

# Code of Conduct / supplier policy

# 1. Preamble

pbz is a general contractor, management and engineering service provider for infrastructure projects operating throughout Germany. As such, pbz is fully committed to the ten principles of the United Nations Global Compact. Our principles include environmental, social and ethical standards that are integrated into our corporate culture. We stand for sustainable corporate governance and continuous improvement and expect the same from our suppliers and employees. After all, our suppliers and employees not only contribute to the company's economic success, but also have a significant impact on pbz's reputation among all our stakeholders.

Our Code of Conduct is based on national and international laws and conventions, including the Supply Chain Due Diligence Act (LkSG), the UN Civil Covenant, the UN Social Covenant, the Guidelines on Children's Rights and Business Conduct, the United Nations Guidelines on Business and Human Rights, the International Labour Organization's International Labour Standards and the United Nations Global Compact.

This code of conduct applies to our cooperation, which must be adhered to by both sides. The Supplier undertakes to also present this Code to its subcontractors and to ensure that they comply with the Standards. Violation of the Code may result in the termination of the business relationship.

# 2. Scope

The Code of Conduct applies to all suppliers and subcontractors (including their bodies, employees, representatives and subcontractors) of pbz, as well as to contractual partners of our stakeholders, insofar as we manage and coordinate them on their behalf. Suppliers and night contractors are obliged to implement this Code carefully and to present its content to their employees and subcontractors. They are also expected to abide by this code.

# 3. Requirements for suppliers

# **Business Compliance**

pbz considers compliance with all national and applicable international laws by its suppliers and subcontractors to be a matter of course. If there are differences between the provisions of this Code of Conduct and national/international laws, suppliers and subcontractors are required to comply with the stricter rules. In the event of any conflict between the provisions of this Code and national/international laws, these will be evaluated in cooperation with the suppliers and the most appropriate course of action will be determined. If conflicts are detected, the supplier must inform pbz immediately.

# Social Responsibility

# Exclusion of Forced Labour

Forced and slave labor are strictly forbidden. Work must be voluntary, without threats or punishments. Employees can resign at any time. Unacceptable treatments such as psychological stress, sexual harassment and humiliation are prohibited. The use of security forces is prohibited if it results in inhumane treatment or interferes with freedom of association.

# Prohibition of child labour

Child labour is not allowed at any time. Suppliers must adhere to ILO recommendations on the minimum age for employment, which should not be less than the age at which compulsory education ends, and in any case should not be less than 15 years. If children are discovered at work, the supplier must document what measures are being taken to help them and enable them to attend school. Persons under the age of 18 may not be employed in work that endangers their health, safety or morals. Special protective measures must be observed.

## Fair remuneration

Pay for work and overtime must be in line with either the statutory minimum wage or industry standards, whichever is higher. Overtime must be better paid than regular hours. The supplier must increase the fee if it is not sufficient to cover the cost of living and build up reserves. All statutory benefits must be provided to employees, with no wage deductions as a penalty. Employees must be provided with clear written information about their pay.

## Fair working hours

Working hours must comply with applicable laws or industry standards. Overtime is only allowed if it is voluntary and does not exceed 12 hours per week, while employees must be given at least one day off after six consecutive working days. The weekly working time may not exceed 48 hours on a regular basis.

# Freedom of association

Workers have the right to form organisations, to join, to negotiate and to strike. If these rights are restricted by law, alternative avenues for independent negotiations must be allowed. Discrimination on the basis of trade union activities is prohibited. Workers' representatives should have access to workplaces to exercise their rights in a peaceful manner.

#### Discrimination

The unequal treatment of employees in any form is inadmissible unless it is based on the requirements of employment. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin colour, disability, health status, political opinion, belief, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

# occupational health and safety; Safety in the workplace

The supplier must ensure a safe and healthy working environment. This includes appropriate occupational safety systems and precautionary measures against accidents and damage to health. Excessive stress is avoided and employees are regularly informed and trained on health and safety standards. Access to drinking water and clean sanitation is ensured.

The Service Provider certifies continuous compliance with all legal and regulatory requirements. In detail, it is stipulated that all employees employed ensure the following points before and during the execution of the order:

- That the personal protective equipment is available and ready for use.
- That in the last 12 months an occupational safety briefing has been demonstrably carried out by his employer.

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- That the necessary health examinations are carried out.
- That necessary protective measures (e.g. fall protection) are fully adhered to and that the appropriate devices / equipment are carried along.
- That the work and aids carried are subject to regular monitoring
- That the safety-relevant instructions of the managers are followed.
- That defined and posted operating instructions are taken into account.
- That dangerous work (e.g. hot work) is only carried out with the individual permission of the company management / management.
- That the requirements of the safety data sheets are fully complied with when hazardous substances are used.
- That the vehicle is only operated at walking pace on the company premises and in the production halls only with an instructor.
- That the use of the operating equipment (e.g. crane) only takes place after prior consent, if necessary instruction.

#### Preservation of natural resources

The supplier must not interfere with the legitimate rights to land, forests or bodies of water that are important to people's livelihoods. It must avoid harmful environmental impacts such as soil, water and air pollution, as well as noise and excessive water consumption, in order to protect people's health and ensure access to vital resources such as drinking water and sanitation.

## Dealing with conflict minerals

In the case of the use of the conflict minerals tin, tungsten, tantalum and gold, as well as other raw materials such as cobalt, the Company establishes processes in accordance with the OECD Due Diligence Guidelines for the Promotion of Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas and expects its supplier to do the same. Smelters and refineries without adequate, audited due diligence processes should be avoided.

# **Ecological Responsibility**

## Treatment and discharge of industrial wastewater

Wastewater from operations, manufacturing processes and sanitation must be analyzed, monitored and, if necessary, treated before discharge or disposal. Measures should also be taken to minimise wastewater generation.

## Dealing with air emissions

General emissions from operations, including air and noise emissions, as well as greenhouse gas emissions, must be analysed, regularly monitored and treated as needed before release. The supplier must monitor its exhaust gas cleaning systems and find economical solutions to minimize emissions.

## Handling of waste and hazardous materials

The supplier applies a systematic method to identify, manage, reduce, and dispose of or recycle solid waste in an environmentally sound manner. It complies with the 1989 Basel Convention on the Export of Hazardous Wastes. Chemicals or materials that may pose environmental hazards are detected and handled safely, whether during storage, transport, use, recycling or disposal, to ensure safety. Mercury is used under the 2013 Minamata Agreement and persistent organic pollutants under the 2001 Stockholm Convention.

## Reduce the consumption of raw materials and natural resources

It is important to minimize or avoid resource consumption and waste production during production, including water and energy. This can be achieved through various measures, such as optimizing production and maintenance processes, using alternative materials, savings, recycling, repairing, reusing materials, designating repair companies.

## Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Economical solutions must be found to improve energy efficiency and minimize energy consumption. Logistics, especially delivery routes, must be planned and implemented in a way that conserves resources as much as possible.

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#### Coverage

In the case of product deliveries, we expect our suppliers to provide information on logistics routes and the forwarding companies that deliver them for each product in the event of suspicion of non-compliance with our energy efficiency requirements (unless delivered by the supplier itself)

#### Circular economy

In order to handle products responsibly, a procedure for the free return of packaging and the free return of equipment should be offered, as far as possible, as well as discounts for returned goods. All returned goods should be recycled responsibly, and repairability and circularity should be taken into account as early as the development of products. If possible, repair support of at least 10 years should be guaranteed.

## **Ethical Business Conduct**

## Fair competition

It is important to adhere to the rules of fair business activities, fair advertising and fair competition. This includes the application of applicable antitrust laws, which prohibit collusion with competitors that affect prices or conditions. Collusion between customers and suppliers that restricts resale pricing is also prohibited.

## Confidentiality/Data Protection

The Supplier undertakes to adequately protect the privacy of its clients, suppliers, customers, consumers and employees. They must comply with data protection laws and regulations and ensure that personal information is properly collected, stored, processed, transmitted, and shared.

#### Intellectual property

Intellectual property rights must be respected; Technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected.

# Integrity/Bribery, Taking Advantage

The highest standards of integrity must be applied to all business activities. The supplier must have a zerotolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing the standards must be applied to ensure compliance with anti-corruption laws. Exceptions apply to small gifts such as pens or calendars, as long as no undue influence is suspected.

## Donations and Sponsorship

Donations and sponsorship must not be used to circumvent corruption rules. They must not be given as a medium of exchange for illegitimate advantages and must always comply with the law. Business partners are not allowed to make donations or contributions on behalf of the company or employees.

## Partner Networks

Not only in our company, but also in our partner networks, we strive for an inclusive and diverse environment and encourage our suppliers to support diverse business activities and opportunities in their partner networks. For small and micro suppliers, fair payment terms must be guaranteed in accordance with the German Civil Code (BGB).

#### Consultants and intermediaries

When commissioning consultants and intermediaries, particular care must be taken to ensure that these business relationships are not misused to grant undue advantages to third parties, in particular public officials.

#### Money laundering and terrorist financing

pbz only works with suppliers and subcontractors whose business activities are within the scope of the legal requirements and whose financial resources are of legitimate origin. We also expect our suppliers and subcontractors not to work with business partners who directly or indirectly support money laundering or terrorist financing.

## Conflicts

All suppliers and subcontractors as well as their employees are requested to avoid situations in which their personal, family, political or financial interests could have a negative impact on business relations with pbz.

# 4. Implementation of the requirements

With respect to supply chains, we expect our suppliers to identify risks within them and to take appropriate countermeasures. In the event of suspected violations and in order to secure supply chains with increased risks, the supplier will inform us promptly and, if necessary, regularly about the identified violations and risks as well as the measures taken.

In case of suspicion, we check compliance with the standards and regulations listed here with audits at suppliers' production sites. The Supplier agrees that we may carry out such audits at our expense, for specific reasons, at the premises during normal business hours after reasonable advance notice by persons commissioned by us. The supplier may object to individual audit measures if they would violate mandatory data protection regulations.

# Appeal proceedings

The supplier must share our contact information and complaints procedure with its employees in order to allow complaints to be made confidentially and without discrimination. If no notice is given, the supplier itself must set up an effective complaints system. In the event of violations, we will notify the supplier in writing and set a reasonable deadline for correction. If no solution is found, we may temporarily suspend the business relationship and, in the event of serious violations, terminate it immediately with the right to compensation

# 5. Acknowledgement and consent of the supplier

By signing this document, the supplier undertakes to act responsibly and to adhere to the principles/requirements listed. The Supplier undertakes to communicate the content of this Code to the employees, agents and subcontractors in a manner that is understandable to them and to take all necessary precautions for the implementation of the requirements.

Name:

Address:

Trade / Service:

Annual order for recurring work: YES NO  $\hfill\square$ 

Single Order: YES NO

Date, signature, company stamp of the service provider

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