Introduction

Bleckmann is committed to responsible business practices and operations, including engaging with vendors and suppliers that are dedicated to similar principles and holding their own suppliers and subcontractors to the same standards and practices.

Our suppliers play a vital role in upholding Bleckmann's reputation for excellence with employees, business partners, investors, contractors and other important stakeholders. We want to do business with companies that share our values and identify and build relationships with suppliers that follow all applicable laws as well as the spirit and intent of our principles.

As a Bleckmann supplier, it is expected that you and your employees will strive to stay within comparable standards of conduct and will respect the obligations of Bleckmann employees, to adhere to Bleckmann policies and applicable standards. Suppliers are encouraged to have appropriate management systems in place and take steps to comply with this Supplier Code of Conduct, including transparency concerning policies and practices and related employee education.

We encourage our suppliers to hold their suppliers and subcontractors accountable to these standards as well. Bleckmann may take steps to assess a supplier's adherence to this Supplier Code of Conduct. Failure to comply to this Supplier Code of Conduct could jeopardize the business relationship.

For the purposes of this document, "supplier" means any company, corporation or other entity that sells, or seeks to sell goods or services to Bleckmann.



Legend



Environmental

We only have one planet; Bleckmann deeply cares about our natural environment. Suppliers shall comply with all applicable environmental codes, laws, rules and regulations in the place where they operate and ensure that they obtain and maintain all necessary environmental permits and registrations to conduct their business

We expect suppliers to thoroughly familiarize with the topics mentioned below Depending on the nature of purchased products additional requirements may be demanded.



WASTE & RECYCLING



Waste of all kinds should be reduced or eliminated at the source through production modifications, operational processes, materials substitution, conservation, recycling and re-use of materials. Bleckmann expects suppliers to have effective waste management processes in place to ensure waste (including hazardous and e-waste) is processed in a responsible manner. We encourage suppliers to act in accordance with the Refuse, Reduce, Reuse, Refurbish, Recycle philosophy.

Moreover, suppliers should avoid the use of any of the chemicals mentioned on the <u>SIN list</u> (or local equivalent) i.e. asbestos, arsenic, cadmium, chromium compounds, etcetera and should strive to use chemicals with low toxicity and high biodegradability (see <u>EEA</u>).

Environmental



GHG EMISSIONS

Reducing Green House Gas emissions is a pivotal environmental measure. Suppliers should have ambitious targets and effective management procedures in place to reduce their CO2 emissions. Suppliers should be able to demonstrate their efforts to reduce CO2 emissions. Besides CO2, other emissions (i.e. corrosives or ozone depleting chemicals etcetera) should be monitored and discharges should be reduced to the minimum.

Moreover, we encourage suppliers to present the intensity of their products and services. This includes direct (scope 1) as well as indirect (scope 2&3) emissions. We refer to the Greenhouse gas protocol for more information.



Natural Resources

Bleckmann expects suppliers to address its use of (natural) resources, to ensure efficient and sustainable processes are in place with respect to water (inclusive of quantity, quality and risk), raw, processed and non- renewable materials, as well as energy. Suppliers are expected to be able to demonstrate an effective resource management system that incorporates the PDCA cycle for continuous improvement.

Bleckmann expects suppliers to have implemented purchasing policies and procedures which favor sustainable and locally produced goods and services in preference of imported products wherever possible and reasonable.

Environmental



Protection of Environment

Suppliers shall have a program in place to continuously minimize negative environmental impacts of their full product/service lifecycle and minimize their product/service carbon footprint as a result. Suppliers are expected to comply with existing legislation and regulations regarding the protection of the environment.

Bleckmann encourages suppliers to surpass environmental regulations and expects suppliers to mitigate negative impacts, such as deforestation and air, water and soil pollution, as well as impacts that cause loss of biodiversity and harm ecosystems.

Social

Bleckmann provides superb supply chain solutions for our clients. We do this together with our dedicated employees who care deeply about the promises towards our clients and the well-being of each other. Bleckmann believes in advancing the <u>United Nations Global Compact</u>'s (UNGC) ten universally accepted principles in the areas of human rights, labor, environment, and anti corruption as well as the seventeen <u>Sustainable Development Goals</u>.

Moreover, Bleckmann respects the articles contained in the Universal Declaration of Human Rights and expects suppliers to the same. Bleckmann is committed to combatting modern slavery, educating employees and encouraging its partners and the broader business community to take a stand against human trafficking.



EMPLOYMENT CONDITIONS



Bleckmann expects suppliers to provide a safe, healthy and secure workplace that is free of harassment, sexual abuse, corporal punishment, mental or physical coercion; nor is there to be the threat of any such treatment. The working place should be a hospitable environment. This includes access to drinkable water, sanitary facilities, fire safety, emergency preparedness and response, industrial hygiene, adequate lighting and ventilation, safeguarding against occupational injury and illness and subject to regular health and safety reviews, with corrective action being taken where necessary.

Suppliers shall comply with local laws and industry standards regarding payment, working hours (including overtime), rest days and public holidays and will ensure employees have reasonable daily and weekly work schedules. Bleckmann expects suppliers shall compensate workers in compliance with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Suppliers will not permit deductions from wages as a disciplinary measure.

Social



HUMAN RIGHTS

Bleckmann expects suppliers to recognize and be committed to upholding the human rights of workers, and to treat them with dignity and respect. All work will be voluntary, and workers should be free to terminate their employment upon reasonable notice.

All personnel actions, including recruiting, hiring, assignment and promotion, as well as decisions affecting compensation, benefits, transfers and training, shall be made without regard to creed, race, color, age, gender, sexual orientation, ethnicity, mental or physical disability, religion, political affiliation, health condition, pregnancy, union membership, marital status, or any other status protected by law.

Suppliers shall not use any form of child labor, as defined by Principle Five of the UN Global Compact, in any of their facilities. Suppliers shall adhere to minimum age provisions as applicable by local laws and regulations and shall not use workers under the legal age for employment. Children should be protected from any kind of labor that may be hazardous to their health or interferes with their education.



HEALTH & SAFETY

Suppliers are responsible for upholding a safe and healthy work environment. Suppliers' production and associated services shall comply with workers' health and safety regulation, human rights guidelines, per the <u>International Labor Organization</u>, and environmental protection laws in the country of production. In cases where worker housing in provided, the housing must meet the health and safety standards outlined herein.

Procedures and systems are to be in place to manage, track and report occupational injury and illness, including provisions to: I) encourage worker reporting; II) classify and record injury and illness cases; III) provide necessary medical treatment; IV) investigate cases and implement corrective actions to eliminate their causes; and V) facilitate the return of workers to work. Employees should receive training on safety, including, where appropriate, proper use of equipment, chemicals, and use of personal protective equipment.

Governance

Doing business in an honest, fair, cooperative and transparent manner is the cornerstone of a long lasting mutually beneficial business relationship. Bleckmann has a long history of succeeding through honest business competition.

Our suppliers are expected to act with the highest standard of integrity when conducting business with or on behalf of Bleckmann. We compete on the basis of price, service and quality, and we award business on the same basis.

Suppliers shall comply with legal requirements regarding fair competition and accurate marketing. They shall act confidentially, lawfully, and with integrity when handling competitive and proprietary information.

COMPLIANCE WITH LEGISLATION

Suppliers must follow all relevant national and local laws and regulations, including those related to labor, health and safety, bribery, corruption, money laundering, and the environment.



Suppliers are expected to inform their Bleckmann contact person should there be any significant breaches, allegations of non-compliance or investigation into non-compliance by authorities related to any of the goods or services that the supplier provides to Bleckmann, and may materially affect a Supplier's ability to provide goods or services to Bleckmann.

Suppliers shall comply with all legal requirements regarding fair competition and accurate marketing. They shall act confidentially, lawfully, and with integrity when handling competitive and proprietary information.

Governance



TRANSPARENCY & MONITORING

Suppliers shall accurately and fully disclose any requested or relevant information regarding their business activities, structure, financial situation and performance on Bleckmann's behalf, which may affect the performance of their contract with Bleckmann, in accordance with applicable laws and regulations.

Bleckmann encourages suppliers to have a process for timely corrective action of any violations or non-compliance identified and provide its employees with an anonymous complaint mechanism to report workplace grievances

DATA PROTECTION & SECURITY

Bleckmann expects suppliers to implement appropriate confidentiality measures to protect the privacy.



Moreover, suppliers safeguard customer, client and employee information and the transfer of technology, services and know-how in a manner that protects any applicable international, national and local intellectual property and data protection rights This includes effectively safeguard information and intellectual property regarding business activities, financial situation, performance, and/or any other information deemed confidential.

Governance



BUSINESS INTEGRITY

Bleckmann expects suppliers to engage in fair play and honesty without coercion, conspiracy, bribery, corruption or abuse of economic power. Suppliers shall forbid giving or promising anything of value to a government official or employee, whether to influence that person in his or her official duties or to encourage unlawful conduct.

Bleckmann only uses gifts and entertainment to develop or strengthen business relations, to show appreciation or to create goodwill when appropriate. Appropriate here means well-timed, moderate, infrequent and not in excess of locally acceptable business practices. Bleckmann expects suppliers will ensure that gifts or entertainment are modest and within Bleckmann's guidelines.



MANAGEMENT SYSTEM

Bleckmann is committed to upholding the highest standards regarding the social and environmental integrity of its supply chain, and expects suppliers to have implemented effective management systems to ensure business intelligence information regarding social and environmental performance is considered robust and free of material mistakes.

Bleckmann expects that suppliers implement or maintain, as applicable, management systems that facilitate compliance with all applicable laws, identify and mitigate related operational risks, and undertake continuous improvement as appropriate. Bleckmann encourages suppliers to inform and/or train staff on the aforementioned topics and to track and communicate progress regarding these efforts.

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Suppliers shall report any violations or suspected violations of applicable laws, regulations and this Code of Conduct to Bleckmann.

To report a violate on confidentially, please click on the following <u>link</u>

