



Supplier Code of Conduct

Bergolin GmbH & Co. KG

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Bundesrepublik Deutschland (Germany)

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1. Preamble

Bergolin GmbH & Co. KG is an internationally active developer and producer of high-quality coating systems for various market segments. Within the scope of this activity, we procure various raw materials nationally and abroad and bear a high degree of responsibility towards the respective countries, markets, customers, competitors, the environment and also towards our employees. As a company active in the chemical industry, the implementation of and compliance with the relevant legal regulations and other relevant standards is an essential requirement that must be strictly observed. Bergolin GmbH & Co. KG has therefore committed itself to environmentally and socially responsible corporate management. We expect the same behavior from our suppliers. We also require our employees to respect the principles of environmentally and socially responsible and ethical behavior and to integrate these principles into our corporate culture. In addition, we continuously strive to optimize the sustainability of our corporate activities and our products and ask our suppliers to contribute to these efforts in the sense of an integrated approach.

For future cooperation, the contracting parties therefore agree on the validity of the following rules for a common code of conduct. This agreement forms the basis for all future deliveries. The contractual partners undertake to comply with all principles and requirements of the Supplier Code of Conduct. In addition, our suppliers are requested to also contractually obligate their potential sub-suppliers to comply with the standards and rules set out in this document. This agreement comes into force upon signature. A violation of this Suppliers Code of Conduct may be cause and reason for our company to terminate the business relationship, including all related supply contracts.

This Suppliers Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, Guiding Principles on Children's Rights and Child Labor, the United Nations Guiding Principles on Business and Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, and the chemical industry's global Responsible Care program. We expect our suppliers to comply with all relevant laws and regulations as well as the requirements of the standards.



2. Requirements for suppliers

The requirements placed on our suppliers with regard to social responsibility, responsibility towards the environment and business ethics are defined below.

2.1 Social responsibility

With regard to social responsibility in the supply chain, the following requirements must be complied with:

- **Elimination of forced labour**

No forced labor or similar form of unauthorized work may be used. All work must be voluntary and workers must have the option to terminate the work or employment relationship at any time. No worker shall be subjected to unacceptable treatment such as mental cruelty or sexual or other personal harassment.

- **Prohibition of child labour**

Child labor is prohibited at every stage of production. Suppliers are required to comply with the ILO conventions on the recommended minimum age for the employment of children. According to these recommendations, the age should not be below the age at which compulsory schooling ends, and should further not be below 15 years of age in any case. The rights of juvenile workers must be protected and the special protective provisions applicable to them must be observed.

- **Fair wages**

The wage for regular working hours and overtime must be at least equal to the statutory national minimum wage or the industry minimum wage, whichever is higher. If the wage is not sufficient to cover the usual cost of living and at the same time provide the employee with a minimum level of savings, the supplier is obliged to increase the employee's wage to reach a level sufficient for this purpose. All benefits required by law shall be provided to employees. Wage deductions as a punitive measure are not permitted. The supplier shall ensure that workers receive clear, detailed and regular written information on the composition of their wages.



- **Fair working hours**

Working hours must comply with applicable laws and industry standards. As a rule, overtime is only permissible if it is worked on a voluntary basis and a company agreement valid in the respective country, a collective bargaining agreement valid in the respective country or an employment contract valid in the respective country does not stipulate otherwise and a total of 12 hours of overtime per week are not exceeded. After six consecutive working days, the employee must be granted at least one day off. The total weekly working time may not regularly exceed 48 hours.

- **Freedom of association**

The right of workers to form and join organizations of their choice and to bargain collectively (e.g. join trade unions) must be respected. In cases where freedom of association and the right to hold collective meetings are restricted by law, alternative means of independent association of workers for the purpose of collective bargaining must be permitted. Employee representatives must be protected from discrimination. They shall be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner. The supplier shall respect the right of workers to freedom of association, to join trade unions, to appoint workers' representatives and to join works councils in accordance with applicable local laws. It must be possible for workers to communicate openly and without fear of reprisals or harassment.

- **Prohibition of discrimination**

Discrimination against employees in any form is prohibited. This applies, for example, to discrimination based on gender, race, caste, skin color, disability, political opinion, family background, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each and every individual shall be respected.

- **Health protection and occupational safety**

The supplier is responsible for a safe and healthy working environment. By setting up and using suitable occupational health and safety systems, the necessary preventive measures are taken against accidents and damage to health that may occur in connection with activities at the workplace. Employees are regularly informed about the applicable health and safety standards and measures and are trained



accordingly. Employees have access to sufficient quantities of drinking water and to clean sanitary facilities.

- **Dealing with conflict minerals**

Bergolin GmbH & Co. KG does not use conflict minerals. Should the supplier handle conflict minerals such as tin, tungsten, tantalum, gold and cobalt, processes in accordance with the OECD Due Diligence Guidedance for Responsible Supply Chains of Minerals from Conflict Affected Areas and High Risk Areas and other relevant regulations shall be followed. The smelting and refining of these materials without adequate and audited due diligence processes shall be avoided.

- **Complaint mechanism**

At the operational level, the supplier is responsible for establishing an effective complaint mechanism for employees and communities who may be affected by or have become aware of possible violations of applicable laws and standards. Employees who file a complaint about violations of this Suppliers Code of Conduct or applicable laws shall not be subject to disciplinary action in any form.

2.2 Environmental responsibility

With regard to environmental responsibility in the supply chain, the following requirements must be met:

- **Treatment and discharge of industrial wastewater**

Wastewater from operations, production processes and sanitary facilities is to be typed, monitored, inspected and, if necessary, treated before it is discharged or disposed of. In addition, measures to reduce wastewater generation must be introduced.

- **Dealing with air emissions**

General emissions from operations (air and noise emissions) and greenhouse gas emissions, before they are released, shall be typed, routinely monitored, and treated as needed. It is also the supplier's responsibility to monitor its emission treatment systems and identify and implement cost-effective solutions to minimize all emissions.



- **Dealing with air emissions**

The supplier shall pursue a systematic approach in order to identifying waste, managing it, reducing it, and disposing of or recycling it. Chemicals and other materials that pose a danger when they are released into the environment are to be identified and managed in such a way that safety is ensured when handling, transporting, storing, using, and recycling or disposing of these materials.

- **Reducing consumption of raw materials and natural resources**

The use and consumption of resources during the production process and the generation of waste of any kind, including water and energy, shall be reduced and avoided. This is done either directly at the point of waste generation or through processes and measures - for example, by changing production or maintenance procedures or processes in the company, by using alternative materials, by savings, by recycling or by reuse.

- **Dealing with energy consumption of raw materials and natural resources**

Energy consumption is to be monitored and documented. Cost-saving solutions are to be found to improve energy efficiency and minimize energy consumption.

2.3 Business ethics

With regard to business ethics in the supply chain, the following requirements must be observed:

- **Fair competition**

The standards and laws of antitrust and competition law must be observed and complied with. It is therefore prohibited in particular to enter into price and territorial agreements, agreements on market shares, production or capacity agreements and agreements on the allocation of customers or orders with any competitors and market participants.

- **Privacy and data security**

When collecting, storing, processing, transmitting and forwarding personal and other data, the supplier shall observe and comply with the laws on data protection and information security as well as the official requirements.



- **Intellectual property**

Intellectual property rights shall be respected; the transfer of technology and expertise shall be done in a way that protects intellectual property rights and customer information.

- **Integrity, corruption, personal gains**

The highest standards of integrity must be applied in all business activities. The supplier shall have a zero tolerance policy with respect to the prohibition of bribery, corruption, extortion and embezzlement. The supplier shall not offer, promise or grant any gratuity in order to gain favor. This includes any amenities such as money, in-kind services, travel, services and other benefits and conveniences. Procedures shall be in place to monitor and implement standards to ensure compliance with anti-corruption laws.

- **Money laundering**

Suppliers have to make sure that Bergolin GmbH & Co. KG is not misused for money laundering or other illegal purposes. Money laundering is any financial or economic transaction by which illegally acquired liquid funds are infiltrated into the legal financial system. This is a punishable illegal act.

- **Embargo and trade control regulations**

All suppliers has to comply with national and international laws and embargoes and, in particular, shall check whether an official permit must be obtained for the export or domestic trade of goods, technologies or services. If necessary, this must be obtained in due time. Each supplier must also observe and implement the relevant laws and standards on the lawful packaging and lawful transport of goods.

3. Implementation of requirements

We expect our suppliers to identify risks within the supply chains and to take appropriate measures. In case of a suspected violation as well as to safeguard supply chains with heightened risk, the supplier will inform Bergolin GmbH & Co. KG immediately and, if necessary, regularly about the identified violations and risks as well as about the measures taken. Bergolin GmbH & Co. KG will verify compliance with the standards by means of a self-assessment questionnaire and, if necessary, through sustainability audits at the supplier's production sites. The supplier agrees to Bergolin GmbH & Co. KG to conducting such



audits to monitor compliance with the Supplier Code of Conduct at the supplier's production facilities during normal business hours, with sufficient advance notice and carried out by persons appointed by the client to do so. The Supplier may object to specific audit measures if such measures violate mandatory provisions of data protection regulations. If a violation of the rules of this Supplier Code of Conduct is identified, Bergolin GmbH & Co. KG shall notify the supplier in writing within one month and set a suitable period of time within which the identified deviations can be remedied. If the violation was caused culpably and this renders the continuation of the contract until its due termination is unacceptable for Bergolin GmbH & Co. KG, we may terminate the respective contract upon the expiration of the stated time period if Bergolin GmbH & Co. KG has threatened to do so when setting the period of time. The legal right to extraordinary termination without providing an additional time period shall remain unaffected, setting a grace period shall remain unaffected, as shall the right to claim damages.

4. Information and consent of the supplier

By signing this document, the supplier commits to act responsibly and to have understood and to comply with the principles and requirements stated herein. The supplier further commits to communicate the contents of this Supplier Code of Conduct in an comprehensible manner to employees, contractors and subcontractors and to take all necessary precautions to comply with these requirements.

Supplier Name:	
Supplier Address:	
Signee Name:	
Signee Function:	
Signature:	
Location and Date, Stamp:	