

# Suppliers' Code of Conduct

(as of September 1st, 2023)

## 1. Introduction

As a value-oriented company, nicos AG has committed itself to certain basic values, of which sustainability is one of the cornerstones.

Since the mid-2020, a comprehensive corporate responsibility strategy has therefore been part of nicos AG'S corporate strategy. Since then, the company's actions with regard to the environment, social issues and society per se, have been consciously realigned in a sustainable manner. Part of this new strategy is also the review of all corporate aspects and the creation of transparency. Since 2021, the voluntary preparation and publication of a sustainability report has also served this purpose. In this report, we disclose the status quo with key figures and statistics and show which measures have already been taken or are planned. From 2023, we will prepare these reports according to the strict guidelines of the Economy for the Common Good (ECG).

nicos AG is a company that operates globally in a wide range of countries and cultures. This Supplier's declaration therefore applies worldwide, taking into account different cultures. nicos AG pursues a "zero tolerance" strategy in connection with unethical business behaviour such as child labour, corrupt business behaviour and the like. We place great emphasis on integrity in business transactions and expect suppliers and service providers (hereinafter collectively referred to as "Supplier") to conduct their business using comparable standards and benchmarks. Together with you as our suppliers, we want to move ever closer to the goal of a more sustainable environment and social society, and we thank you very much for your commitment and dedication.

## 2. Compliance

The „Supplier“ shall comply with the applicable laws in its business activities worldwide. It shall ensure compliance with appropriate measures in relation to the risks of its business activity and its size.

## 3. Human Rights

As „Supplier“ of nicos AG, you undertake in your business activities in all countries to:

- a) respect the personal dignity, privacy and rights of the individual;
- b) refrain from work which is the consequence of the exercise of any form of coercion (prohibition of forced or compulsory labour);
- c) refrain from any employment of children below the local legal minimum employment age;
- d) refrain from any form of discriminatory behaviour with regard to physical appearance, ethnic origin, gender and sexual orientation, religion, belief, ideology, disability, age, trade union membership, etc;
- e) not tolerate any kind of sexual harassment.

## 4. Working Conditions

As nicos AG „Supplier“, you ensure fair working conditions and health and safety in the workplace within the framework of the applicable laws. This includes, among other things:

- a) fair remuneration and compensation with regulated working hours taking into account the respective legal provisions (in particular that the regulations on the minimum wage are observed);
- b) a working climate that enables workers to raise their concerns about the employment relationship individually or collectively within the framework of the applicable legislation on collective representation and trade union membership and without fear of discrimination, in whatever shape;
- c) appropriate organisational and other measures as part of the management of safety and health risks in the workplace, in any case at least in compliance with the legal requirements applicable to the workplaces in each case;
- d) ensuring that workers are aware of the risks in the workplace and have been adequately trained to prevent them.

## 5. Environmental Standards

The „Supplier“ undertakes to do everything in its power to achieve the highest possible environmental standards that currently exist in the respective industry (such as "The Blue Angel" for paper products).

As „Supplier“ of nicos AG, you further commit yourself to a careful and sustainable use of natural resources and act precautionary in the sense of increased responsibility of the company for the environment and the promotion and use of environmentally friendly, especially energy- and water-saving technologies.

In addition, the „Supplier“ will ensure that measures are taken to avoid waste (e.g. through recycling systems and the reparability of products) as well as measures that reduce CO<sub>2</sub> emissions, for example through the use of green electricity or, if a further reduction is not possible, reasonable compensation measures. (e.g. via [www.fortomorrow.eu](http://www.fortomorrow.eu)).

We prefer suppliers who disclose their actions with regard to their corporate responsibility strategy in a sustainability report based on figures, data and facts.

## 6. Material Compliance

The purpose of material compliance is to ensure the safe handling of substances and products used in the „Supplier's“ products. The material compliance requirements are equivalent to other material or product requirements. The material compliance standard is a legal requirement (e.g. REACH, RoHS etc.). The „Supplier“ is obliged to obtain the respective current guidelines, laws and standards himself. It is the „Supplier's“ duty of care not to sell products with prohibited substances, or to observe and point out corresponding restrictions. Products of unknown origin and/or composition may generally not be offered for sale.

## 7. Conflict Minerals

The „Supplier“ undertakes to do everything in its power to prevent the use of so-called conflict minerals. This applies in particular to raw materials such as columbite-tantalite (coltan, niobium, tantalum), cassiterite (tin), gold, wolframite (tungsten) from the DR Congo and its neighbouring states. The basis for this is Section 1502 of the US Dodd-Frank Act of 2010, Regulation (EU) 2017/821 of 17 May 2017, the EU Conflict Minerals Regulation of 1 January 2021, and comparable national and international – as well as more current legal obligations. You also undertake to refrain from any purchase of materials from illegal sources.

## 8. Business Ethics

a) Corruption: As a „Supplier“ of nicos AG you comply with all applicable national and international anti-corruption laws and regulations. You consistently reject any form of bribery, unlawful acceptance or granting of advantages in your business activities. By taking appropriate measures in your company, you ensure that your employees and business partners are aware of and comply with the rules that apply in connection with corruption.

b) Free Competition: As „Supplier“ of nicos AG, you refrain at all times from any anti-competitive behaviour such as price agreements, splitting of market segments, price fixing etc. in the interest of free competition.

c) Money Laundering: You comply with applicable money laundering laws and regulations.

d) Further: You disclose potential conflicts of interest in connection with the business activities of nicos AG without being asked to do so. You are concerned about protecting the business secrets of nicos AG and its business partners. Likewise, you respect the property rights of others. As „Supplier“ of nicos AG, you comply with the applicable data protection regulations.

## 9. Final Clause:

a) For its part, a „Supplier“ undertakes to pass on analogous principles to its own suppliers and service providers.

b) nicos AG reserves the right to verify compliance with this supplier's declaration by taking appropriate measures.

c) This „Supplier“ Declaration on Sustainability and Compliance shall be valid as long as the business relationship between nicos AG and „Supplier“ exists.