

Haberkorn Code of Conduct for Suppliers

Dear Sir or Madam,

The Haberkorn Code of Conduct for Suppliers is a central component of our sustainability strategy, whose core values include treating our employees with respect, designing responsible products and utilising resource-saving, efficient processes.

By consistently focusing on these three pillars, we – together with our suppliers – create sustainable added value for the environment, our company and society as a whole. We view the systematic implementation and constant adherence to this code of conduct as a process of continuous development, one which we want to undertake together with our suppliers.

Our code of conduct is based on the UN human rights conventions, International Labour Organization (ILO) conventions as well as principles of the UN Global Compact. It outlines the requirements we set out for our suppliers with regards to human rights, labour standards, environmental protection and integrity.

We expect all suppliers to meet these requirements, pass them on to their own sub-suppliers and ensure their compliance in a fitting manner. The implementation of this code is carried out within the framework of an ongoing due diligence process, which includes risk analyses, preventative measures and – if necessary – remedial action. Haberkorn reserves the right to verify compliance with the code together with its suppliers, such as through discussions, self-assessments or audits. A confidential reporting and complaint mechanism has been set up for reporting potential violations.

We assume that you, as our supplier, will meet these requirements and ask you to please confirm compliance with the Haberkorn Code of Conduct by having it signed by an authorised signatory.

Best Regards,

Mag. Gerald Fitz CEO
Haberkorn Holding AG

We hereby confirm our compliance with the Haberkorn Code of Conduct for Suppliers as part of our business relationship with Haberkorn.

_____	_____	_____
Place	Date	Company
_____	_____	_____
Name	Role	Signature

HABERKORN CODE OF CONDUCT FOR SUPPLIERS

1. Compliance with legal, regulatory & industry-specific requirements

Our suppliers commit to complying with all applicable national laws and regulations, as well as conventions, norms and industry standards with regards to business integrity, human rights, labour standards, environmental protection, occupational safety and health. In case of discrepancies, the regulation with the higher level of protection takes precedence. Furthermore, our suppliers undertake to stay independently and constantly informed regarding the current legal situation and any relevant regulatory developments and to ensure compliance with them. This applies in particular to product conformity (including conflict-free procurement), customs and trade (including export controls, economic sanctions and export control restrictions), fair competition as well as information security and data protection.

Our suppliers also guarantee proper financial accountability, in particular by maintaining complete, accurate and traceable business and accounting records in accordance with all applicable legal requirements.

The aforementioned lists serve as examples and are not exhaustive.

2. Ban on child labour

Our suppliers commit to complying with UN regulations regarding children's rights. In particular, they commit to complying with the minimum age for admission to employment and to banning all exploitative child labour or taking immediate action against it. Furthermore, our suppliers are to comply with the requirements set out by the ILO conventions and the UN Convention on the Rights of the Child. Only employees who have reached the legally prescribed minimum age may be employed. Suppliers must conduct documented age checks and implement clear procedures to prevent child labour.

3. Ban on forced labour

No one should be employed or forced to work against their will. The use of forced labour of any kind, as well as any other work performed under physical or psychological duress, is prohibited. All employment relationships must be based on voluntary participation and the freedom, dignity and safety of employees must be respected at all times. Suppliers are required to ensure that there is no form of forced labour within their factories and supply chain.

4. Protection from inhumane treatment

Any form of physical or psychological violence, abuse or inappropriate disciplinary action is strictly prohibited. This includes, in particular, deprivation of liberty, physical or psychological punishment, threats of violence, sexual harassment and any other type of unwanted or abusive behaviour. Suppliers are required to ensure a working environment in which respect, fairness and protection from any form of violence or harassment are guaranteed at all times.

5. Ban on discrimination

Our suppliers recognise and respect the right of every person to equal opportunities in all aspects of employment, particularly with regard to hiring, remuneration, access to further training and education, promotion, termination of employment or retirement, regardless of their ethnic and social origin, nationality, religion, age, marital status, gender, sexual orientation, disability, political opinion or trade union membership.

6. Respect for freedom of association

Our suppliers recognise and respect the right of their employees to assemble, form a trade union of their choice and engage in collective bargaining. Members of employee organisations or trade unions are neither disadvantaged nor favoured and are permitted to perform their representative function in the workplace. In countries where the right to association and right to collective bargaining are legally restricted, the employer adopts an open attitude towards the development of equal means for free association and negotiation.

7. Safety and health at the workplace

Our suppliers commit to taking all necessary measures, within the framework of national regulations and industry standards, to ensure safe, healthy and hygienic working conditions (and, where applicable, safe living conditions) for their employees. Appropriate and preventative steps must be taken to prevent work-related accidents or health problems. This includes regular health and safety training for employees. It is the responsibility of a management representative to ensure occupational health and safety.

8. Working hours

Our suppliers commit to structuring working hours in accordance with applicable national laws or industry standards, always applying the regulation that offers greater protection for their employees. Overtime is voluntary, must not be demanded to an excessive degree and must be compensated accordingly.

9. Fair compensation

Our suppliers must ensure that the nationally stipulated minimum wage is guaranteed and that all wages, social benefits, overtime and other remuneration paid comply at bare minimum with any applicable laws or binding collective agreements, whichever is higher. Wages should always be sufficient to cover the basic needs of employees and to allow for a certain amount of disposable income. Wages must be paid in accordance with local customary procedures. Unjustified salary deductions and fines as disciplinary measures are not permitted.

10. Responsible use of natural resources

We expect our suppliers to systematically implement effective and preventative measures to minimise environmental impact. This includes, in particular, the reduction of CO₂ emissions in accordance with the stipulations of the Paris Climate Agreement and the responsible, efficient use of natural resources. Key areas of action and measures should be determined on the basis of a sound analysis or materiality assessment, the goal being the continuous improvement of environmental performance. Initiatives that strengthen environmental awareness among customers, suppliers and employees should also be promoted.

11. Corporate integrity and ethical business conduct

Our suppliers are committed to proactively combating all forms of corruption, including extortion and bribery. Furthermore, conflicts of interest should be avoided and disclosed if they do occur. Our suppliers are also required to implement appropriate guidelines, training and inspections to prevent corruption throughout their company and along their supply chains.

12. Information security and data protection

Our suppliers undertake to take appropriate technical and organisational measures to ensure the confidentiality, integrity and availability of information and to protect it from unauthorised access, loss or misuse.

Personal data must be processed exclusively in accordance with all applicable data protection regulations and only for legitimate purposes. Our suppliers commit to handling personal data responsibly, securely and to the necessary extent. Security-relevant incidents – in particular cyberattacks, data loss or unauthorised access – must be reported to Haberkorn Holding AG immediately upon becoming known.

Our suppliers also commit to establishing appropriate procedures that enable employees and third parties to report legal or compliance violations confidentially and without fear of reprisals.

13. Implementation, documentation and review

Our suppliers commit to establishing effective processes (e.g. risk analyses, preventative measures, remedial action, complaints mechanisms). They are to document compliance with this code and provide relevant proof upon request. Haberkorn or third parties commissioned by Haberkorn are entitled to carry out announced or unannounced inspections. Suppliers also commit to passing the code on to sub-suppliers and ensuring their compliance.