

HEUBACH GROUP RESPONSIBLE SOURCING POLICY

BRIGHTER COLORS.
BRIGHTER LIFE.



HEUBACH GROUP RESPONSIBLE SOURCING POLICY

ABOUT HEUBACH

At Heubach sustainability and reliability are the values that form the basis of our business activities. We see this as a promise to our customers, employees, suppliers and stakeholders.

Together with our business partners and suppliers, we work to ensure that our standards are adhered to along the entire value chain. Our policy forms the basis for cooperation with our suppliers and explains our expectations and minimum standards.

It is an elementary component of all our purchasing activities and is brought to the attention of every supplier. Suppliers are responsible to implement these requirements through their own policies, procedures, and practices. Suppliers are also expected to follow these requirements when selecting their own suppliers and subcontractors.

By doing so, we ensure that we meet all legal requirements, and reduce the risk of supply chain disruptions, reputational harm and simply perform better.

In this Policy "Supplier(s)" means suppliers of goods and services, as well as distributors and agents that sell Heubach's products.



RESPONSIBLE SOURCING POLICY

OUR PROMISE TO OUR SUPPLIERS

All measures described in this policy are binding for us as well as for our suppliers.

We are committed to treat each other fairly, honestly and respectfully at all times. All our purchasing decisions are conducted in accordance with the highest ethical and professional standards, as set out in our Code of Conduct.

It is our goal to constantly move towards more sustainability. We want to go down this path together with our suppliers and support them.

As part of our sustainability reporting, we regularly report on progress and milestones, including sustainability in the supply chain. We will also provide feedback to our Suppliers regarding their sustainability achievements.

All suppliers are selected based on objective criteria such as quality, service, price, and sustainability performance.

Health and Safety standards that apply to our employees are also applicable to all contractors working for us.

Human Rights and Non-Harassment

The inherent dignity and personal rights of employees and contractors are respected. Workplaces are free of harassment, including mental or physical coercion, bullying, violence or any form of abuse. Suppliers should be guided by internationally recognized standards, such as the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights and the ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights at Work.

Child and Forced Labour; Modern Slavery

No individuals must be employed against their will. Any use of modern slavery, such as forced labour, indentured labour or child labour is not tolerated.

Working Conditions

The rights of all employees to appropriate remuneration, rest hours and paid leave are observed. National and local legal standards are respected. Workplaces comply with applicable legislation, especially regulations on hygiene, sanitation, access to potable water and workplace safety.

Discrimination and equal opportunity

Any form of discrimination based on gender, racial or ethnic origin, religion, belief, disability, age, sexual identity, or other differences that makes a person a unique individual is not tolerated. Employees are offered equal opportunities during the recruitment, employment, promotion, and development.

Right to Organize and Bargain Collectively

The rights of employees to establish, act on behalf of or join organizations or associations dedicated to the purpose of protecting or promoting the interests of workers are respected. These rights include the rights to collective bargaining, coalitions as well as other assemblies.

Resource Efficiency and Environmental Protection

Resources must be used efficiently. Suppliers shall promote the prevention and minimization of emissions and waste and monitor and reduce consumption of natural resources such as energy, raw materials, water, and soil. Waste must be handled, collected, stored, and disposed in a manner that is environmentally sound and in accordance with applicable law. Restrictions and prohibitions on the production or use of mercury and chemicals that are classified as persistent organic pollutants must be observed.

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RESPONSIBLE SOURCING AND SAFETY

RESPONSIBLE SOURCING

Suppliers shall seek to partner with sub-suppliers who respect human rights, comply with labour and social standards, and share the commitment to sustainability, environmental protection, and safety, and who conduct their business with integrity. Supplier shall exercise caution when selecting its suppliers and conduct risk assessments of its supply chain. In case a sub-supplier is in violation of the principles set out in this Supplier Code of Conduct, suppliers shall take adequate countermeasures.

Conflict Minerals, Mica, and Cobalt

In case that coltan, cassiterite, gold or wolframite or their derivatives are sourced, supply chain diligence and reporting procedures must be in place to prevent sourcing from conflict-affected or high-risk areas.

To address the known risks relating to the extraction of cobalt, cobalt supplied to Heubach must be acquired from suppliers who undergo audits in accordance with the Responsible Minerals Assurance Process of Cobalt (RMAP).

Supplier must not use or purchase Mica as a raw material for products supplied to Heubach without Heubach's permission.

Land and Property Rights

Land and property rights of individuals and communities are respected and not unlawfully taken away.

SAFETY

Environmental and Health Protection

All laws to protect the health of employees and consumers, and to minimize the environmental impact of Suppliers' operations must be observed.

Suppliers must work continuously to improve the environmental compatibility of their products and processes. Products must be monitored, inspected, and assessed by means of a comprehensive HSE (Health, Safety and Environment) and quality management system. Material Safety Data Sheets are made available to enable customers to safely handle and use products.

Occupational Health and Safety

HSE practices must be designed to protect the health of employees and contractors. All employees and contractors are required to comply with occupational safety regulations.

Emergency Preparedness

Potential emergency situations must be assessed. Emergency processes and safeguards must be in place to ensure comprehensive emergency management and response.



RESPONSIBLE SOURCING POLICY COMPLIANCE

COMPLIANCE

Business Ethics

No benefits of any kind, including gifts, invitations for meals or entertainment, may be accepted or offered in the course of interactions with public officials or business partners, which may be seen as intending to influence business decisions to one's own advantage.

Fair Competition

Anti-trust and other competition laws are observed.

Business Records and Fraud

All transactions are documented accurately, and financial books and records are properly maintained in accordance with applicable law and generally accepted accounting practices.

Any type of records, for example testing results or environmental records, must not be falsified. Likewise, misrepresentations, deceptive actions or omissions are not acceptable.

Embargoes and Trade Control

Applicable trade control regulations, embargoes and other restrictions are observed.

Money Laundering

Supplier shall abstain from money laundering activities and set appropriate preventive actions.

Conflicts of Interest

Suppliers shall disclose to Heubach any situation that may appear as a conflict of interest, such as a Heubach employee having professional, private and / or financial advantages or interests in any of the supplier's businesses.

Data Protection

Personal Data is protected and processed in accordance with applicable Data Protection Legislation.

Confidentiality, Information Security, and Intellectual Property

Intellectual Property Rights of Heubach or third parties are respected. Confidential information provided by Heubach is protected.

COMMUNICATION AND REPORTING

Suppliers are encouraged to speak to a Heubach representative about any challenges they may face in meeting the requirements of the Supplier Code of Conduct.

Suppliers must report any failure to meet a requirement. Timely communication with Heubach will allow the affected parties to work on preventive or remedial measures.

Anyone, including Suppliers' employees and contractors, who becomes aware of violations of the Supplier Code of Conduct can report such violations through either Heubach's Digital Whistleblower System that can be accessed through Heubach's Website <https://www.heubach.com/about/compliance/> or by writing to group.compliance@heubach.com

Reports can be made anonymously through the Digital Whistleblower System. Any form of retaliation against a whistleblower who reports a violation or potential violation of the Supplier Code of Conduct in good faith will not be tolerated.

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