

Thermottraffic is committed to ecologically and socially responsible management of its operations. At the same time, we strive to optimize our business activities and our services continuously in terms of sustainability.

The principles of ecological, social, and ethical behavior apply to all employees in the company without exception. We also expect the same behavior, especially compliance with minimum social standards, from our business partners, service providers, and suppliers (hereinafter referred to as “business partners”). We expect them to support our comprehensive efforts to achieve sustainability so that we can jointly make a positive contribution to the planet’s future.

The provisions of this Code of Conduct apply in addition to any other legal agreements (e.g. terms and conditions) or contracts between Thermottraffic and its business partners. Business partners are requested to include compliance with the minimum standards listed in this document in any contracts with their subcontractors.

## **Compliance with legal regulations and ethical principles**

Business partners must comply with all laws applicable to their company. Business partners must support the principles of international agreements such as the United Nations Universal Declaration of Human Rights, the United Nations Global Compact, and the 1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work in accordance with national laws and customs. This applies in particular to:

### **1. Human rights**

Human rights and, in particular, human dignity are to be respected as elementary prerequisites for everything done in the course of business.

### **2. Ban on child labor**

Business partners must accept children’s rights to further education and training. They are not allowed to participate in or tolerate child labor. In this regard, business partners must observe ILO recommendations for the minimum age for the employment of children. No child under the legal minimum working age in the respective country or legal system may be employed. If there is no minimum age for employment, business partners agree not to employ children under 15 years of age. Employees under the age of 18 may only be employed outside of school hours and only in accordance with the legal requirements (e.g. with regard to working hours and conditions).

### **3. Forced labor**

All forms of forced labor are prohibited. Work must always be done voluntarily, without the use of corporal punishment, physical coercion, or verbal abuse.

### **4. Ban on discrimination**

The equal treatment of all employees must be an essential principle of the corporate policy for all business partners. Business partners must observe the principle of equal opportunities. Individuals may not be discriminated against on the basis of personal characteristics, such as ethnic origin, color, disability, world view, religion, social origin, political attitude, nationality, position, pregnancy, age, gender, gender identity, sexual orientation, or other illegal criteria. Business partners must ensure that their employees are not harassed in any way.

### **5. Remuneration and working hours**

Business partners must comply with all applicable national laws and binding industry standards on working hours, overtime, wages, and salaries as well as other employer benefits. Business partners must ensure that their employees’ remuneration is lawful, including any overtime and bonuses, and that the same work receives the same pay in a non-discriminatory manner. The remuneration and other allowances must be clearly defined and paid regularly. Disciplinary measures may not take the form of a reduction in earned wages.

Business partners must ensure that the working hours of their employees do not exceed the maximum daily/weekly working hours permitted in the country where the employment contract was signed. Overtime is only permitted if done on a voluntary basis and is not conflict with the regulations of the respective country.

## **6. Freedom of association**

Employees of all business partners must be free to choose whether to join or not join a trade union or employee representative body of their choosing without threats or intimidation. Business partners must respect and recognize this right without discriminating against employees for exercising it.

## **7. Workplace health and safety**

Business partners are responsible for a safe and healthy work environment. They must ensure that all employees are regularly informed and trained about applicable health protection as well as safety standards and measures. This also includes regular risk assessments of workplaces and the implementation of suitable hazard prevention and precautionary measures.

## **8. Environment**

Business partners assume full responsibility for their environmental balance and must thus comply with applicable environmental laws, regulations, and standards. They will proactively take steps to improve their company's performance and environmental balance over the long term in order to protect the environment and maintain the health of humans and animals.

## **9. Privacy and disclosure of information**

Business partners agree to comply with the applicable data protection and security laws and regulations of the EU or the regulations applicable in the respective country. This applies in particular to personal data from customers, consumers, employees, and service providers. Business partners must protect confidential information and only use it appropriately. This also means that business partners will not disclose any information that is not already known to the public.

## **10. Bribery and corruption**

The business partners will adhere to all applicable national and international anti-corruption laws, regulations, and standards. Business partners must pursue a zero-tolerance policy with the prohibition of all forms of bribery, corruption, extortion, and embezzlement. Business partners must comply with all applicable trade and import regulations, including sanctions and embargoes that apply to their activities. This also includes compliance checks against the relevant watch and sanction lists of the EU, UN, UK, and US governments.

## **11. Money laundering and financial records**

Business partners must comply with all applicable laws and regulations to combat money laundering. Business partners will keep financial records and prepare reports in accordance with international laws and regulations.

## **12. Fair competition**

Business partners must comply with applicable free competition and antitrust laws.

## **13. Complaint mechanisms**

Business partners will have an effective internal reporting system for violations of the aforementioned rules of conduct, including the opportunity to make reports anonymously (whistleblower protection). They must ensure that employees/persons who report a (possible) violation of these rules of conduct or relevant laws are not disciplined or disadvantaged in any way. Reporting system Thermottraffic: via E-Mail: [compliance@thermottraffic.info](mailto:compliance@thermottraffic.info) / via mail (anonymous): Thermottraffic GmbH, **Complaint management personal/confidential**, Im Industriegelände 60-66, 33775 Versmold.

## **14. Compliance with this Code of Conduct for Business Partners**

Thermottraffic reserves the right to check compliance with the requirements of this Code of Conduct for Business Partners after giving appropriate advance notice. Thermottraffic encourages its business partners to introduce their own binding guidelines for ethical, social, and ecological behaviors in the workplace. Any breach of the obligations set forth herein shall be considered a material breach of contract on the part of the business partner.