

Code of Conduct  
for service providers and business partners of  
VAN GRAAF GmbH

## **Preface**

VAN GRAAF takes special care to ensure that all of the company's activities are characterized by honesty, transparency, integrity, and fairness. As a service provider and business partner of VAN GRAAF, please read and understand the contents of the Code of Conduct for Service Providers and Business Partners and comply with it in all areas and business relationships. All transactions performed with or on behalf of VAN GRAAF should always be conducted heeding this Code of Conduct and following the legal requirements of the respective country of business. Should a provision in this Code of Conduct violate the national law of a country or region, the legal requirements must always be obeyed. In this case, the service provider or business partner must inform VAN GRAAF immediately. VAN GRAAF's requirements may go beyond the provisions of national and regional legislation. VAN GRAAF expects its service providers and business partners to comply with:

- National and international laws and regulations
- The International Labor Convention (ILO)
- The United Nations Universal Declaration of Human Rights
- Industry standards
- All other relevant legal provisions

## **1. Corporate responsibility**

### **Human Rights**

VAN GRAAF's service providers and business partners respect and protect the applicable worldwide regulations guaranteeing human rights as fundamental and universally valid requirements. In particular, this requires service providers and business partners of VAN GRAAF not to use forced or child labor. Furthermore, service providers and business partners must observe the regulations regarding the legal minimum age for the employment of children as set out in ILO Conventions 138 and 182.

### **Equal opportunities and non-discrimination**

The service providers and business partners of VAN GRAAF shall not discriminate based on ethnic, national, or social origin, skin color, gender, religion, ideology, age, disability, sexual orientation, or political views to the extent based on democratic principles and tolerance vis-à-vis those who see/think differently.

### **Minimum wage**

VAN GRAAF's service providers and business partners ensure that their employees receive adequate wages following the legally valid minimum that must be guaranteed. In the absence of statutory or generally binding collective bargaining agreements, payment is based on industry-specific remuneration and benefits per usual standards at the location that ensures an appropriate standard of living for employees and their families.

## **Safety at work and working hours**

VAN GRAAF's service providers and business partners comply with the workplace's applicable legal requirements for health and safety. Furthermore, they support the further development and improvement of working conditions. As a result, working hours comply, at a minimum, with the respective national legal requirements or the minimum standards of the respective national business sectors.

## **Product safety**

VAN GRAAF's service providers and business partners comply with all applicable product safety regulations and requirements, particularly the legal requirements regarding the safety, labeling and packaging of products, and the use of hazardous substances and materials.

## **Right to Organize**

The service providers and business partners of VAN GRAAF respect the right of employees to form company organizations or join external organizations under the applicable national law.

# **2. Environmental and climate protection**

## **Compliance with legal requirements**

VAN GRAAF's service providers and business partners assume responsibility concerning environmental protection issues and comply with all legal requirements concerning the environment and sustainability.

## **Increase energy and resource efficiency**

VAN GRAAF's service providers and business partners use natural resources sparingly and minimize environmental impact in their production processes and products. As a result, they contribute to reducing energy consumption and CO2 emissions. VAN GRAAF requires service providers and business partners to conserve natural resources. Negative impacts on the climate, environment, and wildlife are minimized and avoided wherever possible by reusing and recycling materials, adapting production processes, and using substitute materials. In addition, service providers and business partners are expected to develop and apply climate-friendly products and working methods to reduce greenhouse gas emissions.

# **3. Transparent business relationships and business ethics**

## **Avoiding conflicts of interest**

VAN GRAAF's service providers and business partners make their decisions solely based on objective criteria and are not influenced by personal interests and relationships.

## **Anti-corruption policy**

The service providers and business partners of VAN GRAAF do not tolerate corruption. Therefore, they ensure to the best of their ability that their employees, subcontractors, or representatives do not give, offer or accept bribes, kickbacks, unlawful donations, or other illegal payments or benefits to customers, public officials, or other third parties. This policy also applies to so-called "facilitation payments" (e.g., illegal payments to expedite routine administrative matters).

## **Prohibition of money laundering**

VAN GRAAF's service providers and business partners prevent money laundering in their companies by taking appropriate organizational measures.

## **Gifts, hospitality, and invitations**

VAN GRAAF's service providers and business partners do not offer employees or third parties, either directly or indirectly, inappropriate advantages in the form of gifts, hospitality, or invitations aimed at influencing them. Nor do they solicit or accept inappropriate benefits.

## **States as customers and dealing with authorities**

VAN GRAAF's service providers and business partners strictly comply with legal requirements when dealing with governments, public authorities, and public institutions. Furthermore, when participating in public invitations to tender, they observe the respective legal requirements along with free and fair competition rules.

## **Consultants and intermediaries**

VAN GRAAF's service providers and business partners only use consultants or intermediaries in compliance with applicable laws. In particular, they shall ensure that any compensation rewarded to consultants/intermediaries is only paid for consulting and intermediary services actually provided and that the payment is in reasonable proportion to the service rendered.

## **Contractual partners of the service providers and business partners of VAN GRAAF**

The service providers and business partners of VAN GRAAF are requested to communicate this Code of Conduct's principles to their direct contractual partners, promote compliance among these partners to the best of their ability, and ask them to follow these principles. Furthermore, they are also called upon to recommend to their contractual partners that they, in turn, call upon their contractual partners to comply with this Code of Conduct for Contractual Partners.

## **4. Data protection and intellectual property**

### **Data protection and secrecy**

VAN GRAAF's service providers and business partners shall ensure compliance with all applicable requirements for protecting personal data (in particular of employees, contractors, and customers) as well as any other obligations stemming from agreements concerning confidentiality with VAN GRAAF.

### **Intellectual property**

Service providers and business partners protect the intellectual property of VAN GRAAF and respect the intellectual property of third parties. Intellectual property includes, for example, development results, drawings, patents, trademarks, and other industrial property rights, copyrights, designs, trade secrets, samples, models, and other know-how. Furthermore, VAN GRAAF may not be supplied with products that infringe the intellectual property rights of third parties.

## **5. Reporting violations**

VAN GRAAF's service providers and business partners must report any suspected violation of legal requirements concerning this Code of Conduct. In the event of violations, the contact person at VAN GRAAF must be notified.

## **6. Violations of the Code of Conduct for Service Providers and Business Partners of VAN GRAAF**

The Code of Conduct for Service Providers and Business Partners is part of all contractual agreements with VAN GRAAF. In the event of a suspected violation of the VAN GRAAF Code of Conduct, the service providers and business partners will support VAN GRAAF in clarifying the facts. In the event of violations of this Code of Conduct, VAN GRAAF reserves the right to take appropriate action, depending on the severity of the violation. Actions may include but are not limited to the request to immediately rectify the violation, declare claims for damages, or terminate the contract. Furthermore, in the event of severe violations of this Code of Conduct, VAN GRAAF reserves the right to extraordinary termination with cause.

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### **Declaration of the service provider/business partner**

With this, we confirm that we have received and understood the Code of Conduct for Service Providers and Business Partners of VAN GRAAF. Furthermore, we verify that we are aware of all relevant legal requirements of the countries in which our company operates. We will report any suspected violations of this Code of Conduct.

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Place, Date

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Company name in block letters

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Company stamp

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Signatory in block letters

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Signature of the signatory