Code of Conduct for Suppliers of the



R. Schramm GmbH Hochstraß Süd 9 83064 Raubling

and

Dr.-Steinbeißer-Str. 7 83026 Rosenheim

and

Gewerbepark 9 84183 Niederviehbach

Version: 1

Stand: 31.12.2024

Created by:	Approved by:
M. Ruthmann	G. Schramm
<u>Date:</u> 31.12.2024	<u>Date:</u> 31.12.2024



Table of contents

1	This Code of Conduct	3
2	Laws and ethical principles Duty of care: Focus on the rights of all people Compliance with legal requirements	4
	2.1 Child labor and young (underage) workers Protection of children and adolescents	4
	2.2 Forced labor and modern slavery	4
	2.3 Remuneration Wages, social benefits and working hours	5
	2.4 Freedom of association and collective bargaining	5
	2.5 Diversity, harassment and non-discrimination	5
	2.6 Occupational health and safety	6
3	Business ethics	6
	3.1 Data protection and disclosure of information	6
	3.2 Corruption, bribery and extortion	6
	3.3 Trade regulations (export controls and economic sanctions)	7
	3.4 Money laundering and financial records	7
	3.5 Fair competition and antitrust law	7
	3.6 Conflicts of interest	7
	3.7 Whistleblowing and protection against retaliation	7
4	Environment	7
5	Planning for business continuity	8
6	Dialogue with business partners - subcontractor management	9
7	Compliance with the Code of Conduct for Suppliers	C

Created/modified: Tested/released:

Name: M.Ruthmann G. Schramm

Date: 31.12.2024 31.12.2024 Page 2 of 8



1 This Code of Conduct

Since its foundation more than 30 years ago, the corporate activities of R. Schramm GmbH have been characterized by responsibility, fairness, quality and integrity.

The company's success is largely based on integrity, compliance with the law and fairness as well as respectful cooperation.

We are fully aware of our responsibility towards our customers, employees and the organizations in which we operate. We have therefore established strict ethical principles for ourselves that guide us in our business activities.

Within this framework, we are committed to promoting healthy working conditions and environmental responsibility throughout the supply chain.

The Code of Conduct for Suppliers of R. Schramm GmbH is based on the principles of the United Nations Global Compact (UNGC) and the core labor standards of the International Labor Organization (ILO).

R. Schramm GmbH expects the following in summary from its suppliers and service providers

- Compliance with the applicable legal and ethical framework conditions
- Compliance with competition and antitrust law in particular
- Refraining from exerting any influence on the official decisions of Schramm employees through benefits or other advantages
- Observance of guidelines be it our own principles or the Schramm guidelines
- Informing the management of suspected cases of corruption in the course of cooperation

Suppliers are provided with this Code of Conduct in the expectation that the principles set out here will be respected and complied with. We expect our suppliers, i.e. all companies that have a business relationship with R. Schramm GmbH, to base their actions on the same ethical principles.

This R. Schramm GmbH Code of Conduct for Suppliers sets the minimum standard for business relationships with us.

Created/modified: Tested/released:

Name: M.Ruthmann G. Schramm

Date: 31.12.2024 31.12.2024 Page 3 of 8



2 Laws and ethical principles Duty of care: Focusing on the rights of all people Compliance with legal requirements

- The Supplier shall comply with all laws applicable to its business. The supplier supports the following principles in accordance with national laws and customs.
- of the United Nations Global Compact,
- of the Universal Declaration of Human Rights ("UN Universal Declaration of Human Rights")
- and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work ("1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work").

This applies in particular to:

2.1 Child labor and young (underage) workers Protection of children and young people

We condemn any form of exploitation of children and young workers. The supplier also undertakes within its supply chain not to employ children and young workers who have not yet reached the minimum age agreed under the ILO Convention. Every child and young worker must be protected from economic exploitation. Every young worker must also be protected from having to carry out work that is classified as hazardous, has a negative impact on their education or impairs their healthy development.

2.2 Forced labor and modern slavery

Committed against forced and compulsory labor

The Supplier does not use forced, bonded or involuntary labor. Labor must always be voluntary. Workers must be allowed to retain control of their identification documents (e.g. passport, work permit or any other personal legal document). Supplier shall ensure that workers do not pay any fees or other payments to be employed during the entire recruitment phase and employment period. Supplier shall be responsible for the payment of all legally binding fees and expenses (e.g. licenses and duties) that may be incurred in connection with its employees. Punishment, psychological and/or physical coercion are prohibited. Disciplinary policies and procedures shall be clearly defined and communicated to employees.

Created/modified: Tested/released:

Name: M.Ruthmann G. Schramm

Date: 31.12.2024 31.12.2024 Page 4 of 8



2.3 Remuneration Wages, benefits and working hours

Creating a pleasant working environment

The Supplier shall comply with all applicable national laws and binding industry standards regarding working hours, overtime, wages and salaries and other employer benefits. Supplier shall pay employees promptly and clearly communicate to employees the basis on which they are paid. Deductions from wages and salaries as a disciplinary measure are not permitted unless they are legally permissible.

2.4 Freedom of association and collective bargaining

The Supplier's employees must have the free choice to join or not to join a union/employee representation of their choice without threat or intimidation. The Supplier recognizes and respects the right to bargain collectively within the framework of applicable laws.

2.5 Diversity, harassment and non-discrimination

Suppliers are expected to create a respectful and non-judgmental work environment free from discrimination, intimidation and harassment. The supplier promotes a working environment that enables inclusion, in which the diversity of its employees is valued and any form of discrimination, harassment or bullying has no place.

Unequal treatment of employees in any form is not permitted unless it is justified by the requirements of employment. Discrimination on the basis of gender, race, caste, national, ethnic or social origin, skin color, disability, health status, political conviction, origin, ideology, religion, age, pregnancy or sexual orientation is prohibited.

The personal dignity, privacy and personal rights of each individual must be respected.

The supplier undertakes to ensure equal rights for men and women, to protect the rights of vulnerable groups within its companies and supply chains, in particular the rights of minorities, indigenous peoples, women, children and migrant workers. In addition, the supplier should introduce and implement internal measures to ensure equal pay and equal opportunities at all levels of employment. In particular, the recruitment process should be as ethical, sustainable, transparent and respectful as possible and without any discrimination (ethical recruitment).

Created/modified: Tested/released:

Name: M.Ruthmann G. Schramm

Date: 31.12.2024 31.12.2024 Page 5 of 8



2.6 Occupational health and safety

We expect our business partners to strive for a high level of occupational health and safety implementation by applying a health and safety management approach appropriate to their business.

The supplier shall comply with applicable occupational health and safety regulations and ensure a safe and healthy working environment in order to maintain the health of employees, protect third parties and prevent accidents, injuries and work-related illnesses. This includes regular risk assessments of workplaces and the implementation of suitable hazard prevention and precautionary measures. Employees must receive appropriate training in occupational health and safety issues.

3 Business ethics

3.1 Data protection and disclosure of information

The Supplier shall comply with the applicable data protection and security laws and regulations. This applies in particular with regard to personal data of customers, consumers, employees and shareholders. The Supplier shall comply with all such requirements when collecting, processing, transferring or using personal data.

The Supplier shall protect confidential information and use it only in an appropriate manner. This means that the Supplier shall not disclose any information that is not known to the public. The supplier undertakes to protect the intellectual property of R. Schramm GmbH and not to use it for unfair purposes. Intellectual property of R. Schramm GmbH may only be used in business cooperation with R. Schramm GmbH. If there is any suspicion of plagiarism, the supplier must inform R. Schramm GmbH immediately

3.2 Corruption, bribery and extortion

The Supplier shall work against all forms of corruption, including bribery and extortion.

The Supplier shall comply with all applicable national and international anti-corruption rules, laws, regulations and standards. The Supplier shall not offer or promise anything of value (either directly or indirectly) to improperly influence official actions or to obtain an improper advantage in order to induce or obtain business.

3.3 Trade regulations (export controls and economic sanctions)

The Supplier shall comply with all applicable trade and import regulations (export controls), including sanctions and embargoes, that apply to its work.

3.4 Money laundering and financial records

The Supplier shall comply with all applicable anti-money laundering laws and regulations. The Supplier shall maintain financial records (financial responsibility) and prepare reports in accordance with international laws and regulations.

Created/modified: Tested/released:

Name: M.Ruthmann G. Schramm

Date: 31.12.2024 31.12.2024 Page 6 of 8



3.5 Fair competition and antitrust law

Fair market position, compliance with anti-trust laws

The supplier complies with applicable competition and antitrust laws. The supplier respects fair competition and complies with the prohibition of agreements with competitors and other measures that hinder the free market.

3.6 Conflicts of interest

Awareness of possible conflicts of interest

A conflict of interest arises when a person has a private/personal interest that could influence their decisions. Such conflicts of interest include kinship or affinity, partnership, business partnership or investment. The supplier shall disclose any actual or potential conflict of interest to the R. Schramm GmbH management.

3.7 Whistleblowing and protection from retaliation

We encourage everyone to report irregularities or violations of the provisions of this Code of Conduct for Suppliers.

We guarantee the greatest possible protection of data, confidentiality of your identity and personal rights for all reports.

4 Environment

The supplier must comply with all applicable environmental regulations (including land, forest and water rights) and align its production and services with the concept of sustainability. This includes the best possible protection of the environment, careful use of resources and successful energy conservation. The Supplier shall comply with all applicable environmental laws, regulations and standards and operate an effective system to identify and eliminate potential environmental hazards.

It is desirable that the supplier establishes an environmental management system in accordance with DIN EN ISO 14001 or otherwise ensures compliance with environmental requirements and can provide evidence of this.

We expect our business partners to endeavor to support the environmental protection goals of R. Schramm GmbH through the goods and services they supply, but also, for example, by providing appropriate data on environmental and climate protection. In this context, we also expect our suppliers to take appropriate account of environmental and climate protection in their own operational activities, e.g. by setting themselves protection targets and implementing them accordingly.

The supplier should implement the following measures:

 Reduction of greenhouse gas emissions/CO2 emissions (decarbonization e.g. through the use of low-carbon energy sources), reporting on greenhouse gas emissions,

Created/modified: Tested/released:

Name: M.Ruthmann G. Schramm

Date: 31.12.2024 31.12.2024 Page 7 of 8



- Exploiting the potential of energy efficiency and renewable energies
- Sustainable water management, in particular careful use of water consumption and preservation of water quality
- Finding and exploiting ways to continuously improve air quality
- Sustainable land use (avoiding deforestation) to protect the livelihoods of people and animals and to preserve biodiversity and soil quality.
- Responsible management of sustainable resources and waste reduction
- Establish responsible chemicals management.

5 Planning for business continuity

The Supplier shall take precautionary measures in the event of disruptions to its business activities (e.g. natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases). The precautionary measures include, in particular, disaster plans to protect employees and the environment as far as possible from the effects of possible disasters in the area of business activities.

6 Dialogue with business partners - sub-supplier management

The supplier encourages its own suppliers to comply with the Code of Conduct for Suppliers as part of the fulfillment of their contractual obligations.

7 Compliance with the Code of Conduct for Suppliers

R. Schramm GmbH reserves the right to verify compliance with the requirements of the Code of Conduct for Suppliers after reasonable advance notice.

R. Schramm GmbH encourages its suppliers to introduce their own binding guidelines for ethical behavior.

Any breach of the obligations set out in the Supplier Code of Conduct will be considered a material breach of contract by the supplier.

This Code comes into force on 01.01.2025.				
Signature / Position				
R.Schramm GmbH Conveyor technology and automation				

Created/modified: Tested/released:

Name: M.Ruthmann G. Schramm

Date: 31.12.2024 31.12.2024 Page 8 of 8