



Code of Conduct

1 Introduction/Preamble

We at Provendör GmbH are constantly keen to grow and improve. It is therefore also important to us that our suppliers share this passion with us. We would therefore like to point out in advance that suppliers are welcome to contact us at any time with suggestions for improvement on the subject of sustainability and the code of conduct.

Provendör GmbH is committed to ecologically and socially responsible corporate management. We expect the same behavior from all of our suppliers. We also expect our employees to observe the principles of ecological, social and ethical behavior and to integrate them into the corporate culture. Furthermore, we strive to continuously optimize our entrepreneurial activities and our purchasing services in terms of sustainability and ask our suppliers to contribute to this in terms of a holistic approach.

These requirements apply equally to our employees. Detailed explanations are regulated in our internal Code of Conduct and are regularly trained in connection with the supplier regulations.

For future cooperation, the contracting parties agree on the validity of the following regulations for a common code of conduct. This agreement is the basis for all future deliveries. The contractors undertake to comply with the principles and requirements of the Code of Conduct and to endeavor to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. This agreement comes into effect upon signing. A breach of this code of conduct can ultimately be a reason for the company to end the business relationship, including all associated supply contracts. However, before such a termination occurs, joint solutions and suggestions for improvement are sought again with the supplier in order to resolve the problems and avoid the termination of the business relationship. This is used as the very last option.

The Code of Conduct is based on national laws and regulations such as the Lieferkettensorgfalts-Pflichtengesetz (LkSG) and international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Conduct, the United Nations Business and Human Rights Guidelines and the international labor standards of the International Labor Organization.

2 Requirements for Suppliers

2.1 Social Responsibility

We are strongly guided by the guidelines of the Business Social Compliance Initiative (BSCI) and the International Labor Organization. This is where the most important working standards and rules are defined, which we also refer to in the code of conduct. We would therefore like to point out the most important points below again. With the following points we would like to expressly refer to the ILO Convention, in which the following points are firmly anchored.

Exclusion of forced labour

No forced labour, slave labor or similar work may be used. All work must be voluntary and done without threat of punishment. Employees must be able to end their work or employment at any time. In addition, there must be no unacceptable treatment of workers, such as psychological harshness, sexual and personal harassment and humiliation. The commissioning or use of security forces is to be avoided if persons are treated inhumanely or degradingly or are injured or if freedom of association is impaired.

Ban on child labor

Child labor must not be used at any stage in the supply chain. Suppliers are requested to adhere to the recommendation from the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be lower than the age at which compulsory schooling ends under the law of the place of employment and in any case not less than 15 years. If children are found at work, the supplier shall document the actions to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected. Persons under the age of 18 shall not be employed in any work that is harmful to the health, safety or morals of children. Special protective regulations must be observed.

Fair compensation

Regular hours and overtime pay must be equal to the national statutory minimum wage or industry minimum standards, whichever is greater. In any case, overtime pay must be more than regular hours. Insofar as the remuneration is not sufficient to cover the costs of normal subsistence and to form a minimum of reserves, the supplier is obliged to increase the remuneration accordingly. Employees are to be granted all statutory benefits. Wage deductions as punitive measures are not permitted. The supplier shall ensure that workers receive clear, detailed and regular written information about the composition of their pay.



Fair working hours

Working hours must conform to applicable law or industry standards. Overtime is only permitted if it is performed on a voluntary basis and does not exceed 12 hours per week, while employees must be given at least one day off after six consecutive working days. The weekly working time must not regularly exceed 48 hours.

Freedom of Association

The right of workers to form and join organizations of their choice, to bargain collectively and to strike shall be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of workers for the purpose of collective bargaining should be provided. Employee representatives must be protected from discrimination. Employees shall not be discriminated against for forming, joining or being a member of such an organization. Workers' representatives shall be given free access to their colleagues' workplaces to ensure that they can exercise their rights in a lawful and peaceful manner.

Prohibition of discrimination

Discrimination or unequal treatment of employees in any form is not permitted. This applies e.g. B. for discrimination based on gender, racial attribution, caste, national, ethnic or social origin, skin color, disability, health status, political conviction, origin, world view, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

Health protection, safety at work

The supplier is responsible for a safe and healthy working environment. The necessary precautionary measures against accidents and damage to health that may arise in connection with the activity are taken by setting up and using appropriate occupational safety systems. Excessive physical or mental fatigue must be prevented by taking appropriate measures. In addition, employees are regularly informed and trained about applicable health and safety standards and measures. The employees are given access to drinking water in sufficient quantities as well as access to clean sanitary facilities.

Preservation of the natural basis of life

The supplier shall not, in violation of legitimate rights, take land, forests or bodies of water, the use of which ensures the livelihood of any person. He must refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this damages people's health, significantly impairs the natural basis for food production or prevents people from accessing clean drinking water or sanitary facilities.

Grievance mechanisms

The complaints mechanism is firmly established on our website using an email system. This must be accessible to employees while maintaining the confidentiality of their identity and effective protection against discrimination. Unless otherwise noted, it is the responsibility of the supplier at the operational level to establish an effective grievance mechanism for individuals and communities who may be adversely affected. Every inquiry that Provendör GmbH receives is treated confidentially and with seriousness.

Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold and for other raw materials such as cobalt, the company establishes processes in accordance with the principles of the Organization for Economic Cooperation and Development (Organization for economy Cooperation and Development, OECD) for performing due diligence to promote responsible supply chains for minerals from conflict-affected and high-risk areas and expects its suppliers to do the same. Smelters and refineries without proper, audited due diligence processes should be avoided.

2.2. Ecological Responsibility

Treatment and discharge of industrial waste water

Wastewater from operating procedures, manufacturing processes and sanitary facilities must be typed, monitored, checked and, if necessary, treated before it is discharged or disposed of. In addition, measures should be introduced to reduce the generation of waste water.

Dealing with air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions must be classified, routinely monitored, checked and, if necessary, treated before they are released. The supplier also has the task of monitoring its exhaust gas cleaning systems and is required to find economical solutions to minimize any emissions.

Handling of waste and hazardous substances

Supplier shall follow a systematic approach to identify, manage, reduce and responsibly dispose of or recycle solid waste. The bans on the export of hazardous waste in the Basel Convention of March 22, 1989 in the current version must be observed. Chemicals or other materials that pose a hazard if released into the environment shall be identified and managed in a manner that ensures safe handling, transportation, storage, use, recycling or reuse, and disposal of those materials is. Mercury is to be used in accordance with the bans of the Minimata Convention of 10 October 2013 and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001 as amended.



Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of all kinds, including water and energy, must be reduced or avoided. This happens either directly at the point of origin or through procedures and measures, e.g. by changing the production and maintenance processes or processes in the company, by using alternative materials, by savings, by recycling or by reusing materials.

Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Economical solutions must be found to improve energy efficiency and minimize energy consumption.

2.3 Ethical Business Conduct

Fair competition

The standards of fair business activity, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers, with which customers are to be restricted in their freedom to determine their prices and other conditions autonomously when reselling.

Confidentiality/Privacy

The Supplier undertakes to meet the reasonable expectations of its clients, suppliers, customers, consumers and employees with regard to the protection of private information. The supplier must observe the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting and passing on personal information.

Intellectual property

Intellectual property rights are to be respected; Technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected.

Integrity/Bribery, Advantage

All business activities must be based on the highest standards of integrity. The supplier must have a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing the standards shall be used to ensure compliance with anti-corruption laws.

3 Implementation of the requirements

When it comes to supply chains, we expect our suppliers to identify risks within them and take appropriate measures. In the event of suspected violations and to secure supply chains with increased risks, the supplier will inform the company promptly and, if necessary, regularly about the violations and risks identified and the measures taken.

The supplier agrees that the customer may carry out such audits once a year or for a specific reason to check compliance with the code at the supplier's business premises during normal business hours after reasonable advance notice by persons commissioned by the customer. The supplier can object to individual audit measures if they violate mandatory data protection regulations.

If a violation of the provisions of this code of conduct is identified, the customer will immediately notify the supplier in writing within one month and set him a reasonable grace period to bring his behavior into line with these provisions. If a remedy is not possible in the foreseeable future, the supplier must report this immediately and, together with the company, draw up a concept with a timetable for ending or minimizing the violation. If such a violation was culpable and the period of grace expires without result or the implementation of the measures contained in the concept does not bring about a remedy after the schedule has expired and makes it unreasonable for the client to continue the contract until it is properly terminated and no milder means are available, the client can terminate the contract with the company and terminate all contracts after the set deadline has expired without result, if he threatened to do so when setting the grace period. A legal right to extraordinary termination without setting a grace period, especially in the case of violations that are considered to be very serious, remains unaffected, as does the right to compensation.

4 Acknowledgment and consent of the supplier

By signing this document, the supplier undertakes to act responsibly and to adhere to the principles/requirements listed. The supplier undertakes to communicate the content of this Code to employees, agents and subcontractors in a way that they can understand and to take all necessary precautions to implement the requirements.

Place, Date

Bad Reichenhall, 15.05.2023

Company stamp, Signature

Provendör GmbH