


## Table of contents

1.	Foreword .....	2
2.	Compliance with laws and regulations .....	3
2.1	Applicable law .....	3
2.2	Compliance and integrity .....	3
2.3	Fair competition .....	3
2.4	Money laundering .....	3
2.5	Intellectual property .....	3
2.6	Data protection and information security .....	3
3.	Social and working conditions .....	4
3.1	Free choice of employment .....	4
3.2	Prohibition of child labor .....	4
3.3	Wages, remuneration and benefits .....	4
3.4	Working hours .....	4
3.5	No discrimination .....	4
3.6	Freedom of association and the right to collective action .....	4
3.7	Health and safety .....	5
3.8	Working conditions .....	5
4.	Ecological sustainability .....	5
4.1	Environmental permits .....	5
4.2	Resource consumption, avoidance of environmental pollution and waste minimization .....	5
4.3	Product safety and hazardous substance management .....	5
4.4	Material compliance and conflict materials .....	5
5.	Final provisions .....	6
5.1	Conduct in the event of violations .....	6
5.2	Whistleblowing - protection of whistleblowers .....	6
5.3	Record-keeping obligations, quality management .....	6
5.4	Supplier audits .....	6
5.5	Consent .....	6

	<b>Supplier guideline</b>	
	<b>A-01.10</b> Version/status: 01/02.10.2023	Creator: MB Page 2 from 6

## 1. Foreword

We firmly believe that only a company founded on values can guarantee sustainable growth and find solutions to the challenges of the future. Being committed to these values means taking responsibility: for customers, society, protecting the environment and for employees and their families.

**pfenning logistics GmbH is committed** to ethical, lawful and socially responsible corporate governance and expects the same behavior from all those with whom we conduct business relationships. As part of our commitment to uphold the values defined in **pfenning logistics GmbH's** sustainability strategy, we expect our suppliers to conduct themselves in accordance with comparable standards. Our expectations are formulated in this Code of Conduct for Suppliers, which you as a supplier undertake to comply with.

This Supplier Code of Conduct describes the key requirements that our suppliers must meet with regard to compliance with laws and regulations, corruption and bribery, social and working conditions, child labor and the environment. We expect our suppliers to share this commitment and to make reasonable efforts to promote compliance with the principles of this Code among their own suppliers and subcontractors.


Thank you for your support! Heddesheim, 02.10.2023

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Rana Matthias  
Management Board

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NagManuel Pfenning  
Management

	<b>Supplier guideline</b>	
	<b>A-01.10</b> Version/status: 01/02.10.2023	Creator: MB Page 3 from 6

## 2. Compliance with laws and regulations

### 2.1 Applicable law

**pfenning logistics GmbH** expects its suppliers and their suppliers and subcontractors to comply with applicable national and international laws and regulations, including the International Labor Convention and the United Nations Universal Declaration of Human Rights, industry standards and all other relevant legal provisions. Should legal provisions or other rules apply in individual countries in which the supplier operates that deviate from the requirements of the Code, the stricter requirements in each case must be complied with.

### 2.2 Compliance and integrity

**pfenning logistics GmbH** expects its suppliers to comply with all applicable laws and regulations regarding corruption, bribery, fraud and prohibited business practices.

The Supplier shall ensure that its employees and subcontractors do not offer, promise or grant any benefits to **pfenning logistics GmbH** employees that are intended to obtain an order or other preferential treatment in business or private dealings.

Invitations and gifts to **pfenning logistics GmbH** employees or their related parties are only granted if they are of insignificant financial value and in line with customary business practices.

### 2.3 Fair competition

**pfenning logistics GmbH** expects its suppliers to behave fairly in competition and to observe the applicable antitrust laws. The supplier shall neither participate in agreements with competitors that violate antitrust law nor abuse any dominant market position that may exist.

### 2.4 Money laundering


The supplier does not participate in money laundering activities and complies with the relevant legal obligations to prevent money laundering.

### 2.5 Intellectual property

The supplier shall handle business correspondence in a confidential manner. Confidential information, any kind of data worthy of protection and the intellectual property rights of **pfenning logistics GmbH** shall be properly secured in accordance with the respective legal requirements.

### 2.6 Data protection and information security

The Supplier shall instruct all its employees in accordance with the applicable data protection regulations and in information security-related topics. In addition, its employees shall be obliged to maintain data secrecy and confidentiality. These declarations must be presented to the data protection officer or authorized person of **pfenning logistics GmbH** upon request. In the event of termination of the business relationship, the supplier undertakes to return any documents provided upon request.

	<b>Supplier guideline</b>	
	<b>A-01.10</b> Version/status: 01/02.10.2023	Creator: MB Page 4 from 6

### **3. Social and working conditions**

**pfenning logistics GmbH** expects its suppliers to recognize the basic rights of their employees and to undertake to comply with them and to treat employees with dignity and respect in accordance with the understanding of the international community. In particular, suppliers shall comply with the following provisions

#### **3.1 Free choice of employment**

All employment is voluntary. Forced labor, forced prison labor, indentured labor, modern slavery or human trafficking is strictly prohibited.

#### **3.2 Ban on child labor**

We condemn any form of exploitation of children. Our suppliers undertake not to employ children who have not yet reached the required legal minimum age. Every child must be protected from economic exploitation and from having to carry out work that is classified as dangerous, has a negative impact on the child's education or impairs the child's healthy development.

The use of child labor is strictly prohibited in accordance with the provisions of the ILO, the United Nations Convention and / or national laws. Of these various laws, the one that imposes the strictest requirements must be applied.

#### **3.3 Wages, remuneration and benefits**

All applicable laws, regulations and industry standards on compensation and benefits must be complied with. Deductions from benefits as a disciplinary measure are not permitted. Likewise, deductions from benefits that are not provided for by national law are not permitted without the express consent of the employee concerned.

Wages, benefits and compensation for overtime must at least meet the requirements of national legal provisions and agreements. The supplier shall grant the legally prescribed benefits such as compliance with the minimum or collectively agreed wage, continued payment on public holidays, paid annual leave, sick leave and parental leave. Disciplinary measures in the form of salary deductions are not permitted.

#### **3.4 Working hours**


All applicable laws, regulations and industry standards on working hours must be complied with. Overtime may only be worked voluntarily and must be remunerated in accordance with the applicable legal provisions. Employees must be granted a rest period in accordance with the mandatory local legal provisions.

#### **3.5 No discrimination**

Supplier shall comply with all applicable laws prohibiting discrimination in hiring and employment based on race, color, national origin, culture, religion, disability, physical condition, sexual orientation, medical condition, political affiliation, sex, age, appearance, membership in associations, parenthood or any other characteristic protected by law.

#### **3.6 Freedom of association and the right to collective action**

The supplier recognizes the right to freedom of association and collective bargaining within the legally permissible framework.

	<b>Supplier guideline</b>	
	<b>A-01.10</b> Version/status: 01/02.10.2023	Creator: MB Page 5 of 6

### 3.7 Health and safety

The supplier must provide its employees with safe and healthy workplaces in compliance with all applicable laws, regulations and industry standards. Harassment in the workplace will not be tolerated. Supplier shall comply with all applicable health and safety regulations.

### 3.8 Working conditions

The supplier must provide its employees with appropriate working facilities. As a minimum, access to drinking water and sanitary facilities must be ensured and care must be taken to ensure fire safety, access to emergency medical care, adequate lighting and ventilation.

## 4. Ecological sustainability

**pfenning logistics GmbH** expects its suppliers to comply with all applicable laws and regulations as well as internationally recognized standards for the protection of the environment. This applies in particular to the aspects of energy efficiency and renewable energies, water quality and consumption, air quality, management of sustainable resources, waste reduction and responsible chemical handling.

### 4.1 Environmental permits

The Supplier shall ensure that all necessary environmental permits and approvals are obtained, kept up to date and complied with in order to act in accordance with the law at all times.

### 4.2 Resource consumption, avoidance of environmental pollution and waste minimization


The supplier undertakes to optimize the consumption of natural resources, including energy and water. Sound measures will be taken to prevent pollution and minimize the generation of waste, wastewater and air and greenhouse gas emissions. Wastewater and waste are appropriately labeled and treated prior to discharge or disposal in accordance with applicable laws and regulations.

### 4.3 Product safety and hazardous substance management

The supplier undertakes to label hazardous materials, chemicals and substances and to ensure their safe handling, movement, storage, recycling, reuse and disposal. All applicable laws and regulations relating to hazardous materials, chemicals and substances shall be strictly complied with. Substance restrictions and product safety requirements defined by applicable laws and regulations are mandatory.

### 4.4 Material compliance and conflict materials

The supplier shall ensure that goods and materials supplied to **pfenning logistics GmbH** have not been obtained illegally or unethically. The supplier guarantees that, in the case of orders for conflict materials (tantalum, tin, tungsten, gold), these are not sourced from the Democratic Republic of Congo (DRC) or neighboring countries.

	<b>Supplier guideline</b>	
	<b>A-01.10</b> Version/status: 01/02.10.2023	Creator: MB Page 6 from 6

## 5. Final provisions

### 5.1 Conduct in the event of violations

If the supplier becomes aware of violations of this Code of Conduct, it must immediately take appropriate steps to remedy the situation and report the violations to **pfenning logistics GmbH**, stating the applicable laws.

### 5.2 Whistleblowing - protection of whistleblowers

The Supplier assures to protect whistleblowers from reprisals of any kind, for example from discrimination, termination or claims for damages.

### 5.3 Record-keeping obligations, quality management

The supplier assures that all legally prescribed recording obligations and documentation are complied with. Ideally, the supplier maintains a management system based on DIN EN ISO 9001 and thus ensures the quality-conscious provision of the commissioned services.

### 5.4 Supplier audits

**pfenning logistics GmbH** reserves the right to verify compliance with this Code of Conduct on the part of suppliers by means of self-assessments, information from third parties, presentation of certificates and on-site inspections by internal or externally commissioned persons.

### 5.5 Consent

The supplier agrees to this Code of Conduct without any changes or exceptions. The supplier shall inform employees and all downstream suppliers and subcontractors of the requirements of this Code of Conduct. It is the supplier's responsibility to ensure that the Code of Conduct is implemented - also by downstream suppliers and subcontractors.