

Supplier Code of Conduct

vandaglas AG | 1st February 2025

As a company committed to ethical and sustainable business practices, we recognize our responsibility to uphold human rights, protect the environment, and promote fair working conditions throughout our supply chain. This Supplier Code of Conduct outlines the principles and requirements we expect from our suppliers and their subcontractors. Compliance with these standards is a prerequisite for collaborating with our company.

1. compliance with laws and regulations

Suppliers must comply with all applicable national and international laws, regulations, and standards in the countries where they operate. This includes adherence to the Universal Declaration of Human Rights by the United Nations, the conventions of the International Labour Organization (ILO), and relevant frameworks such as the German Supply Chain Due Diligence Act (LkSG).

2. prohibition of corruption and bribery

Suppliers must not tolerate or engage in any form of corruption, bribery, extortion, or embezzlement. Business decisions must be based on transparent and fair criteria, free from undue influence.

3. respect for human rights

Suppliers must uphold internationally recognized human rights. This includes:

- Prohibiting all forms of forced or compulsory labour.
- Ensuring that all employees meet the minimum legal working age, with exceptions as stipulated under ILO Convention No. 138.
- Protecting employees under the age of 18 from hazardous work and ensuring that their working hours align with educational requirements.
- Prohibiting discrimination against employees based on race, colour, religion, gender, age, disability, nationality, ethnic origin, or sexual orientation.
- Employees must not be subject to physical punishment or any form of physical, psychological, verbal, or sexual harassment. The personal dignity of each individual must be respected.

4. fair working conditions

suppliers must:

- Adhere to applicable laws on working hours, wages and social benefits.
- Pay at least the legally mandated minimum wage.
- Provide paid leave and statutory holidays in accordance with legal requirements.

5. health, safety and environmental protection

Suppliers are responsible for providing a safe and health-promoting working environment and must:

- Comply with applicable health and safety regulations.
- Implement measures to prevent workplace accidents and injuries.
- Minimize environmental impacts, use resources efficiently and prevent pollution.
- Apply practices to continuously improve environmental performance, including alignment with international standards such as ISO 14001.

6. freedom of association and collective bargaining

Suppliers must respect the rights of employees to freedom of association, union membership, and collective bargaining, in accordance with local laws and international standards.

7. fair competition and compliance with antitrust laws

Suppliers must uphold the principles of fair competition and comply with all applicable antitrust and competition laws. Suppliers must not engage in anti-competitive practices such as price-fixing or market allocation.

8. data protection and confidentiality

Suppliers must protect the confidentiality of business information, intellectual property, and personal data obtained through their business relationship with our company. They must comply with applicable data protection laws and implement measures to prevent unauthorized access or disclosure.

9. supply chain responsibility

Suppliers must communicate the principles of this Supplier Code of Conduct to their own suppliers and subcontractors and take appropriate steps to ensure compliance throughout the supply chain. Suppliers must conduct due diligence to identify, prevent, and mitigate adverse impacts on human

rights and the environment within their operations and supply chains.

10. grievance mechanisms and reporting

Suppliers must establish grievance mechanisms that enable employees and other stakeholders to report concerns regarding non-compliance with this Code of Conduct. Suppliers are encouraged to report violations or risks either directly to the designated points of contact within our company or through the established reporting channels.

11. monitoring and audits

We reserve the right to monitor and evaluate suppliers' compliance with this Supplier Code of Conduct. This may include on-site audits, review of relevant documentation, and employee interviews. Violations may result in corrective actions, contract termination, or other necessary consequences.

12. commitment to continuous improvement

Suppliers are encouraged to continuously improve their practices in line with the principles outlined in this Code of Conduct. Collaboration with our company to address challenges and implement improvements is expressly welcomed.

By signing this document, the supplier acknowledges their understanding and commitment to adhering to the principles outlined in this Supplier Code of Conduct of vandaglas AG.

date: _____

supplier name: _____

signature: _____

