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Supplier Code of Conduct of Schachinger Group

The Schachinger Group is committed to business integrity in accordance with the relevant laws. In our Code of Conduct and our Anti-Corruption Guidelines for the employees¹ of Schachinger Group, we set clear minimum ethical standards that form the basis of our behaviour. The topics contained therein cover the entire spectrum of our daily work. The rules and guidelines derived from this provide the necessary security and orientation in everyday work. However, the Code of Conduct also has an effect on the outside world. It demonstrates to our customers that Schachinger Group is a trustworthy partner. It is firmly anchored in our corporate culture. We also expect our suppliers (and sub-suppliers) to comply with the same minimum ethical standards. The Supplier Code of Conduct of Schachinger Group also defines the principles and requirements of Schachinger Group for its suppliers of goods and services with regard to their responsibility for people and the environment. Schachinger Group reserves the right to change the requirements of this Code of Conduct. In this case, Schachinger Group expects its suppliers (and sub-suppliers) to accept such reasonable changes.

The supplier hereby declares:

I. Compliance with laws and ethics

To comply with the laws of the applicable legal system(s) and to be guided by the principles of the
"Global Compact" of the United Nations and the "ETI Base Code" and the principles of the 1998
Declaration of the International Labour Organization (ILO) on Fundamental Principles and Rights at
Work in accordance with national law and practice.

II. Prohibition of corruption, bribery and money laundering

- To comply with all applicable national and international anti-corruption laws, regulations, rules and standards.
- Not to tolerate or engage in any form of corruption or bribery, including any unlawful offer of payment or similar benefit to government officials to influence decision-making.
- To comply with all applicable anti-money laundering laws and regulations.

III. Fair competition

• To comply with all applicable competition and antitrust laws.

IV. Respecting the basic rights of employees and ensuring fair working conditions

- To promote equal opportunities and equal treatment of employees regardless of their skin colour, race, nationality, social background, any disability, sexual orientation, political or religious beliefs, gender or age.
- To respect the personal dignity, privacy and personal rights of each individual.

¹ The masculine form is used for better readability even though both genders are always referred to.



- Not to employ or force anyone to work against their will. Employees must always keep control of their identification documents.
- To ensure that employees do not have to pay fees or other payments in order to be employed.
- To be responsible for all payments related to legally binding fees and expenses that may be incurred in connection with employees,
- Not to tolerate unacceptable treatment of workers, such as mental or physical duress, sexual and personal harassment or discrimination.
- Not to tolerate behaviour (including gestures, language and physical contact) of a sexual, coercive, threatening, abusive or exploitative nature.
- To ensure fair remuneration and to guarantee and contractually stipulate national laws and industry standards on working hours, overtime, wages, salaries and other employer benefits.
- To recognize, to the extent permitted by law, the freedom of association of employees and to neither favour nor discriminate against members of employee organizations or trade unions.

V. Prohibition of child labour

Not to hire children under the minimum legal age of employment in the relevant country or jurisdiction.

VI. Health and safety of employees

- To assume responsibility for the health and safety of its employees in accordance with legal requirements.
- To contain risks and ensure the best possible precautionary measures against accidents and occupational diseases.
- To provide training and ensure that all employees are knowledgeable about occupational safety.
- To set up and apply an appropriate occupational safety management system.

VII. Environmental protection

- To observe environmental protection with regard to legal norms and international standards.
- To minimise environmental pollution and continuously improve environmental protection.

VIII. Responsible sourcing of raw materials

- only use raw materials in its supply chains whose extraction, production, transportation, trade, processing and export do not directly or indirectly contribute to human rights violations, health and safety problems, environmental pollution or compliance violations.
- comply with generally recognized standards and laws on land, forest and water rights and the prohibition of unlawful eviction or land confiscation.
- comply with the OECD Due Diligence Guidance for Responsible Supply Chains.
- implement special due diligence processes and activities to identify, prevent, minimize or eliminate these risks where critical raw materials or process materials are used to manufacture its goods.
- procure raw materials from verified and certified sources.
- Identify risks related to human rights and, where necessary, take measures to mitigate them. The necessary evidence must be provided by the supplier on request.

IX. Animal welfare

- Compliance with animal welfare in the context of business activities and along the entire supply chain.
- The renunciation of animal testing, unless this is required by law.
- Compliance with national and international regulations on animal welfare and animal testing, such as the Austrian Animal Welfare Act (TSchG) or Directive 2010/63 of the European Union (so-called Laboratory Animals Directive).



X. Privacy and confidentiality

- To comply with all privacy and security laws and regulations.
- To adequately protect and not disclose information that is not available to the public.

XI. Supply chain

- To adequately promote compliance with the contents of the Code of Conduct among suppliers.
- Establish a due diligence process with appropriate measures to ensure that suppliers and subcontractors also comply with the standards and rules set out in this document.
- To comply with the principles of non-discrimination when selecting and dealing with suppliers.

XII. Right to audit and consequences of violations

- To take immediate and appropriate remedial action should the supplier become aware that requirements of this Supplier Code of Conduct have been violated in its own business or in its supply chain.
- To inform the SCHACHINGER Group immediately in the event of confirmed violations of the obligations arising from this standard in its own business area or in its supply chain.
- To authorise Schachinger Group to check compliance with the requirements of this Code of Conduct subject to reasonable prior notice in the event of a reasonable suspicion of a violation of this Code of Conduct.
- That any breach of the obligations imposed by this Code of Conduct constitutes a material breach of contract.

XIII. Whistleblower protection

- Implement the provisions of the Whistleblower Protection Act (HSchG).
- set up internal reporting channels so that whistleblowers can report confidentially and are protected.

XIV. Reporting Violations

Email: compliance@schachinger.com

(Mag. Johannes Wöckinger)

(Dr. Ehrenfried Werderits)



Supplier Declaration

We have received the Supplier Code of Conduct and are committed to complying with its provisions. The Code of Conduct and this declaration represent an additional agreement to our existing business relationship or each individual contract with the SCHACHINGER Group. We will encourage our suppliers and subcontractors to comply with the provisions. In the event of a violation of the provisions of this Supplier Code of Conduct, we will inform the SCHACHINGER Group.

The SCHACHINGER Group is entitled to ensure compliance with the provisions of the Code of Conduct. This can take the form of an on-site inspection agreed with us or by submitting a questionnaire or similar instrument. If there is a suspicion of a violation of the Code of Conduct (e.g. in media reports), we will send the SCHACHINGER Group a written statement immediately upon request. In the event of a grossly negligent or intentional breach of duty under the Code of Conduct or this declaration, the SCHACHINGER Group reserves the right to exercise its right of termination for good cause and to terminate existing contracts and orders, provided that the breach of duty is not rectified within a reasonable period of time.

Place / company signature