



# **SAACKE Code of Conduct supplier and business partner**

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### FOREWORD

SAACKE is a global enterprise with a long tradition. Being this kind of a company means SAACKE has a responsibility as a corporation to customers, employees, investors, the public, and the environment. This corporate responsibility includes compliance with the laws in force everywhere and at all times as well as respecting ethical values and acting sustainably.

By acceding to the United Nations' Global Compact, SAACKE has undertaken to observe its ten principles in the areas of human rights, labor, environmental protection, and anti-corruption. Furthermore, SAACKE meets the labor standards laid down in the Conventions of the International Labor Organization (ILO). SAACKE has also set itself binding guidelines in its Code of Conduct for acting responsibly.

### 1. SCOPE OF APPLICATION

In line with the corporate responsibility strategy pursued by SAACKE, the Company expects its suppliers (i.e. all contracting parties that supply SAACKE with goods, materials, or services) and business partners (including business partners with an intermediary and/or representative function that act in the interests or on behalf of SAACKE in a sales support capacity, such as consultants, agents, trading representatives, authorized dealers/importers, joint venture and syndicate partners, etc.) and their employees to act responsibly and undertake to observe the basic principles outlined in this SAACKE Supplier and Business Partner Code of Conduct.

If the suppliers or business partners commission third parties (e.g. subcontractors or representatives) in their business dealings with SAACKE, SAACKE expects these third parties to also observe the principles laid down in this SAACKE Supplier and Business Partner Code of Conduct.

SAACKE reserves the right to send experts to inspect the business premises of its suppliers and business partners for compliance with the requirements listed below on a case-by-case basis. Advance warning will be given of such inspection, which will take place during normal business hours in the presence of a representative from the supplier or business partner and in compliance with the applicable law, particularly with data protection laws.

### 2. CORPORATE RESPONSIBILITY

Corporate responsibility involves a duty to comply with all rules and regulations in force. SAACKE expects its suppliers and business partners to especially observe the basic principles that follow.

#### Human rights

SAACKE suppliers and business partners respect and protect the regulations in force worldwide to protect human rights as a fundamental and general requirement. This also involves SAACKE suppliers and business partners refraining from employing forced or child labor. Suppliers and business partners comply with the rules laid down in ILO Conventions 138 and 182 concerning the minimum age of employment for children.

### **Equal opportunity and non-discrimination**

SAACKE suppliers and business partners do not discriminate on grounds of ethnic, national, or social origin, skin color, sex, religion, views, age, disability, sexual orientation, political views insofar as they are based on democratic principles and tolerance toward those of a different opinion, or any other legally protected characteristics unless mandatory applicable law requires otherwise.

### **Freedom of association**

The basic right of all employees to form trade unions and employee representations and to join them is recognized. In countries where this right is restricted by local laws, alternative legitimate options for employee participation are to be supported.

### **Product safety**

SAACKE suppliers and business partners comply with all applicable legal product safety regulations and requirements, particularly legal requirements pertaining to the safety, labeling, and packaging of products as well as the use of dangerous substances and materials.

### **Safety in the workplace and working hours**

SAACKE suppliers and business partners comply with the relevant legal regulations for health and safety in the workplace. They support the further development and improvement of working conditions. Working hours correspond at least to the respective national legal standards or the minimum standards of the respective national economic sectors.

### **Minimum wage**

SAACKE suppliers and business partners ensure that their employees are commensurately remunerated corresponding at the very least to the legally valid and guaranteed minimum. Where legal or collective bargaining agreements do not exist, compensation and benefits are based on industry-specific collective agreements customary to the respective location that ensure an appropriate standard of living for the employees and their families.

## **3. ENVIRONMENTAL AND CLIMATE PROTECTION**

SAACKE wants to make a significant contribution to environmental and climate protection. SAACKE expects its suppliers and business partners to especially observe the basic principles that follow.

### **Compliance with legal provisions**

SAACKE suppliers and business partners take responsibility when it comes to environmental protection concerns and comply with all applicable legislation relating to the environment and sustainability.

### **Increase energy and resource efficiency**

SAACKE suppliers and business partners use natural resources sparingly and minimize environmental pollution in their production processes and products. They contribute to reducing energy consumption and CO2 emissions.

### **Implementation and application of environmental management systems**

SAACKE suppliers and business partners continuously improve their environmental performance. Suppliers and business partners with production sites implement suitable environmental management systems (e.g. in accordance with ISO 14001 or the EMAS Directive of the European Union).

## **4. TRANSPARENT BUSINESS RELATIONSHIPS**

Openness and transparency are key to credibility and trust in business practice. SAACKE expects suppliers and business partners to especially observe the basic principles that follow:

### **Avoiding conflicts of interest**

SAACKE suppliers and business partners take decisions based solely on objective criteria and do not allow themselves to be guided by personal interests or relationships.

### **Prohibition of corruption**

SAACKE suppliers and business partners do not tolerate corruption. They ensure that their employees, subcontractors or representatives do not grant, offer or accept any bribes, kickbacks, inadmissible donations, or other inadmissible payments or benefits to or by customers, officials or other third parties. This also applies to so-called "facilitation payments" (e.g. illegal payments to accelerate administration matters that are routinely encountered).

### **Gifts, hospitality, and invitations**

SAACKE suppliers and business partners do not offer SAACKE employees or third parties any inappropriate benefits either directly or indirectly in the form of gifts, hospitality, or invitations to unduly influence them. Neither do they ask for, nor accept such benefits.

### **States as customers and dealing with authorities**

SAACKE suppliers and business partners consistently comply with the strict legal provisions when dealing with governments, authorities, and public institutions. When taking part in a public solicitation for bids, they comply with legal regulations and abide by the rules of free and fair competition.

### **Consultants and agents**

SAACKE suppliers and business partners only employ consultants or agents in line with the laws in force. They take particular care to ensure that consultants or agents are only remunerated for consulting and agency services actually rendered and that the payments are commensurate with the performance rendered.

#### 5. FAIR MARKET CONDUCT

SAACKE is a fair and responsible market participant and adheres to its contractual obligations. SAACKE also expects the same from its suppliers and business partners and especially expects them to observe the basic principles that follow.

##### **Free competition**

SAACKE suppliers and business partners comply with the antitrust legislation in force. In particular, they do not enter into any anti-competitive agreements with competitors, suppliers, or customers. If they are in a dominant position on the market, they do not abuse this position.

##### **Export control**

SAACKE suppliers and business partners make sure that they comply with all applicable legal provisions for importing and exporting goods, services, and information.

##### **Money laundering**

SAACKE suppliers and business partners only conduct business relationships with business partners of whose integrity they are convinced. They ensure that the applicable legal money laundering provisions are not breached.

##### **Business information**

SAACKE suppliers and business partners publish business information and report on their business activities truthfully and in line with the laws in force.

#### 6. PROTECTION OF DATA, BUSINESS SECRETS, AND COMPANY ASSETS

Confidential data, business secrets, and company assets have to be protected. SAACKE expects suppliers and business partners to especially observe the basic principles that follow.

##### **Data protection**

SAACKE suppliers and business partners observe all laws in force to protect the personal data of employees, customers, suppliers, and other parties concerned.

##### **Protection of know-how, patents, trade and business secrets**

SAACKE suppliers and business partners respect the knowhow, patents, trade and business secrets of SAACKE and third parties and do not pass such information on to third parties without the express prior written consent of SAACKE or in a way that is otherwise inadmissible.

### **Handling company assets**

SAACKE suppliers and business partners respect SAACKE's tangible and intangible assets and do not use them for unfair or non-business purposes. They ensure that their employees as well as any third parties they commission in the business relationship (such as subcontractors or representatives) neither damage nor misuse SAACKE assets, i.e. use these assets contrary to SAACKE's interests.

### **Security of the international supply chain**

SAACKE suppliers and business partners have to ensure that the business premises and the loading and shipping areas where products for SAACKE are produced, stored, prepared, loaded and transported, are protected against unauthorized access within a safe and secure supply chain, and that all employed staff is reliable.

## **7. LEGAL CONSEQUENCES OF VIOLATING THE SAACKE SUPPLIER AND BUSINESS PARTNER CODE OF CONDUCT**

If a SAACKE supplier or business partner does not observe the basic principles laid down in this Code of Conduct, SAACKE is entitled to terminate the business relationship with this supplier or business partner for cause. It is within the discretion of SAACKE to forgo such consequences and, instead, to take alternative measures if the supplier or business partner provides credible assurance and is able to prove that it has immediately initiated countermeasures to prevent comparable violations occurring in future.