

# SUPPLIER CODE OF CONDUCT

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**V**TG Group is committed to conducting business ethically and responsibly, advancing solutions that address some of the most pressing challenges of our time, operating safely and sustainably, continuously monitoring and improving our environmental footprint, and being a responsible, good neighbor in the communities where we operate. VTG Group has a “zero tolerance” policy when it comes to unethical business behavior, such as corruption, bribery and forced labor.

As well as country specific statutes and official requirements, the following serve to reinforce and interpret the principles outlined below: the UN’s Universal Declaration of Human Rights, the conventions of the International Labour Organisation (ILO), the OECD Guidelines for Multinational Enterprises, the principles of the UN Global Compact, and the general principles pertaining to Anti-Corruption and Competition Laws.

**IN SUPPORT OF OUR COMMITMENT, WE EXPECT OUR SUPPLIERS TO:**

- Comply with applicable laws and adhere to internationally recognized environmental, social and governance (ESG) standards, including those set forth in our Health, Safety and Environmental Policy (document: Sustainability Management – Management systems and ESG topics);
- Conduct business ethically and with integrity, protect human rights, provide for the safety and well-being of their employees, and operate in an environmentally responsible manner;
- Share the principles expressed in this Supplier Code of Conduct;
- Strive to apply similar standards with its own suppliers and across the value chain; and
- Train its employees, agents and subcontractors accordingly and assess the success of the training measurements.

# ENVIRONMENT

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- Minimize negative impact on biodiversity, climate change and water scarcity;
- Use resources efficiently, seek to reduce water use and greenhouse gas emissions, and encourage the use of energy-efficient technologies in their production and services;
- Responsibly manage and seek to reduce waste, wastewater discharge, and air emissions and to increase the use of renewable energies;
- Promote the safe and environmentally sound development, manufacturing, transport, use, and disposal of products, and ensure product quality and safety meet applicable standards and requirements;
- Utilize management systems, such as ISO 14000 or ISO 50001 to continuously improve environmental performance; and
- Whenever possible, participate in industrial, national, and international initiatives with positive effects on environment.



# SOCIAL

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- Comply with all applicable health and safety labor and employment laws and regulations;
- Protect the health and safety of employees, contractors and local communities and operate with a goal of zero injuries and incidents;
- Ensure by using appropriate management systems such as 45001 that a systematical Health and Safety system is implemented and respected;
- Respect employees and provide a workplace free of discrimination, including workplace harassment or abuse;
- Prohibit any discrimination on the grounds of gender, color, race, age, religion or ideology, social class or origin, ethnic and national origin, caste, disablement, marital or family status, pregnancy and physical characteristics, membership of employee organizations including unions, political opinion, sexual orientation or any other personal characteristics;
- Observe and comply with minimum wages and working hours in accordance with local laws and current industry standards (the stricter regulation shall apply). Weekly working hours should not regularly exceed 48 hours. Overtime must be worked on a voluntary basis and may not amount to more than 12 hours per week. Every employee shall have the right to at least one free day (twenty-four consecutive hours) after six successive workdays;
- Provide adequate vacation entitlement and maternity leave, taking into account local statutory requirements;
- Ensure compensation of a living wage according to local living conditions; and
- Recognize and uphold the freedom of association and the right to collective bargaining in accordance with applicable laws.

# GOVERNANCE

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- Conduct business in a fair and ethical manner and abide by all applicable laws and regulations, including but not limited to antitrust, trade controls, and sanction regimes;
- Forbid all types of bribery, corruption and money laundering and comply with applicable anti-corruption laws;
- Avoid and disclose to VTG Group any situation or circumstance that may appear to create a conflict of interest;
- Respect the privacy and confidential information of all employees and everyone they do business with and protect data and intellectual property from misuse, theft, fraud or improper disclosure;
- Protect information and communication systems against unauthorized disclosure and manipulation and guarantee their availability;
- Undertake to respect all intellectual property belonging to VTG Group as well as to any third parties, in particular trademarks, patents, designs, domain names and copyrights as well as know-how and trade secrets and to comply with applicable intellectual property and trade secret laws;
- Implement appropriate systems and controls, which facilitate compliance with applicable laws, regulations, and standards;
- Comply with applicable tax laws and must not participate in artificial business practices or transactions that have been established purely for tax-evasion purposes and apply principles of true and fair accounting and keep accurate books and records;
- Empower employees and other stakeholders to anonymously report concerns or potentially unlawful practices at the workplace without retaliation;
- Support the protection of internationally recognized human rights and prohibit the use of forced, indentured or involuntary labor (including modern slavery and human trafficking) and child labor;

- Comply with, and provide documentation needed to facilitate VTG Groups compliance with, applicable laws, regulations, and disclosure requirements related to conflict minerals; and
- Take reasonable efforts to avoid in its products the use of raw materials, which directly or indirectly finance armed groups, who violate human rights.

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VTG Group encourages the Supplier and its employees to report any violations of this Code of Conduct or the applicable laws related to VTG Group and its brands. Such reports can be made via our integrity line on our website.



Below are listed the most important principles, standards and conventions that served as a basis for the development of the Code of Conduct. These can be subject to changes beyond our control:

- The UN Universal Declaration of Human Rights
- The UN Global Compact Principles
- The OECD Guidelines for Multinational Enterprises
- International Labour Organization Conventions such as:
  - ILO Conventions on Worst Forms of Child Labour (C182), Minimum Age (C138) and Night Work of Young Persons (C079)
  - ILO Conventions on Forced Labour (C029) and Abolition of Forced Labour (C105)
  - ILO Convention on Occupational Safety and Health (C155)
  - ILO Conventions on Discrimination (C111) and Vocational-Rehabilitation and Employment (Disabled Persons) (C159)
  - ILO Conventions on Hours of Work (C001) and Weekly Rest (C014)
  - ILO Conventions on Remuneration (C026 and C131)
  - ILO Conventions on Freedom of Association and Collective Bargaining (C087, C098, C135 and C154)
  - ILO Convention on Human Resources Development (C142)