

Code of Conduct for Suppliers and Service Providers

Revised 2022

Transparency is a core value by which Conaxess Trade operates, which means Conaxess Trade has a duty to be transparent to its suppliers about our ways of working, and that we expect that transparency in return from suppliers and service providers.

We want to ensure that the people with whom we deal live up to the high standards we expect when it comes to environmental, social and governance factors within business.

Suppliers and representatives should comply with and seek to develop relationships with their own supply chains consistent with the principles set out below and should be compliant with all local laws and the following principles as a minimum.

Human Rights

Child labour

Child labour is strictly prohibited. "Child" refers to any person younger than the statutory minimum age for employment in the country in which the activity is performed, provided the statutory age is not younger than the minimum age defined by the International Labour Organisation (ILO). Naturally, our suppliers are obligated to comply with nationally applicable laws and regulations for the protection of children and young people.

Forced labour

All forms of forced labour are strictly prohibited.

Suppliers may not compel anyone to work or enter into an employment relationship by force or intimidation (e.g. bonded labour or slavery).

As part of this prohibition, suppliers may also not force anyone to continue working by withholding pay, employee benefits, property, or documents. Suppliers are also obligated to comply with laws and regulations prohibiting human trafficking and comply with all locally applicable laws in the country or countries in which they operate.

Freedom of association

Suppliers shall grant their employees the right of association in order to protect or represent their interests in accordance with the applicable national laws. Employees may form or join an association with this purpose.

Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.



Working Conditions

Working hours

The number of weekly working hours may not exceed the maximum number prescribed by the applicable national laws and industry standards.

Furthermore, weekly working hours may not exceed 60 hours, including overtime hours, and employees must be granted at least one day off in every seven-day week. Temporary exceptions are permitted in case of emergencies and extraordinary circumstances.

Health and Safety

Suppliers must implement appropriate systems, processes, and/or measures in their organisations to ensure compliance with national occupational health and safety laws.

Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, in so far as is reasonably practicable, the causes of hazards inherent in the working environment.

This also encompasses the obligation to regularly inform employees about risks and train them by means of occupational safety exercises, for example, and provide appropriate personal protection gear. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

It must be assured that the workplace and work environment, including common areas and employee accommodations, meet the applicable hygiene standards.

Appropriate Compensation

Suppliers are obligated to pay appropriate compensation to their employees. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs and to provide some discretionary income.

The paid compensation must comply with all applicable national laws on compensation, including minimum wage laws, overtime laws, and legally prescribed employee benefits.

Employees must receive their compensation regularly, completely, and punctually.

Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Non-discrimination

Suppliers may not expose employees and potential employees to discrimination on the basis of ethnic or national background, religion, age, physical or mental disability, sex, family status, sexual



orientation, political conviction, other personal characteristics, or membership in employee organisations.

Abuse and Harassment

Employees are to be treated with dignity and respect. Suppliers shall support the protection of internationally proclaimed human rights and will not be complicit in human rights abuses.

Under no circumstances may employees be exposed to or threatened with physical, psychological, or verbal harassment or other abusive behaviour. This also includes sexual harassment, sexual abuse, and psychological abuse.

Environmental Protection

Suppliers must comply with the applicable national environmental protection laws and regulations. Suppliers shall use resources efficiently, reduce waste, and minimise any negative environmental impact on air, water, and soil.

The protection of the environment should be continuously improved, energy consumption optimised, and natural resources conserved. Employees must be instructed on how to avoid environmental risks.

Whenever possible the environmental impact of packaging and waste should be minimised or avoided.

Business Ethics

Legal Compliance

Suppliers are obligated to comply with all applicable laws and regulations of the countries in which they perform business activities or provide services.

Anti-Corruption Laws and Unlaw Payments

The offering, paying, soliciting or accepting of bribes or kickbacks, including facilitation payments, is strictly prohibited.

Suppliers must comply with the anti-corruption laws, provisions, and regulations of each country in which they perform business activities and seek to prevent and detect corruption in all business agreements with due care.

Suppliers may not offer or accept unlawful payments or in-kind donations to or from customers, suppliers, agents, government representatives, political parties, candidates for public office, or other persons. This particularly includes payments to speed up or ensure the performance of routine government activities if such payments violate local law.



Fair Competition and Anti-Cartel Law

Suppliers must observe the principles of fair competition. They are also expected to comply with applicable anti-cartel laws and regulations.

Conflict of interest

Suppliers must avoid all conflicts of interest and similar situations. Decisions must be made solely on the basis of objective business criteria and not under the influence of personal interests.

Confidential Information and Intellectual Property

The confidentiality of information exchanged in the course of business must be respected and never be used for illegal purposes or for individual gain. False information must not be given in the course of commercial negotiations.

Imports and exports

The applicable laws and regulations in the area of export and import controls and customs must be observed.

Animal Welfare

Suppliers shall treat animals humanely, including minimising pain and stress. Animal testing should be minimised, and alternatives used whenever possible.

