

Code of Conduct for Suppliers (status 04 | 2025)

1. Introduction

The Code of Conduct for Suppliers defines the principles and requirements for suppliers of Klüh Service Management GmbH with regard to acting with integrity and compliance with ethical standards and applicable law.

Klüh expects its suppliers to implement and comply with the following standards in their company. This applies not only to business activities with Klüh, but also in relation to other customers, contractual partners, competitors and the public sector. In addition, Klüh's suppliers are required to make an equal effort to ensure that their own business partners comply with the principles set out in this Code of Conduct.

This Code of Conduct applies to all suppliers of goods and services of Klüh Service Management GmbH and its affiliated companies.

2. Compliance with laws and regulations

The supplier assures to comply with all relevant national and international laws and regulations in connection with the provision of goods and services for Klüh Service Management GmbH and to keep himself regularly informed about them.

3. Request from suppliers

For future cooperation, the contracting parties agree that the following guidelines for a joint code of conduct shall apply. This agreement shall form the basis for all future deliveries/ services.

The contracting parties agree to comply with the principles and requirements of the Code of Conduct and to endeavor to contractually oblige their subcontractors to comply with the standards and regulations set out in this document.

This agreement comes into force upon signing. A breach of this Code of Conduct may be reason and cause for the company to terminate the business relationship, including all associated supply contracts.

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 the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labor Standards of the International Labor Organization, the United Nations Global Compact and international and national standards for information security.

3.1 Social responsibility

The supplier supports compliance with internationally recognized human rights such as BSCI (Business Social Compliance Initiative) and ILO (International Labour Organization).

a. Exclusion from forced labor

No forced labor, slave labor or comparable work may be used. All work must be voluntary and workers must be treated with dignity and respect. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment.

b. Ban on child labor

Child labor may not be used at any stage of production. Suppliers are requested to comply with the recommendation from the ILO conventions on the minimum age for the employment of children. Accordingly,

the age should not be less than the age at which compulsory education ends and in any case not less than 15 years. If children are found at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young employees must be protected and special protective regulations must be observed.

c. Prohibition of discrimination

The Supplier shall respect equal opportunities for its employees and shall oppose discrimination within the framework of the applicable regulations. In particular, any discrimination based on race, skin color, religion, age, nationality, social or ethnic origin, sexual orientation, gender, political opinion or disability must be avoided in hiring and employment.

d. Fair remuneration

The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. The remuneration for overtime must in any case exceed the remuneration for regular hours. If the remuneration is not sufficient to cover the costs of normal living expenses and to build up a minimum level of reserves, the supplier is obliged to increase the remuneration accordingly. Employees must be granted all legally prescribed benefits. Wage deductions as punitive measures are not permitted. The supplier must ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

e. Freedom of association

The right of employees to form and join organizations of their choice and to engage in collective bargaining must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for independent and free association of employees for the purpose of collective bargaining must be provided. Employee representatives must be protected from discrimination. They must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

f. Health protection, safety in the workplace

The supplier is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the activity. In addition, employees are regularly informed and trained on applicable health and safety standards and measures. Employees are given access to sufficient quantities of drinking water and access to clean sanitary facilities.

g. Complaints mechanisms

The Supplier is responsible for establishing an effective grievance mechanism at the facility level for individuals and communities that may be affected by adverse impacts.

3.2 Ecological responsibility

The supplier supports compliance with standards such as EMAS or ISO 14001. Klüh also expects the supplier to contribute to the circular economy.

a. Dealing with water as a resource

The flawless quality and availability of water in bodies of water and groundwater is the basis of life for humans, animals and plants and must not be impaired by the supplier. Water must therefore be used sparingly for all processes. In industrial plants, there should be circulation systems that enable multiple use.

b. Treatment and discharge of industrial wastewater

Wastewater from operational procedures, manufacturing processes and sanitary facilities must be typified, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

c. Dealing with air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be typified, routinely monitored, verified and treated as necessary prior to release. The supplier is also responsible for monitoring its emission control systems and is required to find cost-effective solutions to minimize any emissions.

d. Handling waste and hazardous substances

The supplier shall follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a risk if released into the environment shall be identified and handled in a manner that ensures safety during handling, transportation, storage, use, recycling or reuse and disposal.

e. Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by making savings, by recycling or by reusing materials.

f. Deforestation-free agriculture

The supplier agrees to act in accordance with the requirements of Regulation EU 2023/1115 on deforestation-free agriculture when introducing following goods into the market, making them available and exporting them: Cattle, cocoa, coffee, palm oil and some palm oil products, rubber, soy or wood (relevant raw materials according to Annex I of the regulation). This serves to preserve biodiversity and reduce greenhouse gas emissions.

g. Biodiversity

We expect our suppliers to be committed to the protection of biodiversity and to look for ways to contribute to the conservation and restoration of biodiversity.

h. Animal welfare

We expect our suppliers who process animal products to consider the welfare of animals and therefore implement standards and best practice methods for compliance with animal welfare along the entire supply chain.

Furthermore, Klüh expects suppliers to give preference to alternative animal-free methods, unless animal testing is mandatory by law. In any case, suppliers must comply with nationally and internationally applicable regulations on animal welfare and animal testing, such as the German Animal Welfare Act or Directive 2010/63 of the European Union (so-called Laboratory Animals Directive).

3.3 Ethical business conduct

The supplier supports compliance with standards such as the OECD Guidelines, the BSCI Code of Conduct or the Global Compact.

a. Fair competition

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors. These regulations also prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their own prices and other resale conditions.

b. Fight against corruption and bribery

Klüh Service Management GmbH expects its suppliers to combat all forms of corruption and white-collar crime and to implement preventive measures against them within their company. Suppliers shall ensure that their employees or subcontractors do not offer, promise or grant any benefits to employees of Klüh or related third parties in order to unfairly influence their independent business decisions.

If employees of Klüh Service Management GmbH actively demand an unfair personal advantage, we expect immediate reporting to the Compliance Department of Klüh Service Management GmbH. Procedures for monitoring and enforcing standards must be applied to ensure compliance with anti-corruption laws.

3.4 Information security and data protection

The Supplier agrees to meet the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. The Supplier shall comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transmitting and disclosing personal information. The Supplier undertakes to implement information security measures and to ensure the protection of confidential information and personal data. This includes:

Technical and organizational protection: Ensuring an appropriate level of protection through up-to-date security measures, regular system updates and physical access controls.

Access management: Assignment of access rights according to the principle of minimal rights assignment and introduction of secure authentication procedures.

Management of security incidents: Introduction of a procedure for the detection, documentation and reporting of information security incidents. The supplier undertakes to report security-relevant incidents affecting Klüh Service Management GmbH immediately and to take countermeasures.

Secure data exchange: Use of encrypted communication channels when exchanging sensitive data and information.

Data protection compliance: Compliance with all applicable data protection regulations, in particular the EU General Data Protection Regulation (GDPR), including transparency, purpose limitation and data minimization.

Review and certification: Regular audits to review IT security and proof of certification in accordance with recognized standards (e.g. ISO 27001).

Training and awareness: Regular training for employees and subcontractors on the secure handling of information and the prevention of security incidents.

The supplier agrees to submit audit reports and participate in safety audits upon request by Klüh Service Management GmbH. A breach of these guidelines may be considered a serious breach of this Code of Conduct and may result in appropriate action being taken.

4. Implementation of the requirements

Klüh Service Management GmbH expects its suppliers to comply with the Supply Chain Due Diligence Act by identifying the risks within the supply chains and taking appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier shall inform the company promptly and, if necessary, regularly about the violations and risks identified and the measures taken.

Klüh Service Management GmbH verifies compliance with the standards and regulations listed in this document by means of a questionnaire and sustainability audits at the supplier's production sites. The supplier agrees that the client may carry out such audits to verify compliance with the code at the supplier's production sites during normal business hours after reasonable advance notice by persons authorized by the client.

If a breach of the provisions of this Code of Conduct is established, the client shall notify the Supplier of this in writing within one month and set it a reasonable grace period to bring its conduct into line with these provisions. If such a breach is culpable and makes it unreasonable for the client to continue the contract until its ordinary termination, the client may terminate the contract after unsuccessful expiry of the grace period set if it has threatened to do so when setting the grace period. A statutory right to extraordinary termination without setting a grace period remains unaffected, as does the right to compensation.

5. Acknowledgement and consent of the supplier

The supplier agrees to act responsibly and to comply with the principles/ requirements listed. The supplier undertakes to communicate the content of this code to employees, agents and subcontractors in a way that is understandable to them and to take all necessary precautions for the implementation of the requirements.