



# CODE OF CONDUCT

for Business Partners

# EVVA CODE OF CONDUCT

## for Business Partners (suppliers and partners)

When you have been internationally renowned for your reliability and numerous innovations for over 100 years, you have high expectations of yourself. Especially when it comes to ethically correct behavior and the trust placed in us. EVVA has built up an excellent reputation since 1919. A reputation that we will not put at risk. At EVVA, we want to be a role model and behave in a way that reflects our values as a family business. We take responsibility for people, for society and for protecting the environment. There can be many reasons for doing the wrong thing. Whether out of greed, lack of respect or simply thoughtlessness. But whatever others do – we stay on the right path.

Our principles of conduct set out here in the EVVA Code of Conduct explain to our suppliers and partners (referred to as “business partners” in the document) how we act and operate in a legally compliant and responsible manner. It helps us all to make the right decisions so that we can always look in the mirror as honest, reliable and fair people.

In addition to the obligation to comply with laws and regulations at national and international level, EVVA acts in accordance with the group-wide guidelines:

- EVVA Code of Conduct for Employees
- EVVA Human Rights Policy
- EVVA Diversity Policy

### Who does the Code of Conduct (CoC) apply to?

This CoC defines our compliance requirements and expectations of our business partners. Our common goal: long-term, successful and legally compliant cooperation. We can only be economically successful if the impact of our own business activities and those of our business partners are in harmony with people and the environment. We therefore also expect our business partners to comply with the principles set out in this CoC and to select their own suppliers and business partners according to comparable criteria.

[www.evva.com](http://www.evva.com) – here you will find the company mission statement, values, CoC, EVVA policies and everything to do with sustainable action at EVVA.

## 1. RESPONSIBILITY IN THE VALUE AND SUPPLY CHAIN

EVVA assumes responsibility in its value and supply chain. We also expect our business partners to continuously monitor and document sustainability risks, e.g. with regard to climate change, biodiversity, etc., both in their own business area and in the value chain, and to pass these on to their direct suppliers in particular. This EVVA Code of Conduct forms the basis for the actions expected of our business partners and for any joint cooperation.

### a. General framework conditions

EVVA takes the following measures to assume responsibility along the value chain with the necessary care:

- The management incorporates the duties of care in the value chain into its entrepreneurial, strategic actions, defines goals and demands their implementation.
- Technical and organizational measures for due diligence in the value chain are integrated into existing compliance processes.
- The management transfers responsibility for operational implementation to the compliance team with coordinated cooperation between the affected areas of the company.
- We identify and evaluate negative impacts on human rights and the environment along the value chain with the help of our EVVA Business Partner Compliance (see following points). The integrity profile of business partners in particular serves as a key basis for this.
- Taking responsibility means taking action. We influence our business partners in the event of violations or insufficient information so that they can prevent or minimize them in the future.
- We automatically monitor agreed action plans, evaluate their effectiveness and impose sanctions in the event of non-compliance or violations.

## **b. Business Partner Compliance**

EVVA checks compliance with the principles of conduct defined in this CoC by means of EVVA Business Partner Compliance (see the following points for details) in order to identify legal, economic, social and ecological events with risk potential that are relevant for business partners and EVVA. Business partners provide us with information about their measures, regularly maintain their entries, complete their documentation and are available for queries.

Occupational safety, compliance, corruption, human rights, business partner check and environment are selected as the categories under review. The categories can be adapted by EVVA if necessary.

The positive status that we collect and that our business partners assure us of is the basis for any cooperation. Our business partners themselves assess the compliance status in their value chain and ensure a high minimum status in terms of integrity and responsible and sustainable entrepreneurship when selecting their business partners.

## **c. Risk management along the value chain**

EVVA focuses on risk analysis with the help of our EVVA Business Partner Compliance in order to systematically record and evaluate risks along the value chain. We concentrate here on so-called "established business relationships". This includes contractual relationships

- which are expected to be stable due to their intensity and duration (observation period of approx. 12 months).
  - Which contractual relationships have existed for more than 12 months?
  - Which contractual relationships will still be in place in 12 months' time?
  - Will new contractual relationships still be in place or essential in 12 months' time?
- that represent a significant (at least not a subordinate) part of the value chain.
  - With business partners from whom we acquire the resources for our products, key purchased components, important services, etc, important services, etc.
  - With contractual partners who – in terms of the turnover they generate – represent a significant part of our value chain
- who are considered critical or risky due to certain circumstances; e.g. single-source suppliers; critical product groups (iron and steel, metals, conflict materials, mercury, chemicals, plastics, etc.)
- that affect sectors/industries with a high risk potential.
  - Automotive, chemicals, electronics, telecommunications & digital, energy supply, financial services, wholesale and retail, metal industry, mechanical engineering, food & beverages, textiles & leather as well as tourism & leisure
- where there is a higher probability of violations due to local conditions, i.e. product-, industry- and country-specific risks in our established business relationships

The above selection criteria are regularly evaluated and adjusted if necessary. Selected business partners are requested to create an integrity profile directly in the EVVA Business Partner Compliance Tool or to update the existing profile. Subsequently, the business partners must answer the predefined questions on the topics of human rights, occupational safety, compliance, corruption, dealing with business partners and the environment. The questions are based on the requirements of ISO 26000 and are oriented towards internationally recognized best practice assessments. The identified risks are evaluated according to a predefined scoring system in the form of a traffic light system. An integrity status of the color "green" automatically leads to a "release" of the business partner. If the traffic light shows "yellow", the status is unclear. If the traffic light shows "red", the business partner receives the status "rejected". In the event of both "yellow" and "red", specific (corrective) measures must be agreed between EVVA and the business partner.

## **d. Risk due diligence**

Appropriate preventive and, if necessary, remedial measures must be taken in accordance with the level of the identified risks. The affected business partners are required to provide a corresponding action plan in the EVVA Business Partner Compliance system, to document it and, if necessary, to coordinate it with EVVA. In addition to individual measures, the action plan names the respective responsible parties and defines precise implementation schedules.

The responsible Compliance Officer at EVVA checks the submitted action plan, coordinates it with Purchasing and Quality Management and submits it to the management for approval. After internal evaluation, the action plan is accepted or rejected by the Compliance Officer with reasons. Approval may also be granted subject to improvement or implementation of the action plan.

#### **e. Evaluation of the effectiveness of measures**

In the event that measures to reduce or avoid negative impacts are agreed with affected business partners (by means of a corrective action plan), an updated status must be collected and evaluated after a period of time (12 months or less) from the date of issue. The assessment includes whether the agreed measures have been implemented and whether negative impacts of the originally identified risks can be prevented or at least further minimized. The result of the assessment serves as the basis for further action.

#### **f. Remedial actions & sanctions**

If the requirements listed in this CoC are violated or a measure is not complied with, EVVA has the right to sanction business partners. It is at EVVA's discretion to assess the extent of a violation and the associated sanctions. Taking into account the identified risks, existing requirements and the severity of the violation, the sanctioning measures include the imposition of additional requirements, a shortening of the control intervals, the temporary suspension of the supply relationship and/or the extraordinary termination of contractual relationships and notification to the competent authority. Our business partners shall indemnify and hold EVVA harmless in connection with third-party claims arising from violations of our principles.

### **2. ENVIRONMENTAL PROTECTION & SUSTAINABILITY**

For our family-owned company EVVA, acting in an ecologically responsible manner is part of our philosophy of life. Integrity is an indispensable value for our sustainability strategy. We see it as our clear responsibility to create a stable, future-proof environment for our employees and business partners, to be a reliable partner and to make a contribution to a more peaceful and environmentally conscious society.

EVVA also expects its business partners to have a sense of ecological responsibility. Compliance with all environmentally relevant laws is a matter of course.

In the area of environmental policy, our primary goal is to measure and continuously improve our environmental performance. Both EVVA and our business partners are responsible for using raw materials and energy sparingly, complying with legal limits for climate-unfriendly emissions and initiating the necessary countermeasures in the event of violations. Waste is to be avoided as far as possible and regarded as recyclable materials. Hazardous materials, chemicals and substances must be labeled and their safe handling ensured. The use of substances and materials that are hazardous to the environment and health must be avoided.

Link to the EVVA sustainability report: [www.evva.com/nachhaltigkeit](http://www.evva.com/nachhaltigkeit) or [www.evva.com/sustainability](http://www.evva.com/sustainability)

### **3. HUMAN RIGHTS AND DIVERSITY**

As an internationally active, value-oriented family business, respect for human rights is an indispensable part of our corporate responsibility. We have been aware of this for generations and respect the opinions of others and their personal dignity, privacy and personal rights. At EVVA, we do not tolerate discrimination or harassment of any kind, e.g. based on nationality, culture, religion, skin color, gender, sexual or political orientation, age or disability.

Diversity and inclusion among employees and a culture of equal opportunities are the basis for EVVA's success and an important driver of innovation and creativity within the company. EVVA is convinced that the different backgrounds and experiences of our employees and the appreciation of their individual differences are an enrichment for our company.

Key aspects for the implementation of diversity, inclusion and equal opportunities include creating transparency, taking into account the specific needs of younger generations, the growing number of older employees and the requirements for mobile working and work-life balance.

Our business partners respect internationally recognized human rights and ensure that these are upheld, and comply with fundamental human and employee rights, in particular the prohibition of slavery and child and forced labour, on the basis of the applicable national and international laws and regulations.

Please read our EVVA Human Rights Policy and our EVVA Diversity Policy at [www.evva.com/int-en/aboutus/company](http://www.evva.com/int-en/aboutus/company)

#### **4. FAIR WORKING CONDITIONS / SAFETY IN THE WORKPLACE**

We take our social responsibility towards our employees seriously and naturally comply with all occupational health and safety laws and the required training (e.g. for the operation of machines). However, the company goes many steps further to better identify sources of danger and derive preventative measures.

We respect all applicable social and ethical obligations and are guided by the principles of the Universal Declaration of Human Rights (UDHR; [www.un.org/en/documents/udhr](http://www.un.org/en/documents/udhr)), the [United Nations Global Compact](#), the [OECD Guidelines for Multi-national Enterprises](#) and the [Declaration on Fundamental Principles and Rights at Work](#) of the International Labor Organization (ILO). A violation of these principles, in particular the prohibition of slavery, forced and child labor, will not be tolerated under any circumstances.

Our business partners grant their employees the legally and contractually agreed requirements for health and safety in the workplace, comply with the relevant national working time laws and pay appropriate and legally compliant wages.

We expect our business partners to give their employees the opportunity to peacefully assemble and join forces. This also includes the right, where provided for by law, to form trade unions and conduct collective bargaining to protect their interests.

#### **5. DATA PROTECTION**

EVVA is aware of the importance of data protection. Every person has the right to determine the whereabouts of their own data. EVVA respects the privacy of every person and guarantees the best possible data protection, as misuse can lead to serious consequences for us as a company and for our business partners and customers. We also expect our business partners to handle personal data confidentially and to comply with the applicable laws and official regulations on data protection and information security.

#### **6. FAIR COMPETITION / ANTITRUST LAW**

EVVA is clearly committed to the principles of free competition. Any activities that are likely to restrict or prevent competition are not permitted. This includes the improper exchange of competitive information as well as price fixing or abusive market dominance. No unfair business practices may be used or pressure exerted on intermediaries to sell products at a certain price.

Our business partners respect fair and free competition and comply with the applicable competition and antitrust laws.

#### **7. ANTI-CORRUPTION AND CONFLICTS OF INTEREST**

EVVA refuses to grant and accept concessions and benefits of any kind if they violate legal provisions, are inappropriate or immoral, in particular if they are intended to influence business transactions in an inadmissible manner or could even create such an impression. Offering or accepting money or non-cash benefits is not permitted. Gifts to public officials that exceed the respective country-specific limits are not permitted.

We deal with conflicts of interest in connection with personal matters or other business or non-business activities, including those of relatives or other related parties, in a professional, transparent and comprehensible manner.

Our business partners undertake to conduct their business decisions ethically and without corruption or any kind of fraudulent business practices and not to allow themselves to be influenced by personal relationships or other private interests.

#### **8. COMPLIANCE WITH EXPORT CONTROL LAW**

With regard to their deliveries and services, our business partners shall comply with the applicable provisions of national and international export control law. They ensure that business activities comply with existing sanctions and embargoes within the framework of laws and regulations.

## **9. PROTECTION OF INTELLECTUAL PROPERTY**

EVVA undertakes to protect intellectual property of any kind and to keep confidential information secret. We also expect our business partners to respect the intellectual property of their competitors, customers and other business partners along the entire value and supply chain and to treat third-party company property as well as business and trade secrets in a legally compliant and respectful manner.

## **10. PROTECTION OF WHISTLEBLOWERS / COMPLAINTS PROCEDURE**

EVVA takes complaints about grievances within the company seriously and protects whistleblowers. We expect our business partners to allow their employees to speak out freely and without fear of retaliation if the content defined in this CoC/Code of Conduct is violated. Our business partners should ensure that effective and confidential grievance mechanisms are in place at company level throughout the supply and production chain for individuals and associations who become aware of violations of the obligations set out in this CoC.

EVVA will take appropriate remedial action if we become aware of negative impacts with regard to human rights and the environment as well as other white-collar criminal behavior. A breach of the contents of this CoC may give EVVA cause to initiate training, warnings, audits, contract terminations, reports to authorities and other legal action.

**We thank you very much for your binding compliance with our Code of Conduct.**

**Here's to our long-term, successful and respectful cooperation!**