



# Interroll Supplier Code of Conduct

01 June 2023

## Part I: Policy Statement

Interroll<sup>1</sup> is guided by the principles of sustainability. In order to meet our responsibility towards future generations, we ensure that our products and business processes are always state-of-the-art and sustainable in ecological, economic and social terms.

Our strategies and activities are guided by universal principles in the areas of human rights, labor standards, environmental protection, and anti-corruption. In addition, we strive to advance our social objectives. This Supplier Code of Conduct thus complies in every respect with the basic principles of the UN Global Compact.

Interroll requires all its suppliers and subcontractors to comply with these principles. These are in line with Interroll's corporate values and are detailed in this Code of Conduct. They are an important part of supplier selection and evaluation. Furthermore, we require that our suppliers also observe these standards in the further course of their supply chain.

Suppliers are generally selected after comparing price, quality, performance, and suitability based solely on objective criteria. Agreements with suppliers must be made in a clear and unambiguous form and must be documented together with any subsequent changes and amendments.

This Code goes beyond mere compliance with the law by drawing on internationally recognized standards to advance social and environmental responsibility. In the event of differences between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law.

Interroll Holding AG, Sant'Antonino, 01 June 2023

A handwritten signature in black ink, appearing to read "Ingo Steinkrüger".

**Ingo Steinkrüger**  
Chief Executive Officer

A handwritten signature in blue ink, appearing to read "Heinz Hössli".

**Heinz Hössli**  
Chief Financial Officer

<sup>1</sup> Includes all fully consolidated "Interroll" legal entities



## Part II: Specifications for suppliers

### 1. RECOGNITION AND COMPLIANCE WITH THE RELEVANT LAWS

In order to comply with the requirements of the Code of Conduct, suppliers shall comply with all national laws and regulations and other applicable standards. In case of discrepancies between the provisions of this Code of Conduct and national laws or other applicable standards, the higher or stricter requirements shall be met.

Upon Interroll's request, the Supplier shall provide evidence of its compliance with the obligations set forth in this Code of Conduct and prove that all employees of its companies and subcontractors involved in the supply of products and services to Interroll comply with this Code of Conduct.

Suppliers are required to meet the expectations set forth in this Code of Conduct through the allocation of appropriate resources.

### 2. RESPONSIBLE CORPORATE MANAGEMENT AND ETHICS

In accordance with our Code of Conduct, we conduct our business honestly and ethically. We are committed to acting professionally, fairly and with integrity at all times in all our business relationships. We also require our suppliers to always act ethically. This includes business relationships, procedures, procurement, and operations. The ethical requirements cover the following aspects:

#### 2.1 ANTI-CORRUPTION AND BRIBERY

No supplier shall practice or tolerate any form of corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage. Similarly, our suppliers do not offer or accept bribes or other illegal inducements to their business partners. Interroll does not tolerate any of these practices and therefore does not accept any form of unlawful payment or inducement in any of our business transactions.

#### 2.2 COMPETITION AND ANTITRUST LAW

Interroll respects fair competition. The supplier shall comply with applicable laws designed to protect and promote competition, in particular, applicable antitrust laws and other laws regulating competition. In competing for market share, Interroll is guided by the need to act with integrity. Accordingly, suppliers conduct their business in accordance with fair competition and in compliance with all applicable antitrust laws.

#### 2.3 FOREIGN TRADE

Supplier shall comply with all applicable export control, customs, tax and foreign trade regulations, including, but not limited to, applicable EU and U.S. sanctions, embargoes and other laws, regulations, government orders and policies controlling the transfer or shipment of goods, technology and payments.

#### 2.4 FRAUD AND ANTI-MONEY LAUNDERING



The supplier shall take appropriate measures to prevent any form of fraud and to ensure that the business relationship with Interroll is not misused for money laundering or other unlawful activities (e.g., financing of terrorism).

## 2.5 CONFLICTS OF INTEREST

The supplier makes its business decisions independently and takes care to strictly separate business interests from private interests.

## 2.6 CONFIDENTIALITY

The supplier is obliged to treat trade and business secrets as well as all other confidential information as strictly confidential. Such information shall be adequately protected from disclosure to and access by third parties. Third parties also include employees of the supplier who do not directly require this information for the performance of the business relationship.

## 2.7 DATA PROTECTION

Supplier shall protect the processing (such as collection, storage, organization, structuring, adaptation or modification, retrieval, consultation, use and disclosure by transmission) of personal data in strict compliance with all freedom of information laws, particularly with, the European Union Freedom of Information Act, data protection laws (such as the EU General Data Protection Regulation and national data protection laws) and all applicable regulations.

## 2.8 INTELLECTUAL PROPERTY

The supplier shall respect the intellectual property rights. The supplier shall carry out the transfer of technology and know-how in such a way that all intellectual property rights of Interroll are protected.

## 2.9 COUNTERFEIT PRODUCTS

Supplier shall develop, implement and maintain methods and procedures appropriate to its products and services to minimize the risk of counterfeit parts and materials entering products.

### 3. RESPONSIBLE WORKING CONDITIONS AND PROTECTION OF HUMAN RIGHTS

The supplier respects and supports the observance of internationally recognized human rights, in particular the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the fundamental conventions of the International Labor Organization (ILO) and confirms the following:

#### 3.1 NO FORCED OR CHILD LABOR, SLAVERY OR HUMAN TRAFFICKING

The supplier rejects any form of forced labor and does not employ any person, under 15 years of age or the legal minimum age - whichever is higher.

The Supplier does not participate in and rejects all forms of slavery and human trafficking. In particular, the Supplier shall ensure that no exploitative child labor within the meaning of ILO Convention No. 182 is or has been used in the production or processing of the products and services to be supplied, and that these products and services do not violate any obligations arising from the implementation of this Convention.

#### 3.2 DIVERSITY, ANTI-DISCRIMINATION AND EQUAL OPPORTUNITIES

The Supplier values diversity in its workforce and is committed to creating an inclusive work environment. The supplier is committed to the principle of equal opportunity in the selection and promotion of its employees and other employment decisions. In doing so, the supplier shall refrain from any discriminatory treatment based on gender, ethnic and cultural origin, religion, political views, nationality, membership in an employee organization, disability, age or sexual orientation.

#### 3.3 COMBATING HARASSMENT

Supplier shall not tolerate coercion, harassment or bullying at the work area. The supplier does not threaten or harass employees in any form of psychological, physical, sexual or verbal abuse, intimidation or harassment and prohibits this.

#### 3.4 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

The supplier respects the right of its employees to freedom of association in accordance with local laws. The supplier shall treat employees who are employee representatives or members of trade unions fairly. The supplier respects collective bargaining as a process of negotiations between employers and a group of employees with the aim of reaching an agreement that regulates working conditions. The supplier strives for a trusting cooperation with the relevant employee representatives and trade unions.

#### 3.5 WORKING HOURS AND WAGES

The supplier shall comply with all applicable laws regarding working hours, minimum wages and social benefits. In addition, working conditions must allow for a reasonable standard of living that enables and promotes subsistence and social and cultural participation.

#### 3.6 HEALTH AND SAFETY



Suppliers shall ensure the safety of all employees in the workplace and provide a health-promoting work environment that supports accident prevention and minimizes the exposure of the supplier's employees to health hazards. If hazards cannot be completely avoided, suppliers will provide employees with appropriate personal protective equipment free of charge.

Suppliers are expected to implement an appropriate health and safety system. Workers shall be adequately trained in their native language on workplace health and safety issues. Health and safety related information shall be clearly posted in the facilities. As part of this, the supplier shall implement a management system that complies with the requirements of ISO 45001 in its current version.

### 3.7 PROTECTION OF LOCAL COMMUNITIES AND INDIGENOUS PEOPLES

The supplier shall respect the rights of local communities and indigenous peoples who may be affected by operations at the supplier's sites and shall consider the local impacts of its operations.

### 3.8 CONFLICT MATERIALS

The supplier undertakes to identify and replace materials and products containing minerals from conflict and risk areas and to avoid the use of such minerals. The supplier shall investigate the origin of these minerals and shall take due diligence measures in its supply chain to ensure that conflict minerals are sourced only from mines and smelters located outside conflict and high-risk areas or use smelters and refineries that are validated as compliant with an independent responsible mineral sourcing validation program. The supplier is also required to extend the responsible sourcing and due diligence requirements to sub-suppliers and report any identified risk in the supply chain. If Interroll has a legitimate interest, the supplier shall provide a Conflict Minerals Reporting Template (CMRT) and/or CRT (Cobalt Reporting Template) on an annual basis. Suppliers of 3TG (tin, tantalum, tungsten and gold) and suppliers using these raw materials in their products must identify all smelters and refiners in their supply chain and disclose these.

#### 4. SUSTAINABILITY, ENVIRONMENTAL AND CLIMATE PROTECTION

For Interroll, it is crucial to align the future of humanity with technological progress. Interroll continuously evaluates and improves its products and processes to ensure sustainable use of resources and efficient use of energy. Our declared goal is to protect the environment and to preserve the climate and natural resources with our activities and products. Interroll demands the same from its suppliers. The supplier shall ensure that it complies with all applicable environmental laws and regulations. In addition, the supplier respects the requirements of the international conventions of Minamata (mercury), Stockholm (persistent organic pollutants) and Basel (hazardous waste). The Supplier shall keep all required environmental permits up to date and comply with reporting requirements and regulations. In addition, the supplier has taken or will take the following actions, which include environmentally friendly and sustainable business practices, such as:

##### 4.1 CLIMATE PROTECTION / REDUCTION OF GREENHOUSE GAS EMISSIONS

The supplier shall implement a carbon avoidance strategy to contribute to the commitments under the Paris Agreement (e.g., corporate targets for its Scope 1, 2 and 3 emissions). Upon Interroll's request, the supplier shall report regularly on its progress, in particular regarding its carbon footprint at product level. If Interroll sets material and component-specific CO<sub>2</sub> targets as part of the contract award process, these are binding during project implementation.

##### 4.2 PROTECTION OF WATER RESOURCES

The supplier takes measures to reduce water consumption and wastewater generation. In addition, measures are taken to prevent the pollution of surface or ground water.

##### 4.3 CIRCULAR ECONOMY AND WASTE MANAGEMENT

The supplier takes measures to reduce the environmental impact of its products and services during their life cycle (i.e., design, development, production, transportation, use and recycling) and takes measures to conserve energy and natural resources. The supplier ensures that no waste is disposed of illegally and takes measures to eliminate waste by improving, replacing, reusing, and recycling materials.

##### 4.4 MANAGEMENT SYSTEM

The supplier shall apply an environmentally sound management system and take comprehensive environmental protection measures in the areas of procurement, manufacturing, and transport activities. In this context, the supplier shall implement a management system that complies with the requirements of ISO 14001 in its current version.

##### 4.5 BIODIVERSITY

The supplier supports the conservation of natural ecosystems and avoids any business activity that contravenes this principle, e.g., prevention of illegal logging or the conversion of natural forests into usable land.



#### 4.6 HAZARDOUS MATERIALS

The supplier implements processes and procedures to identify, manage, handle, dispose of and replace hazardous materials.

#### 4.7 RECYCLED MATERIAL

The supplier must increase the use of recycled material for its products and packaging materials as much as possible.

#### 4.8 MATERIAL COMPLIANCE

The supplier shall comply with the laws and regulations in force in the countries of production and also in the countries/regions where the supplier directly sells or uses the product or part (e.g., European Union) regarding prohibition, restriction, registration, authorization and/or traceability of substances that may be harmful to human health or the environment (e.g. REACH, RoHS, ELV, TSCA (Toxic Substances Control Act)). Substances of Very High Concern (SVHC) based on the European REACH regulation must be avoided in products and parts. To track and trace substances of concern and critical materials, the preparation of Material Data Sheets (MDS) for all parts and materials delivered to Interroll is mandatory. The supplier informs Interroll at least once a year without prior request about the conformity of his products and services.

### 5. DILIGENCE AND COMPLIANCE MANAGEMENT SYSTEM

The Supplier shall implement and maintain a risk management process to identify, prevent and mitigate risks and to identify, prevent, mitigate, and address impacts on the environment and people. The supplier shall conduct due diligence in the areas covered by this Supplier Code of Conduct in accordance with international standards such as the OECD Guidelines on Due Diligence for Responsible Business and the UN Guiding Principles on Business and Human Rights. Each supplier is responsible for ensuring that its employees comply with this Supplier Code of Conduct in their business dealings with Interroll. In order to effectively assess and ensure that the supplier complies at all levels, Interroll expects the supplier to implement a compliance management system that includes, at a minimum, the following items:

#### 5.1 SUPPLY CHAIN

The supplier establishes processes to effectively communicate the principles of this Supplier Code of Conduct to its suppliers and subcontractors and require its supply chain to comply with the principles of this Supplier Code of Conduct to the best of its ability.

#### 5.2 RISK MANAGEMENT

The supplier initiates measures to effectively monitor and verify compliance with the Supplier Code of Conduct, including maintaining documentation to demonstrate commitment to compliance with the Supplier Code of Conduct.

#### 5.3 TRAINING PROGRAMS

The supplier maintains training programs to educate employees on the principles of this Supplier Code of Conduct and all applicable laws and regulations referenced herein.



#### 5.4 REPORTING IRREGULARITIES/CONCERNS

If not already in place, the supplier must establish an internal reporting channel for its employees to ensure that violations of applicable laws and regulations can be reported. The supplier must ensure the protection of the reporter and must ensure that employees who report a violation do not have to fear negative consequences for themselves.

### **Part III: Operational audit and evaluation**

By signing the Supplier Code of Conduct, the supplier confirms acceptance of the Supplier Code of Conduct and undertakes to comply with it. Interroll reserves the right to actively verify compliance with the Supplier Code of Conduct with notice in the event of justified suspicion of a violation. Such audits may be conducted either by Interroll employees or by an auditor appointed by Interroll. In connection with such an audit, the supplier shall provide and prepare for Interroll access to all relevant and reasonably requested information and documentation. Suppliers who fail to comply with the Supplier Code of Conduct are required to provide Interroll with a plan of action for compliance within a reasonable timeframe. Failure to comply with the Supplier Code of Conduct will jeopardize the supplier's business relationship with Interroll and risk termination of that relationship. Suppliers must also encourage their subcontractors to comply with the Supplier Code of Conduct as well as monitor compliance in the workplace.

Interroll has established a whistleblower platform through which violations of these requirements can be reported to Interroll by any partner in the supply chain. If a violation falls within the supplier's sphere of influence, the associated risks must be eliminated by the supplier without delay. The supplier shall make its supply chains aware of the available reporting channels for complaints and ensure that this information is passed on to the lower levels of the supply chain.

Interroll conducts regular online assessments of sustainability performance with external partners. The supplier is obliged to support these assessments.

### **Part IV: Additional obligations**

In addition to the requirements listed in the Code of Conduct, suppliers have additional obligations arising from the contracts concluded with Interroll.



## Part V: Signature

We hereby agree to comply with the principles set out in the Code of Conduct for Suppliers.

Company name: \_\_\_\_\_

Location, Date: \_\_\_\_\_

Name (Block letters) \_\_\_\_\_

Signature \_\_\_\_\_

Function of the signatory: \_\_\_\_\_

Name (Block letters) \_\_\_\_\_

Signature \_\_\_\_\_

Function of the signatory: \_\_\_\_\_

This document must be signed by two authorized representatives of the company and returned to Interroll within 15 working days of receipt.

If you have any questions or concerns regarding this Supplier Code of Conduct, please contact Patrick Wedewardt, Director Corporate Sustainability & Compliance, phone +49 6262 9277 240 or at [compliance\(at\)interroll.com](mailto:compliance(at)interroll.com)