



VINCORION®

Code of Conduct for Suppliers of the VINCORION Group

Corporate responsibility is a fundamental element of VINCORION's commercial success.

In addition to upholding high legal and ethical standards when dealing with its own employees, business partners, and other company stakeholders, this also includes sustainable management to promote the company's social responsibility.

VINCORION expects its suppliers and other contractors (hereinafter "suppliers") to uphold the same legal and ethical standards.

This Code of Conduct defines the VINCORION Group's requirements for its suppliers with regard to compliance with national and international laws, regulations, and standards.

It applies to all suppliers of goods and services of VINCORION Advanced Systems GmbH and its affiliated companies (as defined by Article 15 of the Stock Corporation Act (AktG)) (hereinafter "VINCORION").

The supplier shall undertake to comply with the following principles.

1. Compliance with laws and regulations

The supplier warrants that it complies with all relevant national and international laws in and in connection with the provision of services for VINCORION, and that it takes steps to keep itself regularly informed of any changes to these laws.

This applies, in particular, to the laws of the country in which services are provided and in which the supplier has its registered office.

2. Observance and guarantee of human rights

The supplier warrants that it complies with internationally recognized human rights standards and does not tolerate any infringement of these standards by third parties.

2.1 Prohibition of forced and child labor

The supplier does not tolerate any form of forced labor, slavery, human trafficking, or other exploitation of employees, or any form of child labor.

2.2 Prohibition of discrimination and unequal treatment

The supplier does not accept any form of discrimination, unfavorable, or unequal treatment, for example based on race, ethnic or national origin, skin color, gender, religion or belief, political affiliation, disability, age, marital status, sexual identity, or other personal traits. It respects the privacy and personal rights of its employees.

2.3 Assurance of fair working conditions and hours

The supplier ensures fair working conditions and complies with all applicable health and safety regulations. In particular, it warrants that it complies with all statutory regulations relating to working hours.

2.4 Assurance of fair pay

The supplier ensures fair pay for its personnel. It warrants that it complies with all statutory minimum wage provisions applicable in its provision of services for VINCORION, including relevant documentation and retention obligations.

2.5 Respect for freedom of association and right to organize

The supplier warrants that it respects its employees' freedom of association and right to organize in accordance with the relevant laws and provisions.

3. Prohibition of corruption and bribery

The supplier does not tolerate bribery, corruption, or other corrupt conduct. In and in connection with the provision of services for VINCORION, it complies with all relevant national and international anti-corruption legislation (e.g. UK Bribery Act, Foreign Corrupt Practices Act).

The supplier warrants that it has not and will not provide any unlawful benefits, either directly or indirectly, to managers, employees, or representatives of VINCORION. The supplier further warrants that it does not offer, promise, or grant unlawful payments, donations, gifts, or other assets to public officials, other private or public decision-makers, or other business partners, either

directly or indirectly, in and in connection with the provision of services for VINCORION, and does not seek to exercise any unlawful influence on their decision-making. In its business relationship with VINCORION, the supplier will also neither demand, accept, nor tolerate the promise of any unlawful benefits from third parties.

4. Avoidance of conflicts of interest

The supplier warrants that it has no personal, business, or legal conflicts of interest in and in connection with the provision of services for VINCORION. It will also undertake to provide immediate notification of potential conflicts of interest (including those of its employees and agents), in particular those relating to personal relationships with VINCORION employees or business partners.

5. Fair conduct in the marketplace and fair competitive practices

VINCORION expects its suppliers to engage in market and competitive practices that are fair, ethically responsible, and law-abiding.

5.1 Prohibition of antitrust practices

The sales partner warrants that it refrains from antitrust and anticompetitive agreements in and in connection with the provision of services for VINCORION, this to include impermissible price, territorial, market-sharing, and collusive bidding agreements, and that it complies with the regulations of the relevant antitrust laws.

5.2 Protection of information

The supplier ensures the protection of confidential information that becomes known to it in the process of providing services for VINCORION, as well as other trade and business secrets, and complies with the relevant laws relating to the protection of intellectual property.

Confidential information and documents may only be used for the purposes agreed in the respective business relationship and may not be passed on or otherwise made accessible to third parties without authorization.

The supplier also undertakes to comply with the applicable national and international data protection laws.

5.3 Compliance with foreign trade law provisions

If applicable within the scope of providing services VINCORION, the supplier warrants that it complies with all relevant national and international foreign trade law and customs provisions, such as the relevant laws on importing and exporting goods, services, technologies, software, and information, and on embargoes and other sanctions.

In particular, it undertakes to comply with all relevant provisions of national and international customs and foreign trade law, and provide in good time and in writing all papers, documents, data, and information required for compliance of the relevant customs and foreign trade laws on export, import, and re-export (e.g. official permits to be obtained or existing obligations to register).

6. Commitment to the environment

6.1 Protection of the environment and resources

The supplier warrants that it complies with all relevant national and international environmental protection regulations in and in connection with the provision of services for VINCORION and is committed to the responsible use and procurement of natural resources. In particular, it ensures the establishment of an appropriate environmental management system.

6.2 Assurance of product safety and compliance with requirements relating to the handling of substances, mixtures and articles

The supplier undertakes to ensure that all goods and services it supplies comply with the quality or safety standards specified by the relevant laws and regulations, and will demonstrate this at VINCORION's request.

The supplier further undertakes, if applicable, to ensure careful and responsible handling of substances, mixtures, and articles in and in connection with the provision of services for VINCORION in accordance with the relevant national and international requirements.

In particular, the supplier warrants that, if applicable, it complies with all relevant registration and information obligations and the restrictions of the REACH Regulation (EC) 1907/2006 for substances and mixtures, and provides a material safety data sheet for substances and mixtures used. It further undertakes to comply with the restrictions on the use of certain hazardous substances in accordance with the RoHS Directive 2011/65/EU.

7. Responsible use of conflict minerals

The supplier must ensure that "conflict minerals" (tin, tantalum, tungsten, and gold) and their derivatives are only used in supplies to VINCORION in compliance with the relevant statutory regulations. It must ensure this, in particular, by means of sufficient transparency and reviews of the supply chain (e.g. OECD due diligence proof of execution) and demonstrate it to VINCORION upon request.

8. Communication of the principles in this Code of Conduct to third parties

The supplier undertakes to communicate to and bind its employees, legal representatives, agents, and other third parties involved in and in connection with the provision of services of VINCORION to the principles set out above. At VINCORION's request, it will demonstrate this to VINCORION in the event that reasonable grounds to do so exist.

9. Consequences of infringements

The supplier is obliged to notify VINCORION without delay if it suspects an infringement of the obligations set out in this Code of Conduct in connection with the provision of services for VINCORION and to support VINCORION in resolving any such cases.

Any suspicions can be communicated to its contact at VINCORION or employees in VINCORION-Corporate Governance, Compliance & Risk Management.

The supplier also gives its employees the opportunity to report infringements in confidence.

In the event of serious infringements of this Code of Conduct, VINCORION is authorized, in particular, to immediately end all contractual relations with the contracting party and terminate them without notice. In all cases, the supplier is obliged to remedy any infringements without delay.

VINCORION reserves the express right to claim damages from the supplier in the event of an infringement of this Code of Conduct for which the supplier is responsible.

The supplier exempts VINCORION from all claims made by third parties based on infringements of this Code of Conduct for which the supplier is responsible in the provision of services for VINCORION.

10. Final Provisions

This Code of Conduct is subject to the laws in effect at the registered office of the VINCORION company responsible for concluding the contract.

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The content of this publication address all genders equally. For better readability, the masculine forms are used normally.