

Code of Conduct

Suppliers



The rules of behavior applicable to our suppliers, as contained in the

Code of Conduct of the Ecoclean Group (Code of Conduct)

Automatic updating/modification status

Update service

- This document is currently not subject to an update service.
- Quality Management maintains an update service for this document.
- The latest version of this document is available on ecoNet.

Update status

Document version: 3.0 dated March 13, 2022

The history of previous versions is listed below:

Version	Date	Change/reason
1.0	01/09/18	First edition
2.0	29/11/21	Revision and online release
3.0	13/03/22	Additions to chapters 8, 14, 16, 17

Contents

Foreword	4
1 Scope of application	5
2 Legality principle	5
3 Records and reports	5
4 Relations to society and the public, corporate responsibility	6
5 Donations	6
6 Conduct towards business partners, competitors and third parties	6
7 International business relations (export controls)	7
8 Conduct towards employees and amongst colleagues	8
9 Conflicts of interest	9
10 Treatment of Ecoclean property	9
11 Data protection, confidentiality	10
12 Product quality and safety	10
13 Sustainability, occupational safety and health, environmental protection	11
14 Energy consumption and greenhouse gas emissions	11
15 Chemicals management	12
16 Labor and human rights	Fehler! Textmarke nicht definiert.

Foreword

The Code of Conduct of the Ecoclean Group establishes various rules of behavior for day-to-day work, which must be complied with by Ecoclean employees. We expect the business partners of Ecoclean, namely the suppliers, to behave in the spirit of the Ecoclean Code. We have therefore listed below all the rules of behavior of the Code which are applicable to you as a supplier. We assume that our suppliers will identify with these rules of behavior and take all measures necessary to ensure that they are complied with. Ecoclean also expects that you make appropriate efforts to ensure that the Code is complied with by your sub-contractors. In this way, you will be supporting the conviction held by Ecoclean that business success and the observation of ethical standards go hand in hand with each other.

Suppliers can direct any questions they may have on the Code of Conduct to the Corporate Compliance Officer at Ecoclean GmbH.

1 Scope of application

Ecoclean's Code of Conduct applies to all companies of the Ecoclean Group. Ecoclean is committed to ensuring that the Code of Conduct is applied in its entirety or that comparable rules of conduct are in place.

Where local law at Ecoclean locations gives rise to specific requirements, those requirements apply; in such cases, the Code of Conduct applies complementarily.

Ecoclean uses its best efforts to see that the principles of this Code of Conduct prevail in the cooperation with its business partners, especially its customers and suppliers.

2 Legality principle

Ecoclean and every individual employee comply with prevailing laws and internal rules. Ecoclean's Code of Conduct and the rules of ethical conduct defined therein are the guiding principles governing all business activities of the Ecoclean Group. The "argument" that it is permissible to deviate from the prevailing rules in individual instances for the purposes of business successes, and thus ultimately in the company's interest, is not accepted.

3 Records and reports

All business transactions must be recorded completely, correctly, in a timely manner and in accordance with the specified procedures.

All records, reports and entries in documents and books of the Ecoclean corporation must conform to the principles of proper bookkeeping and balancing.

4 Relations to society and the public, corporate responsibility

Ecoclean is aware of its responsibility to society and therefore seeks to play an active role as partner in the community. Ecoclean has a long tradition of supporting local social institutions and organisations. Ecoclean's activities are also consistent with the Global Compact¹, in which the United Nations has formulated principles for fair working conditions and responsible business.

5 Donations

Donations are only made if the recipient and purpose are known. Payments to private accounts are not permitted.

No direct or indirect political donations may be made to election candidates, office-holders, or political parties in Ecoclean's name.

Ecoclean does not involve itself in party political activities. However employees are free to pursue lawful political activities in their own time. Ecoclean welcomes civic, charitable, and social commitment by its employees.

6 Conduct towards business partners, competitors and third parties

Fair competition

Ecoclean supports fair competition and complies with competition and antitrust regulations.

¹ More information on the United Nations Global Compact can be found at www.unglobalcompact.org

Any form of direct or indirect bribery or favours, whether accepting or making payments, gifts or favours of any kind beyond the lawfully permitted framework and customary scale, is prohibited.

Our policy is to promote Ecoclean products fairly, honestly, and lawfully. False or misleading representations or deceptive marketing practices are not tolerated. In the interest of presenting a uniform global corporate identity marketing activities are to be coordinated with the Ecoclean Global Marketing Team.

Money laundering prevention

Ecoclean complies with its legal obligations for money laundering prevention and does not participate in money laundering activities. Money laundering is the channeling of assets (not only cash) which result from criminal activity into regular financial and economic circulation.

Commissions, consultants

Ecoclean employs consultants and intermediaries only in conformity with the legal framework conditions. This ensures that remunerations are paid only for consulting and mediation services actually performed and the remunerations are in an appropriate ratio to the performed service.

7 International business relations (export controls)

Ecoclean complies with laws and regulations that regulate the way in which companies may export and import products, services and information, and settle payments.

Business activities with countries, persons, or organisations on which sanctions have been imposed are subject to restrictions and can be illegal as a whole. Infringements can result in heavy fines and, for natural persons, also prison sentences.

8 Conduct towards employees and amongst colleagues

We expect our business partners and suppliers to treat their employees fairly, courteously and respectfully. Discrimination and harassment are not tolerated at any of our Ecoclean locations throughout the world. In particular, no discrimination on the grounds of ethnicity, disability, gender, religious belief, age or sexual orientation will be tolerated. Child labour, forced labour and human trafficking are prohibited, rejected without exception, and actively prevented. Ecoclean's suppliers are free to participate in any employee interest group provided for by law.

Suppliers of Ecoclean GmbH guarantee towards their employees:

a) Wages and benefits

That for a normal working week, the wages paid are always at least equal to the legal minimum wage or the minimum wage prescribed by the industry. Employees must receive all benefits required by national law (e.g. insurance contributions, allowances, etc.).

Employees must also receive full information on their wages and allowances at regular intervals and in a form that is comprehensible. Wages must be paid in accordance with local customary procedures. Unauthorized deductions from wages, as well as deductions as disciplinary actions, are not permitted.

b) Working hours

That the applicable statutory restrictions on working hours are complied with. The maximum permitted working hours per week are regulated by national laws.

Restrictions on overtime are regulated in accordance with regional legal or contractual obligations.

c) Freedom of association and collective bargaining

The rights to freedom of association and collective bargaining are key fundamental rights and international labour standards, the so-called ILO Core Labour Standards. They are anchored in Conventions No. 87 on Freedom of Association and Protection of the Right to Organise and No. 98 on implementation of the principles of the Right to Organise and Collective Bargaining.

The Right to Freedom of Association ensures that workers have the opportunity to organize and carry out their activities freely and without restrictions or interference. Workers have the right to join and actively participate in trade unions. At the same time, protection exists against any measures directed against this activity.

Collective Bargaining is the negotiation process between an employer (or an employers' association) and one or more trade unions. The objective of collective bargaining is to reach a collective agreement on wages and working conditions. Since these are legally binding contracts, they carry significantly more weight than other agreements between employers and workers.

The rights to freedom of association and collective bargaining are key means for achieving and maintaining fair working conditions. This is because trade unions actively campaign for better working conditions and higher wages. For workers, they are an important means of enforcing their rights.

9 Conflicts of interest

Business and private interests are strictly separated at Ecoclean. The individual's own position within the company may not be abused for their own personal gain or that of their family or friends.

Preference may not be given to business partners out of personal interests.

Employees are requested to disclose any suspected or actual conflict of interests to their superior and to collaborate with the superior to resolve this conflict.

10 Treatment of Ecoclean property

Company property, whether tangible or intangible, is intended to assist employees in performing the duties Ecoclean assigns them. It may only be used for lawful business purposes and not for personal gain. Ecoclean employees ensure that company property is protected against loss, theft, and improper use.

Know-how, patents, and property rights are of utmost importance for Ecoclean as a technology group. Superiors and employees know that and handle intellectual property with special care and responsibility.

11 Data protection, confidentiality

Personal data on Ecoclean's employees and business partners are only stored, processed, and used in compliance with legal regulations.

Confidential information supplied by business partners is treated confidentially and used only for the agreed purpose. Conversely, Ecoclean trusts that Ecoclean documents are handled with due care. Obligations or agreements for particular secrecy are observed at all times. Ecoclean takes appropriate measures to ensure that confidential information is protected.

12 Product quality and safety

Ecoclean develops innovative solutions and manufactures products of high technological standard that guarantee safe operation. Energy efficiency and the economical use of materials are at the forefront of Ecoclean's R&D work.

It is the mission of every individual Ecoclean employee to see that Ecoclean products meet the highest demands in terms of safety, health, environmental protection and quality, and that they also conform to the respective legal requirements.

Ecoclean's production facilities are certified to ISO 9001 standards. In individual instances, certifications are conducted according to additional or specific quality management systems such as VDA² 6.4.

² VDA = Verband der Automobilindustrie e.V., Berlin (German Automotive Industry Association)

13 Sustainability, occupational safety and health, environmental protection

Ecoclean is constantly striving to reduce the consumption of energy, materials, and resources, and thus further the sustainability standards, at all its locations. This contributes to the company's successful long-term performance. Compliance with the laws for the protection of the environment is matter-of-course.

Ecoclean is committed to creating and assuring a safe, protected, and healthy working environment. Safety regulations and practices are complied with.

14 Energy consumption and greenhouse gas emissions

As our worldwide presence continues to grow, so does our responsibility for our actions, which must reflect our global commitment to the environment. We expect our suppliers and their contractors to comply with all applicable environmental protection regulations, codes and standards. It is imperative that suppliers be committed to environmental compliance, minimize the environmental impact of their activities, and continuously strive to improve environmental performance. Suppliers must keep records enabling them to answer inquiries about consumption of resources, emissions, environmental compliance, environmental risks and liability, as well as other sustainability indicators.

We expect our suppliers to measure their energy consumption and to reduce avoidable consumption. Energy audits can be a first step towards identifying potential opportunities.

Greenhouse gases, and in particular carbon dioxide (CO₂), intensify the greenhouse effect which leads to global warming. Saving energy significantly contributes to reducing CO₂ emissions. Fluorinated greenhouse gases (F-gases) are between 100 and 24,000 times more harmful to the climate than CO₂ (source: German Federal Environmental Agency). Fluorinated greenhouse gases are mainly used nowadays as refrigerants, aerosol propellants, foam and insulation blowing agents, and fire

extinguishing agents. In the interest of reducing emissions from these substances, apart from technical measures it is above all necessary to introduce targeted substitute agents or alternative technologies (source: German Federal Environmental Agency).

Our suppliers are also expected to establish processes that help minimize waste, prevent air pollution, conserve energy and reduce carbon emissions, as well as to strive to reduce their consumption of such commodities as water and electricity, and to commit to operating in a sustainable manner. In the annual supplier evaluation of our most important partners, the item “environment” is a decisive criterion for classification as an A, B or C supplier.

15 Chemicals management

Suppliers should have procedures in place to notify local authorities of any accidental release or introduction of hazardous substances into the environment, or of any other environmental emergency. The REACH regulation and Candidate List must be observed (<https://echa.europa.eu/candidate-list-table>).

Suppliers from Germany must in addition comply with the Chemicals Prohibition Ordinance (ChemVerbotsV) and its implementation.

We expect our suppliers to safely dispose of their waste materials in accordance with national legislation, and to opt for recycling and environmentally conscious disposal options.

16 Whistleblowers

Regardless of whether you are an employee or a business partner, you can report suspected criminal offences or serious violations of regulations to us - either stating your name or remaining completely anonymous. You will remain protected. It will be impossible to trace the report back to you, provided you do not disclose any data that could be used to draw conclusions about you. The following reporting form guides you through the process:

<https://Ecoclean GmbH-group.iwhistle.de/>

1 Implementation and monitoring

This Code of Conduct is a key element of the values lived by Ecoclean GmbH. Consistent compliance with these principles is essential and every business partner is responsible for this.

Implementation and verification of compliance with these principles are accompanied, supported and monitored by the compliance organization established by Ecoclean GmbH's top management.