



CODE OF CONDUCT

FOR SUPPLIERS

CODE OF CONDUCT FOR SUPPLIERS OF TH. GEYER

As a medium-sized, family-run company, it is our responsibility to all participants along the value chain to build a sustainable, social, economic and ecological economic structure and to provide future generations with a stable basis for living and working. Th. Geyer respects the cultural, ethical, religious, social and political diversity of nations and societies.

In recognition of these principles, Th. Geyer has introduced a Code of Conduct for Suppliers. It expands our own standards for a social and ecological environment, as set out in our Corporate Code of Conduct, to include our suppliers and thus makes them an integral part of our sustainability strategy. Th. Geyer expects suppliers to comply with national and international regulations and legislation.

This includes the United Nations Global Compact, the regulations of the International Labour Organisation (ILO), the OECD's economic policies and the Charter of Fundamental Rights of the European Union.

We also expect our suppliers to comply with the principles and requirements for their subsidiaries and upstream suppliers. We also expect them to introduce suitable processes in their organisations to promote compliance with the applicable requirements and legislation as well as the Th. Geyer Code of Conduct for Suppliers.

Th. Geyer expressly supports and encourages its business partners to incorporate this Code of Conduct into their own corporate policies. The Code of Conduct for Suppliers is circulated both among Th. Geyer employees and its suppliers. We use self-disclosure and supplier questionnaires to ensure that our suppliers comply with the principles below.

Changes and modifications to the aforementioned regulations and legislation may also result in amendments to the Code of Conduct for Suppliers.

Renningen, 1 December 2023



Oliver-Alexander Geyer
Managing Partner



Ralf Streicher
Managing Partner



André Meise
Managing Director



PRINCIPLES AND MEASURES

HUMAN RIGHTS

Principle 1: Our suppliers shall support and respect the protection of internationally proclaimed human rights within their sphere of influence.

The Declaration of Human Rights is the fundamental basis for all internal company processes. Th. Geyer expects its suppliers to safeguard human rights both at the workplace and within in the company's general sphere of operations.

Principle 2: Our suppliers shall ensure that they are not complicit in any violations against human rights

Due to its global business relationships, Th. Geyer is aware of its international responsibility. Therefore, Th. Geyer expects its suppliers not to maintain any business contacts with companies that violate human rights and to distance themselves from such activities. Th. Geyer also expects its suppliers to comply with the guidelines on occupational health and safety published by the International Labour Organisation (ILO).

LABOUR STANDARDS

Principle 3: Our suppliers shall uphold the freedom of association and recognise in effect the right to collective bargaining.

Our suppliers shall recognise and respect the right of workers to form or join organisations in accordance with ILO Convention No. 87 (Freedom of Association and Protection of the Right to Organise Convention, 1948) in order to make their voices heard on a formal legal basis. Due regard shall be given to national circumstances. Similarly, the right to conduct collective bargaining in accordance with ILO Convention No. 98 (Right to Organise and Collective Bargaining Convention, 1949) shall not be adversely affected.

Principle 4: Our suppliers shall support the elimination of all forms of forced labour.

Our suppliers shall expressly undertake to prohibit all forms of forced labour in accordance with ILO Convention No. 29 (Forced Labour Convention, 1930) and No. 105 (Abolition of Forced Labour Convention, 1957). All labour shall be voluntary and every employee shall have the right to terminate an employment relationship with reasonable notice.

Principle 5: Our suppliers shall comply with national labour standards regarding wages, benefits and working hours.

Furthermore, our suppliers shall base their reasonable remuneration scheme on nationally applicable legislation, on the existing labour market situation and observe national legislation governing working hours. Employees shall be granted regular paid holidays in accordance with national legislation.

Principle 6: Our suppliers shall advocate the abolition of child labour.

Our suppliers shall only employ workers who are above the legal minimum age in accordance with the Convention on the Rights of the Child and ILO Convention No. 138 (Minimum Age Convention, 1973). Furthermore, they shall refuse to tolerate any form of exploitative child labour. The supplier shall prohibit work that exposes young employees to hazards.

Principle 7: Our suppliers shall maintain and promote health and safety at the workplace.

We expect our suppliers to fully comply with applicable national laws on health and safety at the workplace. This shall include the identification of actual and potential health and safety risks at the workplace and the training of employees to prevent accidents and occupational illnesses as far as possible. Our suppliers shall also ensure compliance with nationally applicable working time regulations.

Principle 8: Our suppliers shall promote diversity.

Our suppliers shall not tolerate any discrimination at the workplace based on gender, ethnic origin, social or religious background, skin colour, nationality, age, sexual orientation, disability, marital status, health status or any other grounds prohibited by law. Our suppliers shall actively promote inclusion and diversity within their organisation, for example through relations with companies where diversity is a priority or where companies are managed by under-represented groups, in analogy to the practice at Th. Geyer.

ENVIRONMENTAL PROTECTION

Principle 9: Our suppliers shall respect the protection of the environment.

Th. Geyer expects its suppliers to comply with all applicable national laws, regulations and standards governing the protection of the environment. The aim is to minimise environmental pollution and environmental hazards and to improve environmental protection in daily operations, particularly in the use of products and materials as well as shipping practices along the supply chain. Preventive measures shall ensure that no avoidable and, above all, irreversible damage can occur. Compliance shall be ensured with legislation and guidelines for handling products and chemicals. Regular training as a preventive measure shall continue to represent a precautionary instrument in the event of environmental issues.

Principle 10: Our suppliers shall take the initiative to create a greater sense of responsibility for the environment.

Th. Geyer expects its suppliers to adopt an organised and systematic approach to environmental issues. The formulation of objectives and compliance with existing laws, regulations and permits shall provide the basis for company-wide action.

Principle 11: Our suppliers shall promote the development and deployment of eco-friendly technologies.

Our suppliers shall be committed to a sustainable, stable and ecologically sound business policy. Efficient, modern and eco-friendly technologies shall be promoted and introduced wherever possible.

DUE DILIGENCE IN SUPPLY CHAINS

Principle 12: Our suppliers shall ensure due diligence in supply chains.

Th. Geyer expects its suppliers to comply with human rights and environment-related due diligence obligations and to pass them on within the supply chains of business partners to the extent possible and applicable, as described in the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) and in the questionnaire for the report of the Federal Office for Economics and Export Control (BAFA).

CONFLICT MINERALS

Principle 13: Our suppliers shall commit to the sustainable sourcing of conflict minerals.

Th. Geyer expects its suppliers to commit to the responsible sourcing of conflict minerals and to comply with all applicable laws and international standards. In particular, this shall include the EU Conflict Minerals Regulation (EU 2017/821), the Dodd-Frank Act (Art. 1502) and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

FIGHT AGAINST CORRUPTION

Principle 14: Our suppliers shall work to combat corruption in all its forms, including extortion and bribery.

Our suppliers shall undertake to prevent all forms of bribery. Compliance shall be ensured with all regulations of the United Nations (UN) and the Organisation for Economic Co-operation and Development (OECD) as well as the applicable laws on the prevention of corruption, bribery and money laundering. The high ethical standards set by Th. Geyer in its own company shall also be implemented by its business partners. We shall expressly distance ourselves from partners within supply chains who fail to adhere to this principle.

COMPLIANCE WITH THE CODE OF CONDUCT FOR SUPPLIERS

Principle 15: Our suppliers shall comply with the principles set out herein.

Th. Geyer expects its suppliers to pass on the principles of the Code of Conduct for Suppliers to their subcontractors and suppliers and also to consider such subcontractors and suppliers in their selection process.

If there is a suspicion that a supplier is violating these principles (e.g. due to negative media reports), Th. Geyer shall reserve the right to demand disclosure of all the relevant information.

Furthermore, Th. Geyer shall reserve the right to terminate any transactions with suppliers who clearly and demonstrably violate the Th. Geyer Code of Conduct for Suppliers and/or who do not strive for or fail to introduce measures to improve their sustainability performance.

REFERENCES

UN Global Compact
www.unglobalcompact.org

International Labour Organisation ILO
www.ilo.org

Universal Declaration of Human Rights, dated 10 December 1948
www.ohchr.org

Organisation for Economic Co-operation and Development
www.oecd.org

United Nations Convention against Corruption
www.unodc.org

This declaration came into force on 1 December 2023.

www.thgeyer.com