

CORPORATE POLICY · RESPONSIBLE PROCUREMENT

Supplier & Subcontractor Code of Conduct

The environmental, social and ethical standards we require of every supplier, subcontractor and operational service partner who works with Resourcify — and how we verify them.

DOCUMENT OWNER
**Ethics & Compliance
Officer**

APPROVED BY
**Management of
Resourcify GmbH**

ISSUE DATE
July 2026

ACCEPTANCE
**Condition of doing
business**
Signature or equivalent own
code

APPLIES TO
**Suppliers,
subcontractors &
service partners**

REVIEW CYCLE
Annual
Next review: July 2027

VERSION
1.0

CLASSIFICATION
Public

Why this Code exists. Resourcify's platform organises real material flows — collection, transport, recycling and disposal — executed by partners. Our customers' trust in their programmes is only as good as the practices of everyone in that chain. This Code makes our expectations explicit and binding: doing business with Resourcify means meeting these standards, evidencing them on request, and fixing gaps when we find them.

1 Scope and application

This Code applies to all suppliers, subcontractors, freelancers and service providers of Resourcify GmbH, including:

- **Technology and data-hosting vendors** — cloud infrastructure, software and IT services that store or process data on our behalf;
- **Operational service partners** — logistics, transport, recycling, treatment and disposal partners engaged for customer programmes and take-back systems;
- **Goods suppliers** — packaging and collection materials (e.g. take-back boxes and containers), office supplies and IT equipment;
- **Professional and facility services** — advisors, agencies, office and event providers.

Acceptance of this Code — by signature, by contract clause, or by demonstrating an equivalent own code of conduct — is a condition of entering or renewing a business relationship with Resourcify. Suppliers are responsible for holding their own subcontractors in our supply chain to the same standards.

2 Legal compliance and licences

Suppliers comply with all applicable laws and regulations in every country where they perform work for Resourcify. Partners performing regulated activities — in particular the collection, brokering, transport, treatment or disposal of waste — must hold and maintain all required permits, registrations and certifications (in Germany, for example, transport permits under §53/§54 KrWG and, where applicable, Entsorgungsfachbetrieb certification), and must provide current evidence of them at onboarding and upon renewal or request. Loss, suspension or expiry of a required licence must be reported to Resourcify without delay.

3 Labour and human rights

Suppliers respect internationally recognised human rights, consistent with the ILO core conventions, the UN Guiding Principles on Business and Human Rights and our own *Human Rights & Labour Standards Policy* (RSF-POL-002). At minimum, suppliers:

- employ **no child labour** and **no forced, bonded, trafficked or involuntary labour** in any form;
- pay at least the applicable legal minimum wage, on time, and observe legal limits on working hours and rest periods;
- respect employees' **freedom of association** and right to collective bargaining;
- tolerate no discrimination or harassment in recruitment or employment;

- provide **safe and healthy working conditions** — with particular rigour in physical waste handling: trained personnel, protective equipment, safe handling of hazardous materials, and accident prevention and reporting; and
- employ only workers with a legal right to work, under documented terms of employment.

4 Environment

Suppliers comply with applicable environmental law, prevent pollution, and handle waste, hazardous substances, emissions and discharges responsibly and lawfully. Operational partners in our value chain must ensure that materials entrusted to them are actually treated through the agreed recovery or disposal route and documented accordingly — misdeclaration of waste treatment is grounds for immediate termination. We favour suppliers who measure and reduce their energy use and greenhouse-gas emissions and can evidence an environmental management approach, in line with our *Environmental & Sustainability Policy* (RSF-POL-009).

5 Business ethics

- **No corruption:** no offering, giving, requesting or accepting of bribes, facilitation payments, kickbacks or improper advantages — in dealings with Resourcify, our customers, or public officials.
- **Fair competition:** no price-fixing, market or customer allocation, bid-rigging, or abuse of market position.
- **Conflicts of interest** affecting the relationship with Resourcify are disclosed proactively.
- **Financial integrity:** accurate books and records; no involvement in money laundering; compliance with applicable sanctions and export-control regimes.
- **Gifts and hospitality** towards Resourcify employees stay modest and infrequent (see RSF-POL-001); none during active tenders or negotiations.

6 Information security and data protection

Suppliers who access, store or process Resourcify or customer data must protect it with appropriate technical and organisational measures, process personal data only under a data-processing agreement compliant with Art. 28 GDPR, report security incidents affecting our data **without undue delay**, and support our incident-response and notification obligations. Data-hosting vendors must evidence recognised security practice (e.g. ISO 27001, SOC 2 or equivalent) and, for services we designate as critical, maintain documented business continuity and disaster-recovery arrangements.

7 How we select, assess and monitor suppliers

STAGE	WHAT HAPPENS
Risk classification	Every supplier is classified at onboarding by criticality and ESG risk (activity type, geography, data access, spend). Waste-handling partners and data processors are always at least "elevated".
Onboarding due diligence	Proportionate screening: legal existence and sanctions check for all; an ESG self-assessment questionnaire for elevated-risk suppliers; licence and certification verification for operational partners; security and data-protection review for data processors.
Contractual flow-down	New and renewed contracts and purchase-order terms incorporate this Code (or the supplier's accepted equivalent) and, where relevant, GDPR Art. 28 terms and licence-maintenance obligations.
Ongoing monitoring & audits	Critical and elevated-risk suppliers are reviewed at least annually. Operational partners are additionally audited under our partner due-diligence programme: initial audits at onboarding, interval audits on a defined cycle, incident audits on trigger — covering legal compliance and licences, traceability, sustainability, health & safety, operations and data privacy, scored against a weighted methodology with knock-out criteria. Results are banded Approved ($\geq 80\%$), Approved with Conditions (60–79%, action plan and follow-up) or Not Approved ($< 60\%$).
Non-compliance	Findings trigger a corrective-action plan with deadlines. We prefer improvement over exit — but unremedied material breaches, or any confirmed child/forced labour, corruption or waste misdeclaration, end the relationship.

8 Raising concerns

Suppliers, their employees and their subcontractors can report suspected violations of this Code — confidentially and without fear of retaliation — to ethics@resourcify.com. Anonymous reports are accepted. Reports are handled under the procedure described in our *Code of Conduct* (RSF-POL-001); retaliation by a supplier against a reporting worker is itself a violation of this Code.

9 Objectives and indicators

OBJECTIVE	INDICATOR	TARGET
Our standards are contractually anchored	New/renewed critical & elevated-risk suppliers with accepted Code (or equivalent)	100%
Regulated partners are demonstrably licensed	Operational partners with verified, current licences on file	100%, checked at onboarding and annually
Risk is assessed before problems occur	Critical & elevated-risk suppliers with completed annual review	100%
Data processors meet GDPR requirements	Active data processors with Art. 28 DPA in place	100%
Issues get fixed, not filed	Corrective-action plans closed on schedule	≥ 90%; unresolved material breaches escalated to management

10 Governance and review

This Code is owned by the Ethics & Compliance Officer, approved by the management of Resourcify GmbH, published on our website, and reviewed annually. The register of suppliers, risk classifications, accepted codes and review outcomes is maintained centrally; a summary is reported to management once a year.

11 Related documents

RSF-POL-001	Code of Conduct & Business Ethics Policy
RSF-POL-002	Human Rights & Labour Standards Policy
RSF-SOP-005	Legal Compliance & Regulatory Monitoring Procedure
RSF-POL-006	Enterprise Risk Management Policy
RSF-POL-009	Environmental & Sustainability Policy
RSF-POL-011	Information Security & Data Protection Policy

12 Document control

VERSION	DATE	AUTHOR / OWNER	CHANGE
1.0	July 2026	Ethics & Compliance Officer	First consolidated edition. Extends the environmental purchasing principles applied since 2022 (office and travel procurement) into a binding, full-scope ESG code covering technology vendors, goods suppliers and operational waste-management partners, with a risk-based assessment process.

Adopted by the management of Resourcify GmbH, Hamburg.



Gary Lewis
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