



## **Supplier code of conduct**

(Supplier code of conduct)

for the following companies of the Vollmann Group:

Otto Vollmann GmbH & Co. KG  
Vollmann (Sachsen) GmbH & Co. KG  
N.I.E.R. Stanz- und Umformtechnik GmbH & Co. KG  
SYNTEKS Umformtechnik GmbH  
AZ Ausrüstung und Zubehör GmbH & Co. KG  
Vollmann Presstechnik GmbH & Co. KG  
Vollmann Lege s.r.o.  
Vollmann MetalWorx s.r.o.  
Vollmann Stamping Kft.

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## 1. Foreword

The business partner code of conduct specifies the sustainability requirements of the Vollmann Group for all suppliers and service providers along the supply chain. These requirements are based on the national and international laws, ordinances, conventions and standards as well as the guidelines of the Drive Sustainability Initiative for improving sustainability.

Specifically, this means having a clear commitment to at least the following points:

- Working conditions and human rights
- Health and safety
- Business ethics
- Environment and climate protection
- Responsible procurement of raw materials
- Information security and data protection

## 2. Working conditions and human rights

Vollmann Group expects its suppliers to apply human rights due diligence to identify, prevent, mitigate and address human rights abuses in their own operations as well as in their supply chains.

### 2.1. On the issue of child labour and under-age workers

The Vollmann Group does not tolerate any child labour, and demands that all of the suppliers in its supply chain prevent all forms of child labour in accordance with conventions 138 and 182 of the International Labour Organisation (ILO).

### 2.2. Wages and remuneration

The supplier is obliged to pay its employees in accordance with the applicable laws and industry standards. The supplier must provide its employees with information regarding their working conditions, including services, in a form and language which is easily understandable, such as a written employment contract and a punctual salary confirmation.

### 2.3. Working hours

The business partner is obliged not to exceed the maximum weekly working time that is applicable under local law. The supplier is required to adhere to the standards of the International Labour Organization (ILO) for working hours, holidays and rest periods.

### 2.4. On the issue of modern slavery

All of the Vollmann Group's suppliers undertake not to tolerate any form of slave labour, forced or compulsory labour, human trafficking or involuntary labour. It must be ensured that the employees are not subject to corporal punishment or inhuman treatment.

### 2.5. Freedom of association and collective bargaining

All employees have the right to freedom of association and the creation of interest-based groups. Employees are given the opportunity to freely express their thoughts regarding working conditions and to have open communication with the management.

## **2.6. Dealing with discrimination and harassment**

The supplier does not tolerate discrimination in the hiring of employees regarding their gender, age, origin or religion, sexual orientation or union affiliation.

## **3. Health and safety**

### **3.1. Safety in the workplace**

As soon as the employees of business partners are exposed to potential safety risks, the risks are prevented using suitable countermeasures such as training, preventive measures and safe working procedures. If hazards cannot be eliminated by taking suitable countermeasures, the employees must be provided with appropriate personal protective equipment.

### **3.2. Emergency planning**

The supplier confirms that it has a reporting system for emergencies, evacuation measures and emergency exercises as well as regular employee training.

### **3.3. Prevention of work accidents and occupational illnesses**

Work accidents and occupational illnesses are prevented as much as possible using appropriate systems. If a work accident occurs, the supplier is obliged to follow up and report these accidents. Measures for preventing further accidents will be initiated immediately.

## **4. Business ethics**

### **4.1. On the issue of corruption, bribery and extortion**

The Vollmann Group does not tolerate any form of corruption, bribery or extortion by its own employees or employees in the supply chain. The supplier must not accept any kind of inappropriate benefit for or from third parties, whether private or public.

### **4.2. Fair competition**

The business partner is obliged to adhere to all of the relevant competition laws and regulations, and prohibit all illegal price fixing, agreements on customer allocation and the exchange of competitively sensitive information.

### **4.3. Preventing money laundering**

The supplier must take suitable measures to prevent money laundering and terrorist financing within the company.

### **4.4. Avoiding conflicts of interest**

The supplier undertakes to conduct business in such a way that no conflicts arise between financial, private or other external interests and the duties of the employees.

#### **4.5. Protection from retaliatory measures**

The supplier will implement suitable complaint channels and correction mechanisms, which are made available to all employees and third parties, in order to be able to express concerns or complaints, but also recommendations and suggestions for improving the supplier's operation, without fear of retaliation.

### **5. Environment and climate protection**

#### **5.1. Conservation of resources**

Protecting our environment and continuously improving energy efficiency are essential values of the Vollmann Group. We expect this from all suppliers in the supply chain. For this purpose, resources such as energy carriers, water or raw materials are documented and monitored. A management system according to EMAS, DIN EN ISO 14001 or DIN EN ISO 50001 is desirable.

#### **5.2. Reducing greenhouse gas emissions and waste**

In order to ensure that emissions are continuously improved and minimized, the supplier must monitor and document all emissions in the air, water and soil, as well as waste water and waste that arise from systems or transportation.

We regard it as our social responsibility to endeavour to have a sustainable supply chain by minimizing the environmental impact, and therefore contribute to protecting the global climate.

### **6. Responsible procurement of raw materials**

#### **6.1. Dealing with conflict minerals**

The Vollmann Group expects its suppliers to adhere to all of the applicable legal regulations, such as those of the U.S. State Department and other recognized national or international institutions such as the OECD Due Diligence Guideline. If a product contains one or more of the so-called conflict minerals (tin, tantalum, tungsten or gold), the supplier is obliged to carry out an appropriate review of the supply chain to ensure that the conflict minerals are obtained from mines and smelters outside of conflict regions.

If requested to do so by the Vollmann Group, the supplier must forward all relevant information about the relevant smelters or refineries.

#### **6.2. Hazardous substance management**

The supplier must ensure that safety-related information about the substances that are used is available, and that all legal obligations for training in the handling of hazardous substances and access to appropriate personal protective equipment for employees are adhered to.

### **7. Information security and data protection**

#### **7.1. Information security**

When conducting business with the Vollmann Group, business partners must ensure that sensitive business, technical and financial information, know-how and trade secrets are appropriately protected with regard to confidentiality, availability and completeness and are not distributed without appropriate authorization and in accordance with the applicable legal requirements.

Business partners must also provide evidence of a well-engineered information security management system in accordance with DIN EN ISO / IEC 27001 or TISAX®.

If an identified, significant case of an information security breach has occurred, the Vollmann Group must be informed immediately by the supplier.

The supplier is obliged to provide the buyer with a central contact person for information security upon request, and to inform them immediately about any changes.

Reporting of information incidents → [informationssicherheit@vollmann-group.com](mailto:informationssicherheit@vollmann-group.com)

## 7.2. Rules for dealing with data protection, privacy and plagiarism

The supplier must observe all of the applicable laws for the protection of personal information. During the use, storage, processing and passing on of personal information, suitable measures must be taken to protect it from misuse.

## 8. Compliance with requirements

The Vollmann Group regards compliance with the sustainability requirements set out in this code of conduct to be essential for the respective business relationship.

We expect that the supplier has established or is implementing a due diligence process with appropriate measures to ensure that its suppliers and sub-suppliers in turn also comply with the standards and rules set out in this document.

The Vollmann Group reserves the right to check compliance with the requirements in an appropriate way.

The business partner is encouraged to report violations of this code of conduct immediately using the official contact form on the home page of the Vollmann Group.

## 9. Whistleblower system

The Vollmann Group has implemented a whistleblower system via our home page – [www.vollmann-group.com/hinweisgebersystem](http://www.vollmann-group.com/hinweisgebersystem).

A report can be made through the following channels:

- Post → Rosendahler Str. 98, 58285 Gevelsberg
- Email → [compliance@vollmann-group.com](mailto:compliance@vollmann-group.com)

All information is treated confidentially. If desired, it can also be submitted anonymously.

In order for your tip-off to be processed and investigated appropriately, it is important that the tip is as specific as possible.



Axel Vollmann  
Chief Executive Officer (CEO)  
Vollmann Group