

**HOYER GROUP**

# Supplier's Code of Conduct

For us as Hoyer GmbH Internationale Fachspedition and our affiliated companies (collectively "HOYER Group"), sustainability and corporate responsibility are an essential part of our mission statement and are inseparably linked to our business strategy.

We are an international logistics company, and we provide services and solutions worldwide in the bulk logistics area. The work for our customers includes transporting and handling chemical and petrochemical products, foodstuffs and gases.



We are aware of our responsibility towards our employees, business partners, customers and all other company

stakeholders, as well as to the general public and the environment. We take this responsibility seriously. Against this background, we aspire to ensure that the principles of sustainable development and entrepreneurial responsibility also apply

in our supply chain. We want to work only with suppliers who recognise, support and adhere to the principles set out below, in particular the internationally recognised standards of environmental, social and corporate governance (ESG). This Supplier Code of Conduct is based on the ten principles of the United Nations Global Compact Initiative, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. It specifies our requirements applicable to our suppliers.

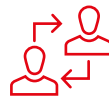
Moreover, we expect our suppliers to agree on these standards with their direct suppliers and contractors accordingly, and to use their best endeavours to enforce compliance with these standards throughout their entire supply chain.



## A. BUSINESS INTEGRITY

1. You will comply with all applicable laws, rules, regulations (including, but not limited to, the rules of antitrust law, export control law including sanctions regimes, and supply chain laws) and, in addition, all generally accepted standards regarding your operations, your products and your services.
2. To ensure compliance with the aforementioned laws, rules, regulations and standards, as well as our standards regulated in this Supplier Code of Conduct, you will have an appropriate compliance management system in place.
3. You confirm to us that neither you as our supplier, nor your financial institutions, nor any company affiliated with you, nor any other legal or natural person who owns or controls your company, is/are included in any sanctions list. Sanctions lists within the meaning of Sentence 1 are the sanctions lists of i) the United Nations Security Council (UN) and the European Union (EU), ii) the sanctions lists of other governments, insofar as these do not unilaterally exceed UN or EU sanctions, and iii) sanctions lists of other governments that unilaterally exceed UN or EU sanctions, insofar as the sanctions list includes not only natural or legal persons, entities or bodies from one country.
4. You actively act against any kind of corruption, bribery, theft, embezzlement, fraud or extortion. You prohibit any illegal payments or the granting of other benefits/gifts to individuals, companies or public officials whose aim is to influence decision-making processes. Invitations or gifts will not be misused by you to influence employees of the HOYER Group or persons close to them, or business contacts or public officials, and will be given only under reasonable circumstances (locally generally accepted business practice) and to a reasonable extent (low value). Likewise, you do not demand any undue advantages from HOYER Group employees.

5. You comply with all applicable legal obligations to prevent money laundering and terrorism financing, and you do not directly or indirectly engage in money laundering or terrorism financing activities.
6. You ensure that all business decisions are made on the basis of objective criteria, and that potential conflicts of interest are already avoided at the very outset.
7. You will comply with all applicable data protection laws, and attach particular importance to the protection of personal data. Your information systems containing confidential information or data of the HOYER Group are appropriately managed and secured by appropriate technical protection against unauthorised access.



## B. HUMAN RIGHTS AND WORKER'S RIGHTS

1. You comply with the ILO core labour standards, and accordingly you prohibit and refrain from any form of child labour in your company.
2. You do not allow or participate in any form of forced or compulsory labour (this also includes modern slavery and servitude) or human trafficking in your companies. All work is performed voluntarily. Your employees are free to leave you in compliance with the statutory notice periods.
3. You create a working environment that is free throughout from any kind of discrimination (in particular but not exclusively based on characteristics such as skin colour, sex/gender, nationality, religion, political or other beliefs, ethnic origin, disability, age, sexual orientation and identity) and unlawful practices, and which respects the right to freedom to express opinion, and respects the protection of the personal rights and privacy of your employees. You pay equivalent wages for equivalent services.

4. You prevent any inappropriate or inhumane treatment of employees, e.g. psychological hardship or sexual harassment.
5. You take care to ensure a safe, healthy working environment in accordance with applicable legal and international standards regarding health and safety at the workplace. In particular, you ensure that there is adequate lighting, temperature and ventilation at the workplace at all times, and that free access to sanitary facilities and sufficient drinking water is provided. You protect your employees from hazards, including biological, chemical, electrical and physical hazards and hazards emanating from radiation (e.g. X-rays, radar or microwaves), and you conduct regular training courses which ensure that all employees are appropriately trained.
6. You comply with the respectively applicable national legislation on working time. If no national legislation exists, you shall also comply with the International Standards of the ILO in this respect.
7. You respect, in accordance with local legislation, the rights of employees to form an employee representation scheme and to carry out collective bargaining.
8. You ensure the payment of a living wage in accordance with local living conditions and, especially in the case of cross-border staff deployment, you comply with all applicable pay and remuneration laws (particularly regarding payment of a minimum wage).
9. You provide your employees and other individuals and interest groups with the opportunity to report concerns, potentially unlawful workplace practices or breaches of the obligations set out in this Supplier Code of Conduct, through a regulated anonymous complaints procedure.



### C. ENVIRONMENT

1. You comply with all applicable environmental, energy, health and safety regulations.
2. You have established and you apply an appropriate environmental and energy management system.

3. In developing and manufacturing your products, and also in their transport, use and disposal, you attach particular importance to safety and environmental compatibility, and you ensure that all applicable requirements regarding product quality and product safety are fulfilled.
4. You ensure that the general public is protected from dangers and hazards that can emanate from your manufacturing processes and products.
5. You handle natural resources such as energy, water and raw materials efficiently, responsibly and sparingly. You employ energy-efficient, environmentally-friendly technologies to reduce your amounts of waste and your emissions to air, water and soil.
6. You create transparency regarding your own emissions as well as those from upstream activities, and you work on continuous improvements. You continue to promote the use of renewable energies and alternative, environmentally-friendly energy sources.



### D. CONFLICT MINERALS

1. You comply with your due diligence obligations for minerals supply chains in accordance with the recommendations in Annex II of the OECD Due Diligence Guidelines to Promote Responsible Supply Chains for Minerals from Conflict and High-Risk Areas (OECD DDG), and you observe all applicable statutory regulations regarding conflict minerals. In particular, you do not supply products containing conflict minerals that directly or indirectly finance or support armed groups and cause human rights violations.
2. The HOYER Group expects that minerals, in particular tin, tantalum, tungsten, gold and their corresponding ores and metals, were acquired free of conflict.



## E. IMPLEMENTATION

1. For the HOYER Group, your acceptance of this Supplier Code of Conduct is a precondition for a business relationship.
2. The Supplier Code of Conduct is a part of all contractual agreements with suppliers of the HOYER Group.
3. The HOYER Group expects you to provide adequate resources to ensure the implementation and ongoing compliance with this Supplier Code of Conduct.
4. For all business areas, you have established a risk management system with which you identify and manage the risks in all areas addressed under A. to D. above. Your risk management ensures that human rights and environment-related risks in particular are identified and minimised, and that violations of human rights-related or environment-related obligations are prevented or stopped, and their extent minimised.
5. You have issued a declaration of basic principles concerning your human rights strategy.
6. You have defined specific responsibilities within the company for all areas addressed under A. to D. above, and you regularly (at least annually and also on an ad hoc basis) carry out risk analyses and self-evaluations to ensure conformity.
7. With your immediate suppliers, you also agree on appropriate measures to comply with this Supplier Code of Conduct. In particular, but not exclusively, you take into account human rights-related and environment-related expectations when selecting a direct supplier, and you obtain contractual assurance from a direct supplier regarding compliance with this Supplier Code of Conduct along the supply chain, and you agree on appropriate contractual inspection mechanisms to verify their compliance.
8. If you become aware that a violation of a human rights-related or environment-related obligation has already occurred or is imminent in your own business area or at one of your direct suppliers, you take immediate and appropriate remedial action to prevent or stop this violation or to minimise the extent of the violation. If the violation of a human rights-related or an environment-related obligation at one of your direct suppliers is of such a nature that you cannot stop it in the foreseeable future, you shall immediately draw up and implement without delay a concept with a concrete timetable to end or minimise it.
9. If you have specific indications that make a violation of a human rights-related or environment-related obligation by indirect suppliers appear possible, you shall without delay carry out a risk analysis, enforce preventive measures against the perpetrator (e.g. carrying out inspection measures), create and implement a concept to prevent, terminate or minimise the violation, and if necessary update your declaration of basic principles.

The HOYER Group reserves the right to verify compliance with this Supplier's Code of Conduct through internal and external audits or assessments. Any violation of the basic principles and requirements of this Supplier's Code of Conduct will be regarded as a material breach of contract by the supplier. In the event of a violation, the HOYER Group will take suitable, appropriate measures depending on the severity of the violation and on available remedial options. In particular, the HOYER Group reserves the right to extraordinary termination without notice of individual or all contractual relationships, and the asserting of compensation claims if you do not comply with this Supplier's Code of Conduct.

In order to counteract violations at an early stage, there is an option to submit notifications. If there are any indications of potential misconduct, we expect you to report them via the HOYER Compliance Hotline. You can access the HOYER Compliance Hotline at [www.hoyer-group.com/en](http://www.hoyer-group.com/en).