

# HUMMEL AG

## Supplier Code of Conduct

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## Preamble

Adhering to legal standards is a fundamental part of our beliefs. As a global company, HUMMEL AG sources and distributes products worldwide. Social, ecological, and ethical principles are core to our business activities and are non-negotiable.

We place the highest value on responsible, collaborative relationships with our suppliers. We expect them to adhere to applicable laws, regulations, and internationally recognised Environmental, Social, and Governance (ESG) standards. Furthermore, we expect our suppliers to uphold these standards across their supply chains.

In line with this responsibility, HUMMEL AG requires that all suppliers acknowledge, support, implement, and comply with the following Supplier Code of Conduct, which is aligned with ESG standards.

Help us uphold the principles of sustainable development within our supply chain!

Thank you.

## Quality Policy / Product Safety

We maintain the highest standards for the quality and safety of our products and services.

## Supply Security

You are responsible for monitoring the quality of components in the market and helping us prevent risks, such as supply bottlenecks. This ensures we deliver the highest quality and supply security in the market.

## Raw Material Policy

You must not supply products that contain conflict minerals which directly or indirectly finance armed groups or contribute to human rights abuses. We expect you to fulfil your due diligence responsibilities regarding the supply chain of conflict minerals, following OECD guidelines. Your products should be as sustainable as possible and comply with relevant laws, such as the EU regulation on deforestation-free supply chains.

## Antitrust Law and Trade Control

You must comply with applicable national, European, and international trade laws, as well as international legal standards, particularly (but not limited to) antitrust and competition law, customs and import regulations, export controls of national and third-party states, and regulations on economic and military sanctions.

## Corruption, Bribery, and Money Laundering

Your company must have zero tolerance for illegal and unethical practices, such as bribery and corruption. You are expected to combat corruption, bribery, and any other form of unlawful advantage and to refrain from any activities related to money laundering.

## Data Protection, Information Security, and Confidentiality

You are responsible for respecting the privacy and confidentiality of information related to your employees, customers, and business partners, ensuring data protection in compliance with GDPR and BDSG. Intellectual property, patents, and copyrights must be respected, and measures must be implemented to prevent misuse in the relevant areas.

## Social Responsibility

As a global company, we are aware of our social responsibility and expect the same from our suppliers:

- Fair Wages and Working Hours

You must comply with minimum wage and working hours regulations in line with national and local laws. You are also required to provide a living wage that considers local living conditions.

- Health and Safety

You must ensure a safe and healthy working environment for your employees, adhering to applicable laws. Potential risks to health and safety must be appropriately assessed, and necessary protective measures must be implemented. Every employee is responsible for familiarising themselves with the regulations in their area and ensuring compliance.

- Non-Discrimination

You must treat employees fairly, with courtesy and respect. The workplace must be free from harassment, unlawful discrimination, or degrading treatment. In particular, no one should be discriminated against on the grounds of ethnicity, disability, gender, religion, age, or sexual orientation.

- Human Rights

Human rights are universal, inalienable, and indivisible. You must support the protection of internationally declared human rights, combatting all forms of forced labour, slavery, and child labour. You must adhere to ILO conventions on minimum working age when

employing minors. No behaviour that contributes to or supports human rights violations will be tolerated. In cases of human rights violations, appropriate corrective measures must be taken.

- Freedom of Association

Suppliers must recognise and respect employees' rights to freely join or refrain from joining any legitimate organisation. Suppliers must recognise the right of their employees to form or join unions and engage in collective bargaining. Employees should be free to make informed decisions about union membership without coercion. Where employee representation exists, suppliers must foster positive, business-focused relationships with representatives while continuing to meet their obligations to all staff.

- Security Forces

Suppliers must ensure that any public or private security forces they employ or use have no record or suspicion of involvement in human rights abuses. Contracts with security forces must guarantee compliance with the legal framework and the protection of human rights. Suppliers must also ensure that their security personnel are adequately trained and their conduct is regularly monitored. Security personnel must not engage in torture or cruel, inhumane, or degrading treatment, nor should they threaten life or violate the freedom of association.

## Environmental Responsibility

Environmental responsibility is about our commitment to preserving the natural world. Each of us has a part to play in protecting the environment.

- Environmental Protection

You must comply with all relevant environmental, health, and safety regulations. You should promote the safe, environmentally friendly development, production, transport, use, and disposal of your products.

- Efficient Use of Resources, Waste, Emissions, and Energy

You must use resources efficiently, employ energy-saving and environmentally friendly technologies, and work to reduce waste and emissions into air, water, and soil. You are expected to use natural resources and energy sparingly and responsibly and to comply with all relevant laws and regulations, including the EURD.

## Implementation of the Supplier Code of Conduct

We expect suppliers to identify risks in their supply chains and take appropriate actions to mitigate them. This will ensure the principles of sustainable development are upheld.

By acknowledging this Supplier Code of Conduct, you agree to the principles and behaviours it promotes and commit to implementing them through your code of conduct and risk management system, which must include monitoring these standards.

HUMMEL AG reserves the right to verify compliance with these standards through individual queries or audits. HUMMEL AG will take appropriate action if violations of laws, standards, or regulations are identified. In such cases, HUMMEL AG reserves the right to suspend or terminate business relationships if corrective actions are not taken or violations are evident.

Compliance with laws and internal regulations is central to our identity and of the utmost priority to HUMMEL AG. To this end, we have established a whistleblower system, which allows incidents to be reported 24/7. Technical measures ensure anonymity for those who wish to remain anonymous. This guarantees that reports of violations, particularly those with high risks for the company and its employees, are investigated fairly and appropriately.

Please help us by reporting legal violations or breaches of rules related to HUMMEL AG via our website: <https://www.hummel.com/de/support/compliance/>.

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