

In this Code of Conduct for Suppliers, Rathscheck Schiefer und Dach-Systeme, branch office of the Wilh. Wehrhahn KG, Neuss, as well as its affiliated companies have set out their requirements and principles for cooperation with their suppliers.

Our group of companies is committed to the following values:

We maintain a humane and open relationship with our employees and are fair and honest in our entrepreneurial competition. In all our activities we live up to our responsibility towards society and the environment.

We expect our suppliers (this term also includes work contractors and service providers) to implement and comply with the principles set out in this Code of Conduct in all areas of their business and to align their activities accordingly. The Code of Conduct is a binding component of every contractual relationship with our suppliers.







### 1. Applicable Laws, Human Rights

In all business activities and decisions, our suppliers shall observe the applicable laws and regulations, in particular the internationally recognized human rights including the core labor standards of the International Labour Organization (ILO), anti-corruption, competition, antitrust, environmental and data protection law.

### 2. Dealing with the Employees

Our suppliers

- promote equal opportunities, diversity and equal treatment and prohibit discrimination in hiring, compensation, promotion and employment of employees, particularly on the basis of nationality, ethnic origin, gender, sexual identity, marital status, age, physical condition, appearance, religion or worldview;
- respect applicable laws on the formation of interest groups and on freedom of assembly and association, and respect the right of employees to freely elect their own representatives, to freely form or join trade unions and to bargain collectively;
- compensate their employees appropriately and grant the statutory and collectively agreed benefits applicable to them.

## 3. Occupational Health and Safety

Our suppliers protect their employees from work-related health and safety hazards through preventive health and safety management and create safe working conditions for them.

In all cases, our suppliers must comply with the locally applicable health and occupational safety measures and obligations for their employees.

In addition, our suppliers attach importance to the continuous improvement of the working environment and promote the implementation of safety-relevant qualification measures.

#### 4. Environmental Protection

Our suppliers comply with all environmental standards applicable to them and are committed to the principles of sustainable management and to environmental protection as a corporate value.

Within their sphere of influence, our suppliers take all reasonable measures to protect the environment, minimize environmental pollution and continuously improve environmental and climate protection, in particular through environmentally friendly technologies.

### 5. Child Labor

Our suppliers strictly reject child labor and any exploitation of children and/or young people. The minimum age for admission to employment shall not be less than the age at which compulsory schooling ends and in no case below 15 years of age. ILO exceptions apply. Domestic standards for the protection of children and young people must be observed.

#### Forced Labor

Our suppliers do not tolerate any form of forced or compulsory labor, debt bondage, serfdom or slave labor. Likewise, prison labor that violates human rights is rejected. No employee may be directly or indirectly forced into employment by violence and/or intimidation and may not be subjected to inhuman or degrading treatment, physical punishment, etc. (ILO Conventions 29 and 105). Employees are to be treated with dignity and respect.





## 7. Due Diligence along the Supply Chain

Our suppliers observe and address all human rights and environmental standards not only in their own business area, but also along their supply chain. In particular, they protect the legal assets specified in Section 2 of the German Act on Corporate Due Diligence in Supply Chains ("LkSG") of July 16, 2021.

## 8. Fair Competition

Our suppliers are committed to fair competition and fair contracting without any restrictions.

In particular, all agreements between companies, resolutions of associations of companies and concerted practices which have the purpose or effect of preventing, restricting or distorting competition are prohibited, including in particular agreements with competitors for the purpose of market or customer allocation as well as price or condition agreements.

## 9. Corruption Prevention

Our suppliers

- do not tolerate any form of corruption or bribery;
- ensure that they do not offer, promise or grant any improper advantages to our employees in order to influence their decision-making;
- avoid conflicts of interest that could lead to corruption risks;
- carefully select their consultants, agents or other intermediaries according to suitability criteria; the compensation of consultants, agents and other intermediaries must not serve to provide improper advantages to suppliers, customers or other third parties;

- do not promise, give or accept gifts or invitations that are improper or are given with the intent to improperly influence the business relationship;
- refuse to make any unlawful material or immaterial donations to public officials, political parties, their representatives, elected officials, candidates for political office or other persons;
- always make donations and sponsorships on a voluntary basis without gaining any unlawful business advantage.

# 10. Money Laundering and Financing of Terrorism

Our suppliers shall take appropriate measures to prevent money laundering and the financing of terrorism in their companies.

### 11. Trade Controls

Our suppliers shall comply with all applicable national and international laws and regulations governing the import and export of goods, services and information and shall comply with any applicable embargoes and sanctions.

### 12. Data Protection

Our suppliers comply with all applicable laws on the protection of personal data, in particular of their business partners and employees.







## 13. Compliance with the Code of Conduct

Our suppliers

- ensure that the requirements and principles set out in this Code of Conduct are complied with;
- address this Code of Conduct or the requirements and principles contained herein to their suppliers, insofar as these suppliers are involved in the provision of goods or services to us;
- not tolerate any discrimination against persons who report violations of this Code of Conduct or the requirements and principles contained herein

# **14**. Information and Cooperation Obligations of the Supplier

Our suppliers shall inform us immediately after becoming aware of any significant incidents, in particular of any difficulties in complying with the requirements and principles set out in this Code of Conduct for Suppliers in their own business area and in the supply chain.

Our suppliers are committed to cooperate with us to end violations of this Code of Conduct or the requirements and principles contained herein and to ensure compliance with them in their own business area and along the supply chain.

If required, they will participate with an appropriate group of employees in our free training courses on human rights and environmental obligations.

## 15 Monitoring and Legal Consequences in the Event of Violations

Respect for human rights and the environment are assessment criteria in the supplier selection process and criteria in our analysis of human rights and environmental risks in the supply chain. For the risk analysis, we use the results of the evaluation of a supplier questionnaire and on-site inspections by our own employees or external audits.

Our suppliers agree to the implementation of these measures, which we carry out during normal business hours after giving appropriate advance notice depending on the risk situation.

If this results in additional requirements for the supplier, e.g. due to an increased risk situation, we will make appropriate agreements with the supplier to achieve the protection goals of the LkSG.

If a violation of the requirements and principles listed in this Code of Conduct is identified, we will notify the supplier immediately and set a reasonable deadline for the supplier to remedy the violation.

If it is not possible to remedy the situation in the foreseeable future, the supplier shall notify us immediately and, together with us, draw up a concept with a timetable for ending or minimizing the violation. If the grace period expires fruitlessly or if the implementation of the measures contained in the concept does not result in a remedy after expiry of the time schedule, we shall be entitled to suspend the business relationship until the supplier has terminated the violation or to terminate the contractual relationship extraordinarily.







In addition to our right to claim damages, our suppliers are obligated to indemnify us against all consequences of the violation of this Code of Conduct or the requirements and principles contained herein, in particular fines, penalties and claims by third parties or authorities.



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