specific non-judicial mechanisms.

### Declaration of the Supplier:

We hereby confirm that we commit ourselves to comply with the principles and requirements stated in the "HUBER+SUHNER Supplier Code of Conduct". We further confirm to inform our employees in an appropriate manner about the existence of and access to the whistleblowing platform [SpeakUp](#).

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Company Name

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Place, Date

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Name (BLOCK CAPITALS), Function

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Signature

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Name (BLOCK CAPITALS), Function

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Signature

This document must be signed by authorized representatives of the company.