



Code of Conduct for suppliers

HME GmbH Dichtungssysteme

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01

Introduction / Preamble

HME GmbH Dichtungssysteme is committed to responsible, lawful and sustainable business conduct. Integrity, reliability, quality as well as respect for people and the environment form the basis of our business relationships.

This Supplier Code of Conduct defines the **minimum requirements** we expect our suppliers to comply with. It takes into account the requirements of the **German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG)** as well as recognized international standards, in particular the core labour standards of the **International Labour Organization (ILO)**, the **OECD-Guidelines for Multinational Enterprises** and the principles of the **UN Global Compact**.

This Code applies to all suppliers of HME GmbH Dichtungssysteme and serves as a basis for supplier selection, evaluation and cooperation. Suppliers are encouraged to promote the principles set out in this Code in an appropriate manner throughout their own supply chains.

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Organizational Duties and Compliance Responsibility

Suppliers shall implement appropriate organizational measures to ensure compliance with this Supplier Code of Conduct. These measures include in particular:

- the definition of clear responsibilities for compliance and sustainability matters
- the identification of material human rights, environmental and legal risks
- the implementation of internal policies, codes of conduct or comparable rules
- appropriate measures to inform and raise awareness among employees

The scope and nature of these measures shall be appropriate to the size, structure and risk profile of the supplier.

03

Human Rights, Working Conditions and Health & Safety

3.1 Respect for Human Rights

Suppliers commit to respecting internationally recognized human rights and to refraining from any actions that may contribute to human rights violations.

In particular, the following are prohibited:

- child labour
- forced labour, modern slavery and human trafficking
- inhuman, degrading or humiliating treatment

3.2 Faire Arbeitsbedingungen

Suppliers shall ensure that:

- working hours comply with applicable legal and industry standards
- at least the legally required or customary industry remuneration is paid
- equal treatment and non-discrimination are guaranteed
- freedom of association and the right to collective bargaining are respected

3.3 Health and Safety

Workplaces must be designed to be safe and conducive to health. Risks to the safety and health of employees must be systematically identified, assessed and minimized through appropriate measures. Employees shall be regularly informed and trained regarding applicable occupational health and safety requirements.

The use of security services must not result in human rights violations.

04

Environment, Sustainability and Responsible Use of Resources

Suppliers commit to minimizing environmental impacts and complying with all applicable environmental laws and regulations.

This includes in particular:

- the reduction of emissions, waste and wastewater
- the responsible use of water, energy and raw materials
- the proper handling and disposal of hazardous substances
- the protection of soil, water bodies and air

International environmental agreements, in particular the **Basel Convention**, the **Minamata Convention** and the **Stockholm Convention**, must be observed.

The implementation and continuous improvement of environmental management systems (e.g. ISO 14001 or equivalent systems) is expressly encouraged.

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Conflict Minerals and Responsible Supply Chains

Suppliers are encouraged to take appropriate measures to ensure the responsible sourcing of conflict minerals (in particular tin, tantalum, tungsten and gold) and to identify and mitigate risks arising from conflict-affected or high-risk areas.

Where relevant, transparent sourcing and adherence to recognized international due diligence standards, in particular the OECD-Guidelines, are expected.

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Integrity in Business Conduct

6.1 Corruption and Bribery

Corruption, bribery, extortion, the granting or acceptance of improper advantages or any other form of undue influence are strictly prohibited. Business decisions must be made independently, transparently and solely on the basis of objective criteria.

6.2 Fair Competition

Suppliers shall comply with all applicable antitrust and competition laws. In particular, the following practices are prohibited:

- price or condition fixing
- market or customer allocation
- abusive or anti-competitive market practices

6.3 Conflicts of Interest

Actual or potential conflicts of interest must be disclosed and, where possible, avoided.

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Export Controls and Trade Sanctions

Suppliers commit to complying with all applicable export control, customs and sanctions regulations, in particular those of the European Union.

All required permits and approvals must be obtained in a timely manner. Suppliers shall support HME GmbH Dichtungssysteme, where necessary, by providing relevant information.

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Data Protection, Intellectual Property and Trade Secrets

Suppliers are required to appropriately protect personal data, confidential information as well as the intellectual property of HME GmbH Dichtungssysteme and third parties.

Data must be safeguarded against unauthorized access, loss or misuse and processed exclusively in accordance with applicable legal requirements.

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Implementation, Monitoring and Audits

HME GmbH Dichtungssysteme applies a **risk-based approach** when monitoring compliance with this Supplier Code of Conduct.

Depending on the identified risk level, the following measures may be used in particular:

- self-assessments
- discussions
- appropriate reviews or audits

Audits shall only be conducted following prior coordination and with due regard to legitimate confidentiality interests.

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Reporting and Complaint Mechanism

Suppliers shall ensure that employees and potentially affected parties have the opportunity to report violations of this Supplier Code of Conduct or human rights or environmental risks confidentially and without fear of retaliation.

Reports may also be submitted directly to HME GmbH Dichtungssysteme and will be treated confidentially.

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Violations and Consequences

In the event of violations of this Supplier Code of Conduct, HME GmbH Dichtungssysteme expects prompt and appropriate remedial action.

Remedial measures shall take precedence. Termination of the business relationship shall only be considered as a **last resort** if serious violations cannot be remedied within a reasonable period of time.

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Validity and Acknowledgement

This Supplier Code of Conduct forms an integral part of the business relationships of HME GmbH Dichtungssysteme. By entering into or continuing a business relationship, suppliers acknowledge this Code as a binding basis and commit to communicating its contents internally in an appropriate manner.