



Code of conduct for suppliers
(hereinafter referred to as "CoC")

CONTENT

Preface

Scope

- 1. Corporate responsibility**
- 2. Environmental and climate protection**
- 3. Transparent business relations**
- 4. Market behavior**
- 5. Protection of data, business secrets, and corporate assets**
- 6. Legal consequences in case of violations of the CoC**

PREFACE

WITRON is a German corporate group headquartered in the Upper Palatinate which is active in the field of planning, realizing, and operating logistics systems and material flow systems worldwide, particularly in the food / near-food / non-food retail sector. In many cases, these logistics systems form a core element in the supply of WITRON customers' store chains with convenience goods. They are therefore partly systemically relevant for supplying the population of the respective areas and regions. In order to account for this, WITRON provides sustainable support on site for its customers' distribution centers by means of customized service concepts.

WITRON is committed to its corporate responsibility towards customers, business partners, employees, and the public. For WITRON, this means aligning its activities with ethical principles while paying particular attention to existing legal requirements, environmental protection, and the most careful and sustainable use of natural resources.

AREA OF APPLICATION

WITRON pursues a strategy of ethical and sustainable economic management along its supply chain and expects the same from its suppliers. This also includes a commitment by the supplier to the basic principles listed in this CoC. If the suppliers use any third parties (e.g., subcontractors) to fulfill their obligations to WITRON, these third parties must also be bound by the basic principles defined in this CoC.

WITRON reserves the right to check compliance with the requirements mentioned in this CoC on site at its suppliers' or business partners' premises during regular business hours and in accordance with the applicable (data protection) regulations and specifications in individual cases. Suppliers must ensure that WITRON has corresponding rights with the third parties they commission.



1. CORPORATE RESPONSIBILITY

WITRON's corporate responsibility obliges it to comply with the statutory provisions. WITRON expects the same from its suppliers as well as compliance with the following basic principles:

1.1. Human rights

WITRON's suppliers respect and comply with the globally applicable regulations and specifications for the protection of human rights as fundamental and universal specifications. In particular, this includes ensuring that WITRON's suppliers do not use or tolerate forced labor or child labor. Suppliers shall comply with the regulations on the statutory minimum wage for the employment of children defined in ILO Conventions 138 and 182.

1.2. Equal opportunities and non-discrimination

WITRON's suppliers do not discriminate against anyone on the basis of ethnic, national, or social origin, skin color, gender, religion, ideology, age, disability, sexual orientation, political views, insofar as these are based on democratic principles and tolerance towards those with different opinions, or other legally protected characteristics, insofar as this does not conflict with compelling law.

1.3. Freedom of association

The fundamental right of all employees to form and join employee representative bodies is recognized. Where this right is restricted by local laws, alternative, legally compliant options for employee representation bodies should be promoted.

1.4. Product safety

WITRON's suppliers observe and comply with all applicable product safety regulations and specifications. These include, in particular, the legal regulations regarding the safety, labeling, and packaging of products as well as the use of hazardous substances and materials.

1.5. Workplace safety and working hours

WITRON's suppliers observe and comply with the applicable regulations and specifications for health and safety at work. They promote the continuous development and improvement of working conditions in their companies. Suppliers shall regulate working hours in their companies in accordance with the respective national regulations and specifications or the minimum standards of the respective national economic sectors.

1.6. Minimum wage

WITRON's suppliers shall provide their employees with appropriate remuneration in compliance with existing regulations and specifications regarding minimum wage.



2. ENVIRONMENTAL AND CLIMATE PROTECTION

WITRON wants to make a significant contribution to environmental and climate protection. To this end, WITRON expects its suppliers to observe the following basic principles in particular:

2.1. Compliance with legal requirements

WITRON's suppliers assume responsibility with regard to environmental protection and comply with existing regulations and specifications, particularly those relating to the environment and sustainability.

2.2. Increasing energy and resource efficiency

WITRON's suppliers use natural resources economically and minimize the environmental impact of their production processes and products. They help to reduce energy consumption and CO2 emissions.

2.3. Creation and application of environmental management systems

WITRON's suppliers are continuously improving their environmental performance. For this purpose, they maintain suitable environmental management systems at their production sites (e.g., in accordance with ISO 14001 or the European Union's EMAS Regulation).

3. TRANSPARENT BUSINESS RELATIONS

Openness and transparency are essential prerequisites for credibility and trust in commercial transactions. Against this background, WITRON expects its suppliers to observe the following basic principles in particular:

3.1. Avoidance of conflicts of interest

WITRON's suppliers make their business decisions exclusively on the basis of factual criteria and are not influenced by personal interests and relationships.

3.2. Prohibition of corruption

WITRON's suppliers do not tolerate corruption. They ensure that their employees, subcontractors, or agents do not demand, offer, or grant any personal, business, or other benefits to which they are not entitled. In particular, they do not demand, offer, or grant bribes, payoffs, improper donations, or comparable improper payments or benefits to customers, officials, or other third parties.



3.3. Special benefits

WITRON rejects any form of bribery. WITRON does not require any special benefits (e.g., money, gifts, invitations to sporting or cultural events, or similar) to achieve business success. Any benefits the acceptance of which requires concealment by the recipient or exposes the recipient to a moral obligation are prohibited. This also applies to our suppliers accordingly.

3.4. Public contracts / dealing with government agencies

When dealing with governments, authorities, and public institutions, WITRON's suppliers observe the relevant existing regulations and specifications. They follow the relevant procedures and rules of open competition when participating in public invitations to tender.

3.5. Consultants and intermediaries

WITRON's suppliers only work with consultants and intermediaries in accordance with existing regulations and specifications. They only remunerate consultants and intermediaries for services actually rendered, whereby the remuneration must be proportionate to this.

4. MARKET BEHAVIOR

As a serious market participant, WITRON stands by its contractual obligations and expects the same from its suppliers. To this end, WITRON also expects its suppliers to comply with the following basic principles:

4.1. Market economy and open competition

WITRON is committed to the social market economy and open competition and expects a corresponding commitment from its suppliers. WITRON's suppliers observe the applicable regulations and specifications for the protection of open competition. They do not enter into agreements with competitors, suppliers, customers, or third parties that violate competition or antitrust law, nor do they abuse a market-dominating position.

4.2. Export control

WITRON's suppliers shall observe and comply with the existing regulations and specifications for the import and export of goods, services, and information.

4.3. Reputable business relationships / money laundering

WITRON's suppliers only maintain business relationships with partners of whose reliability they are convinced. Suppliers and their business partners comply with the respective applicable regulations and specifications against money laundering.



4.4. Publication of business information

WITRON's suppliers publish business data and report on their business activities truthfully and in accordance with the respective applicable regulations and specifications.

5. PROTECTION OF DATA, BUSINESS SECRETS, AND CORPORATE ASSETS

Confidential data, business secrets, and company assets are crucial for the existence and development of any company. Protecting them is therefore a high priority. In particular, WITRON expects its suppliers to comply with the following basic principles:

5.1. Data protection

WITRON's suppliers shall comply with all respective applicable regulations and specifications for the protection of personal data of employees, customers, suppliers and other data subjects.

5.2. Protection of know-how, patents, trade secrets, and business secrets

WITRON's suppliers shall observe and respect the know-how, industrial property rights (e.g., trademarks, patents, registered designs and utility models, copyrights) including their applications, trade secrets, and business secrets of WITRON and third parties. They shall take appropriate measures to ensure that such information and rights are neither violated nor used in an unauthorized manner by themselves or by third parties commissioned by them.

5.3. Handling corporate assets

WITRON's suppliers shall observe and respect WITRON's tangible and intangible assets (e.g., buildings, land, machinery, industrial property rights). You do not use it for unfair or external purposes. Furthermore, you shall ensure that your employees and any third parties (such as subcontractors or agents) deployed by you neither damage WITRON's assets nor use them improperly or contrary to WITRON's interests.

5.4. Security of the international supply chain

WITRON's suppliers shall ensure that the operating sites and handling locations where the goods intended for WITRON are produced, stored, handled or processed, loaded, and transported are protected against unauthorized access by third parties as part of a secure supply chain and that the personnel deployed are reliable and qualified.



6. LEGAL CONSEQUENCES IN CASE OF VIOLATIONS OF THE CoC

In the event of breaches of this CoC by the supplier or third parties deployed by the supplier, WITRON shall be entitled but not obliged, at its own reasonable discretion, to terminate the business relationship with the supplier either by giving notice or without notice. WITRON is also entitled to take any other measures it deems appropriate; WITRON may make use of this right in particular if the supplier can credibly assure or prove that he/she has immediately remedied or rectified the breach of this CoC and the resulting consequences and has simultaneously introduced countermeasures to prevent future breaches.

Version: 1.0

Valid from: 2024-01-01

Contact: WITRON Logistik + Informatik GmbH,

Human Rights Officer,

Neustädter Str. 21,

92711 Parkstein

menschenrechte@witron.de