



# Code of conduct 4a manufacturing GmbH

## 1 Introduction/Preamble

4a manufacturing GmbH is committed to ecologically and socially responsible corporate governance. We expect the same behavior from all our suppliers. For our employees, we also require that the principles of ecological, social and ethical behavior are observed and integrated into the corporate culture. Furthermore, we strive to continuously optimize our entrepreneurial activities and our products and services in the sense of sustainability and urge our employees and suppliers to contribute to this in the sense of a holistic approach.

For the future cooperation, the contracting parties agree on the validity of the following provisions for a common code of conduct. This agreement is the basis for all future deliveries. The parties to the contract undertake to comply with the principles and requirements of the Code of Conduct. Suppliers are required to contractually subcontract their subcontractors to comply with the standards and regulations set out in this document. This Agreement enters into force upon signature. A breach of this Code of Conduct may give the Company cause to terminate the business relationship, including any related supply agreements.

The code of conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Entrepreneurship, the United Nations Guidelines on Business and Economics, Human Rights "and international labor standards of the International Labor Organization. We expect our suppliers to comply with all relevant laws and regulations as well as the requirements of standards.

## 2 Requirements for suppliers

### 2.1 Social Responsibility

- Exclusion of forced labor

No forced labor, slave labor or similar work may be used. Every job must be voluntary, and employees must be able to finish their work or employment at any time. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment.

- Prohibition of child labor

Child labor must not be used in any phase of production. Suppliers are encouraged to follow the recommendation of the ILO Conventions on the Minimum Age for the Employment of Children. Accordingly, the age should not be less than the age at which the compulsory education ends and, in any case, not less than 15 years.

- Fair remuneration

The remuneration paid to the workers must comply with all applicable laws on remuneration, including, for example laws on minimum wages or overtime. If the statutory minimum wage is

insufficient to cover the cost of living, the business partner is obliged to pay a fee that meets the basic needs. Wage deductions as punitive measures are not permitted. The basis on which workers are remunerated is continuously communicated to employees through a pay slip.

- Fair working hours

Working hours must comply with applicable laws or industry standards

- Freedom of association

The supplier respects the right of the workers to freedom of association in accordance with local laws. The workforce must be able to communicate openly with management without fear of reprisal or harassment.

- Discrimination

Discrimination against employees in any form is prohibited. This applies for example for discrimination based on sex, race, caste, skin color, disability, political belief, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

- Health; Safety at work

The supplier is responsible for a safe and healthy working environment. The establishment and application of adequate occupational health and safety systems will take necessary preventive measures against accidents and health damage that may arise in connection with the activity. In addition, employees are regularly informed and trained about applicable health and safety standards and measures. Employees will be given sufficient access to drinking water and access to clean sanitary facilities.

- Handling conflict minerals

For the conflict minerals tin, tungsten, tantalum, and gold, as well as for other commodities such as cobalt, the company is establishing processes responsible for compliance with due diligence requirements in accordance with the Organization for Economic Cooperation and Development (OECD) guidelines Supply chains for minerals from conflict and high risk areas and expects this also from its supplier. Smelters and refineries without adequate, audited due diligence processes should be avoided.

## **2.2 Ecological responsibility**

- Treatment and discharge of industrial wastewater

Wastewater from operations, manufacturing processes and sanitary facilities must be typed, monitored, inspected and, if necessary, treated prior to discharge or disposal. In addition, measures should be introduced to reduce the production of wastewater.

- Handling of air emissions

General emissions from operations (air and noise emissions) as well as greenhouse gas emissions shall be typed, routinely monitored, reviewed and, if necessary, treated prior to their release. The

supplier also has the task of monitoring its emission control systems and is required to find economical solutions to minimize any emissions.

- Handling of waste and hazardous substances

The supplier follows a systematic approach to identify, handle, reduce, and dispose of or recycle solid waste in a responsible manner. Chemicals or other materials that are hazardous to their release into the environment shall be identified and handled in such a way as to ensure safety when handling, transporting, storing, using, recycling or reusing them and disposing of them is.

- Reduction of consumption of raw materials and natural resources

The use and consumption of resources during production and the production of waste of all kinds, including water and energy, should be reduced or avoided. Either directly at the point of origin or through procedures and measures, such as changing production and maintenance processes or processes within the company, using alternative materials, saving, recycling or reusing materials.

- Handling energy consumption / efficiency

Energy consumption must be monitored and documented. There are economic solutions to improve energy efficiency and minimize energy consumption.

## 2.3 Ethical Business behavior

- Fair Competition

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws are applicable, which prohibit in particular agreements and other activities that affect prices or conditions when dealing with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers with which customers are to be restricted in their freedom to autonomously determine their prices and other conditions for resale.

- Confidentiality / Privacy

The Supplier undertakes, in respect of the protection of private information, to meet the reasonable expectations of its client, its suppliers, customers, consumers and employees. The supplier must comply with the laws on data protection and information security and regulatory requirements when collecting, storing, processing, transmitting and disclosing personal information.

Security incidents or possible security gaps must be reported immediately by the Supplier to the Information Security Officer (ISO) at **security@4a.at**.

Data protection incidents must be reported immediately to the Data Protection Officer (DPO) at **datenschutz@4a.at** or **privacy@4a.at**.

- Intellectual property/Plagiarism

Intellectual property rights must be respected; Technology and know-how transfer must be carried out in a way that protects intellectual property rights and customer information. The use of plagiarism or counterfeit materials is strictly prohibited.

- Integrity / Bribery, Benefit

All business activities must be based on the highest integrity standards. The Supplier must follow a zero-tolerance policy in the prohibition of all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards must be applied to ensure compliance with anti-corruption legislation.

### **3 Implementation of the requirements**

We expect our supply chain suppliers to identify risks within them and take appropriate action. In the event of a suspected breach and to secure supply chains with increased risks, the company requires the disclosure of supply chains.

Compliance with the standards and regulations listed in this document is verified by the company using a self-assessment questionnaire and sustainability audits at suppliers' production sites.

In relation to suppliers who do not meet these requirements, the company reserves the right to take appropriate measures, which may ultimately lead to the suspension or termination of a supply relationship.

### **4 Notice and consent of supplier**

By signing this document, the supplier undertakes to act responsibly and to adhere to the stated principles/requirements. Supplier acknowledges that it effectively communicates to employees, agents, subcontractors and suppliers the contents of this Code and assures that all necessary arrangements will be properly implemented.

Date:

Date:

4a manufacturing GmbH

Supplier