

# **GROZ-BECKERT**

# Supplier Code of Conduct

The values of Groz-Beckert have grown over time, are firmly anchored in the company, and have been practically lived by all employees since 1852. The Groz-Beckert corporate strategy is built on the principle of laying the foundation for future generations today. To achieve this, we act with foresight and reflection, continuously create added value and strive for sustainable development. Our corporate decisions must be measured against this commitment.

#### **Choosing our suppliers and partners**

We expect our business partners to adhere to this Code of Conduct and to act professionally without exception. This is ensured by a careful selection process. In a multi-stage qualification process for suppliers, we ask whether they act in accordance with Groz-Beckert's sustainability goals and comply with national and international standards and laws on occupational safety, environmental protection and human rights. We also expect our suppliers not to purchase goods and materials for the manufacture of their products for Groz-Beckert in an illegal or unethical manner.

Our employees who are responsible for selecting business partners must take this into account and review supplier relationships continuously. This is done based on an appropriate risk management process and is accompanied by regular training for employees.





### The basis: Compliance with legal regulations and human rights



Compliance with all laws and legal standards is a minimum requirement for Groz-Beckert. As a global company, we respect the legal regulations of the individual countries and the international community and expect the same from our business partners. Should there be conflicting requirements or standards, for example in countries where national laws, regulations or customs deviate from internationally applicable standards, we expect the usual, generally accepted international standards to be adhered to, unless local law contradicts these. Groz-Beckert does not tolerate any form of corruption and expects its business partners to commit themselves to fair business practices at all times.

We expect all UN human rights treaties to be respected and the UN Guiding Principles on Business and Human Rights to be followed. Groz-Beckert rejects any kind of violation of human rights, in particular discrimination in employment and hiring, child labor and slavery, as well as threats to persons who advocate the observance of human rights. In countries that fail to fulfill their duty to protect human rights, in whole or in part, we expect our business partners to remain obliged to protect these rights, but without taking on the tasks of the government.

Illegal actions by our business partners would also damage the reputation of Groz-Beckert. All business partners are therefore required to familiarize themselves with and comply with the internal and external regulations applicable in their respective field of responsibility and the applicable laws. Groz-Beckert considers illegal conduct as damage to the business relationship and the contractual relationship.

## Principles of action for our business partners

#### **Confidentiality and know-how protection**

Intensive exchange and flow of information based on mutual trust are the foundations of our cooperation with business partners. As we are aware of the sensitivity of our own know-how, and our data, we do not pass it on to unauthorized persons and systematically protect it against unauthorized access. We take particular care in public and protect business and personal information. This applies especially, but not exclusively, to business and private communication as well as social media, on business trips, exhibitions and in other public spaces.

New ideas and products, inventions and innovations ensure that we keep our leading position in the markets. That is why we work to preserve and protect our trade secrets. The knowledge of each individual is an important part of our know-how and therefore worthy of protection.

It is a matter of course for Groz-Beckert to protect the know-how of our business partners in the same way, and we expect the same from our business partners in return. For our part, we obligate external partners to secrecy if necessary and thus make mutual trust the basis of every cooperation.

#### **Fair competition**

Reputable and fair dealings are the basis of every successful business relationship. This is another reason why fairness is one of Groz-Beckert's core corporate values. The requirement we place on ourselves to impress our customers and partners through quality and innovation is directly linked to this principle. That's why we follow this approach both inside and outside the company and are always committed to fair competition. We expect this from our business partners in equal measure.

Violations of antitrust regulations are unacceptable for Groz-Beckert and are consistently investigated and punished.

#### **Bribery and corruption**

Groz-Beckert expects its business partners to distance themselves from any kind of corruption. Our business partners impress with their products and services and not with personal advantages. Nor do we allow ourselves to be bribed or take advantage of our position in the company.

Gifts and invitations are customary and permitted when dealing with business partners in the ordinary course of business and to an appropriate extent. The principle always applies that the mere appearance of undue influence must be avoided – regardless of whether we are a giftor or a giftee. This also applies to discounts and benefits.

> Gratuities on our part are always appropriate and never aim to influence the business partner. Conversely, gifts and invitations from our business partners have no influence on our actions. Our decisions are always based on reasonable grounds and are not guided by gratuities. Gratuities are rejected by us if it appears that they are intended to influence the situation.

#### **Conflicts of interest**

Situations are conceivable where personal interests could conflict with our professional judgment. In such cases, Groz-Beckert expects to be informed of the conflict of interest by the business partner in a transparent and timely manner and to work together to clarify the further course of action.

#### Prevention of money laundering

Money laundering refers to the procedure for introducing illegally generated money or assets acquired illegally into the legal financial and economic cycle. We expect our business partners to comply with the statutory obligations for money laundering prevention and not to participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

#### Handling personal data

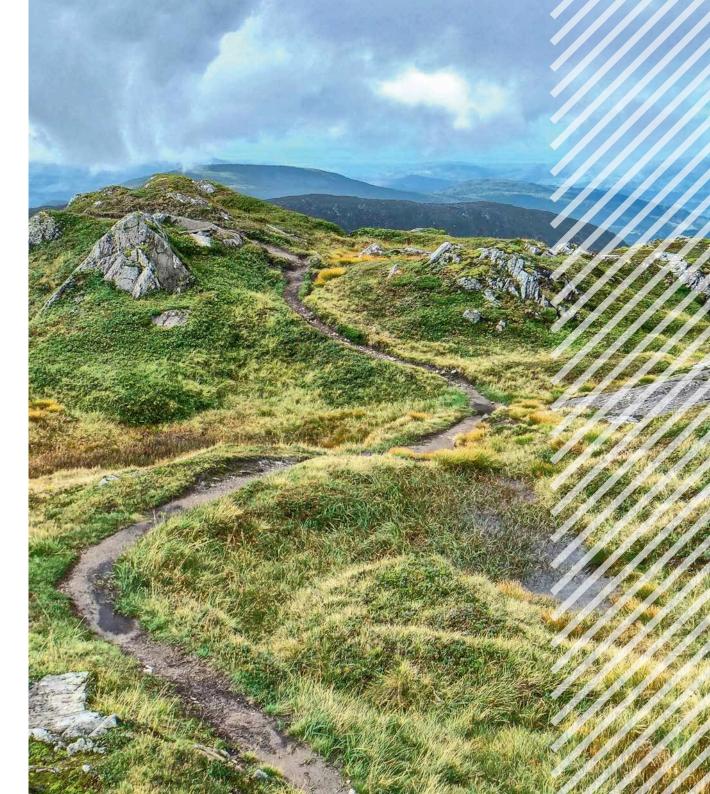
We take data protection very seriously as an individual right to privacy. This creates a great deal of responsibility. However, as digitalization opens up new business areas, innovative processes and communication and mobility opportunities that offer great added value for our employees and business partners, the collection or creation of data as well as its storage and use is unavoidable.

We expect our business partners to only process and use personal data to the extent that this is explicitly permitted by laws, regulations and/or the consent of data subjects. Adequate transparency of our business partners towards Groz-Beckert regarding the handling of our data as well as choices regarding the use of our data is a prerequisite.

#### Environmental and resource protection

We expect our business partners to maintain livable ecological conditions for present and future generations. This includes, in particular, setting binding sustainability targets and committing to an active strategy to reduce greenhouse gas emissions and resource consumption.

We also expect our business partners to strive for continuous improvement along the entire supply and value chain – whether in the planning of internal and external processes, the selection of materials and suppliers, or the development of products and services.



## Further support and contact persons

It is not possible to outline all possible and conceivable situations and questions in this Code of Conduct. The principles of conduct set out here therefore also highlight the responsibility of each individual to act with care, sensibly and with integrity at all times. Our business partners can get in touch with their personal contact person at Groz-Beckert at any time if they have any questions about the content or interpretation of the Code of Conduct, address their concerns openly and seek advice in difficult situations.

We expect our business partners to inform their employees about the Code of Conduct and to ensure that it is understood and complied with.

In the event of (suspected) violations of the regulations summarized here, we ask you to contact your responsible contact person. You can also report the violation via the whistleblowing platform "tell us" or using the e-mail address **tell.us@groz-beckert.com**. Reports are treated as strictly confidential. All reports of violations will be investigated in detail and proven misconduct will be sanctioned appropriately.







#### Groz-Beckert KG

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