Supplier Code of Conduct of the Sandler Group

Preamble

The Sandler Group is committed to its social and ecological responsibility. It is our aim to respond to requirements of the market while treating people and nature responsibly. This applies both to our environment and to our entire value chain.

We ask our business partners to respect the following principles, to establish them in a comparable form in their own enterprise, and to pass them on in their value chains.

Our Code of Conduct is based on national laws and regulations as well as international treaties like the United Nations Human Rights Charter, the United Nations Convention on the Rights of the Child, the OECD Guidelines, or the labor standards of the International Labor Organization (ILO).

People in the workplace

For the Sandler Group, the protection of people in the workplace is a top priority. Everyone has the right to personal safety, health, and safe and healthy working conditions.

This is also embedded in the Sandler Group´s Policy Statement on Human Rights.

Ban on child labor
Child labor must not be used in any phase of business activities. We expect a zero-tolerance policy from our business partners. We require them to comply with the minimum age and the special protection of minors in accordance with ILO standards.

Ban on forced labor, slavery and human trafficking
We strictly reject forced labor, slavery, and human trafficking. Any labor must be carried out voluntarily and without the threat of punishment or the use of force (not even by authorized security forces). In this regard, we likewise expect a zero-tolerance policy from our business partners. Employees must be able to terminate their employment on their own accord in accordance with legal requirements.

Non-discrimination policy
We reject any kind of discrimination. This is true for discrimination on the basis of race, color, religion, sex (including pregnancy, sexual orientation, or gender orientation, national and social origin, disability, age or genetic information (including family medical history). The personal dignity, privacy and personal rights of each individual are respected.

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Fair working hours & fair pay
Working hours must comply with federal and local laws.
All employees must be paid adequate remuneration, but no less than the statutory minimum wage required by local law. If no statutory minimum wage is in place in a particular country, wages must be sufficient for the employees and their families to make a living. The principle of equal treatment for the people in equal work applies to remuneration.

Workplace safety
We ask our business partners to create a safe and healthy work environment for their employees. For this purpose, adequate measures must be taken to provide safety and health protection measures, training, adequate breaks, access to drinking water, and sanitary facilities.

Freedom of association
The fundamental right of all employees to form and join employee representations is recognized. Where this right is restricted by local laws, alternative, legally compliant options for employee representation shall be promoted.

Sustainability

The Sandler Group is committed to protect a sustainable value chain.

Handling of emissions
We encourage our business partners to frequently collect their emission data as well as to continuously reduce them with the aim of zero emissions. Local laws must be adhered to.

Handling of raw materials
We expect our business partners to handle raw materials responsibly, including efforts to identify and use alternative, more efficient materials. Waste must be reduced or avoided. Unavoidable waste needs to be recycled or disposed of in a regulated manner. This applies particularly to hazardous waste that must not enter the environment (e.g., mercury waste according to the Minamata Convention, or persistent organic pollutants (POPs) according to the Stockholm Convention). Regarding transboundary movement of hazardous waste, we expect our business partners to comply with the Basle Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal.

Sustainability

The Sandler Group is committed to protect a sustainable value chain.

Handling of resources

We encourage require our business partners to responsibly use energy, to ideally use renewable energy, and to carefully use and handle water and wastewater. Ecologically and economically viable solutions are encouraged to improve energy efficiency and minimize the consumption of energy and water. Wastewater must be treated or discharged properly.

Preservation of natural resources

Business partners must not deprive people of land, forests, or water. Instead, Sandler Group encourages the preservation of resources that provide security and protect legitimate human rights. Harmful changes to the soil, contamination of water and air, the emission of noise, and the excessive use of water must be avoided. Company activities must not damage the health of persons, impair the natural basis for production of food, or prevent people from accessing safe drinking water and sanitary facilities.

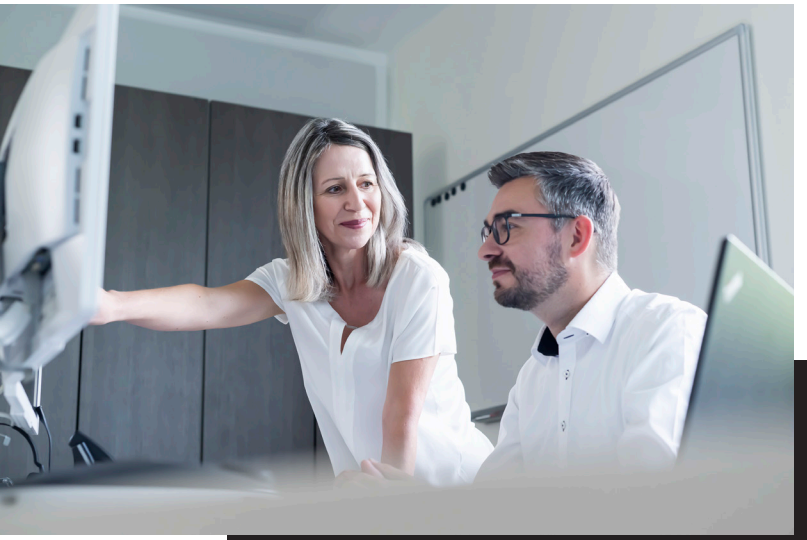
Ethical business conduct

The Sandler Group is committed to free and fair competition and compliance with applicable law. We expect the same from our business partners.

Free and fair competition
Competition must be free and undistorted. We require our business partners to comply with applicable antitrust laws. Violation of antitrust law contradicts our understanding of fair competition.

Ban on corruption
We dissociate ourselves from corruption and bribery and expect legally and ethically impeccable conduct from our business partners. Influences that jeopardize this policy are deemed unacceptable. Our employees are prohibited from accepting gifts or noncash benefits. Occasional invitations to business meals are permitted, provided they do not exceed a reasonable scope and are not intended to influence business decisions, as outlined in the internal Sandler Business Gifts and Entertainment policy.

Customs and export control regulations
We require our business partners to observe applicable regulations concerning the import and export of goods, services, and information.



Data protection and data security

Data is a highly sensitive commodity. For this reason, a responsible and secure handling of data is paramount for the Sandler Group.

Data protection
We expect our business partners to apply appropriate measures and processes to ensure that personal data are being handled and protected in accordance with current law.

Data security and protection of business secrets
Sandler Group has appropriate technical and organizational measures, as well as non-disclosure agreements in place, to protect sensitive information and data. We expect our business partners to implement appropriate measures (training, sensitization of employees, processes) to ensure Sandler data remains secure. IT systems must be secured in accordance with state of the art. We explicitly recommend an ISO 27001 certification. In case of security breaches, expedited remedial actions are required, and interested business partners must be immediately informed.

Product safety and quality assurance

Sandler Group stands for highest quality and product safety. We expect the same from our business partners.

Product safety
Safety and conformity of our products are top priorities for the Sandler Group. We observe the legal and technical requirements and standards concerning product safety and conformity throughout all phases of value creation. Our business partners commit themselves to producing and supplying us with impeccable products in accordance with our requirements and specifications. In case of security concerns, they immediately inform us of potential hazards and take suitable action to reduce risk.

Quality assurance
In development and production, we work according to the highest quality principles, in accordance with legal requirements and technical regulations. We continuously observe approval requirements for the design, examination, use, and disposal of products. We expect our business partners to work in the same way.

Complaint procedures

It is important to us to offer people who are affected by our daily activities a safe and confidential opportunity to raise concerns. This helps us to continuously drive improvements and fulfill our due diligence obligations.

Our business partners must provide their respective employees with information received from Sandler Group regarding accessibility, responsibility, and the implementation of a complaint procedure. The complaints procedure must be accessible to employees while maintaining confidentiality, identity, and protection against discrimination. In the absence of notice, the business partner is responsible for establishing an effective complaint mechanism at company level for individuals and communities that may be affected by adverse impacts.

Implementations and requirements

We expect our business partners to identify risks in the supply chain and take appropriate measures to mitigate potential negative impacts.

Sandler Group will verify compliance with the standards and regulations set forth in this document by means of self-assessment questionnaires and prioritized, risk-based audits. Audits will be announced and coordinated with the respective business partner.

In case a violation of this code of conduct is detected, Sandler Group will immediately inform the respective business partners in writing. If misconduct is confirmed, a deadline for remediation will be communicated. If a remedy is not possible within a reasonable amount of time, we expect the business partner to notify us immediately, develop an action plan, and cooperate with Sandler Group to identify an appropriate timeline for remedy. Sandler Group has the right to terminate the business relationship and all contracts if the deadline expires without result, or the implementation of the agreed measures does not remedy the problem... If a serious breach occurs, the statutory right to extraordinary, immediate contract termination remains unaffected, as does the right to compensation.

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Acknowledgement and consent of the business partner

In signing this document, the business partner commits to act responsibly and observe the principles and requirements set forth herein. The business partner agrees to effectively communicate and implement these principles and requirements in his/her company and supply chain.

Company

Name, Function / Date, Signature (Digital signature is accepted)