

# SUPPLIER CODE OF CONDUCT

## HERTWICH Engineering GmbH

Braunau am Inn, 01. February 2025

[www.hertwich.com/code-of-conduct](http://www.hertwich.com/code-of-conduct)

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# Company History

1973	HERTWICH was founded by Mr. Dipl.-Ing. Günther Hertwich
1991	Construction of assembly hall in Weng, Austria
1993	Takeover by MANNESMANN-DEMAG AG, Germany
1999	Takeover by SMS group GmbH, Germany
2024	Management buy-out HERTWICH ENGINEERING GMBH

# Foreword

For Hertwich Engineering, **social principles**, such as human rights and fair working conditions, **ecological standards** relating to environmental protection and security, and **business integrity** are central corporate values.

We expressly commit ourselves to comply with the applicable laws and regulations and fulfill our corporate responsibility by consistently applying our own and international standards. We are guided in this process by, among other things, our Code of Conduct for employees and the policy statement on respect for human rights.

We attach great importance to an open, trusting, and sustainable corporate culture, and this also applies to the way we work with suppliers and sub suppliers.

We expect our suppliers to follow and comply with this Code of Conduct. The reference framework for this includes the UN's Universal Declaration of Human Rights and the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization (ILO).

We assume that our suppliers communicate all the principles and requirements described here to their subcontractors and sub suppliers, and that they consider these when choosing them. In addition, the suppliers work to ensure that their own business partners comply with the described standards regarding human rights, environmental protection, and business integrity.

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# **SOCIAL PRINCIPLES: RECOGNITION OF HUMAN RIGHTS**

## **1.1 Basic principle**

Our suppliers respect human rights in their companies and treat their employees fairly and respectfully. They recognize the core labor standards of the International Labour Organization (ILO), taking into account the laws and regulations applicable in the various countries. This includes the following aspects:

### **1.2 No child labor**

We reject child labor in our supply chain.

Our suppliers prohibit and refrain from any form of child labor in their companies.

### **1.3 No forced or compulsory labor**

Our suppliers reject all forms of forced or compulsory. Employees must have the freedom to terminate their employment with a reasonable notice period.

## **1.4 Fair treatment without discrimination**

Our suppliers promote equal opportunities and equal treatment and prohibit discrimination when hiring employees, promoting them, or offering them vocational education or training measures. Employees must not be discriminated or disadvantaged on account of their gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation, or opinions.

### **1.5 Fair remuneration and working hours**

Our suppliers arrange the working hours and remuneration of their employees in line with applicable laws and regulations.

### **1.6 Freedom of association**

In accordance with local and national laws, employees have the right to freedom of association with others, to join trade unions, to appoint workers' representatives, to form a work council, and to collective bargaining.

### **1.7 Occupational health and safety**

Our suppliers comply with the applicable occupational health and safety regulations and ensure a safe and healthy working environment, aimed at maintaining the health of employees, protecting third parties, and avoiding accidents, inquiries, and work-related illnesses.

# ECOLOGICAL STANDARDS: ENVIRONMENTAL PROTECTION AND SAFETY

## 2.1 Basic principle

We expect our suppliers to act in an environmentally responsible and resource-friendly manner, while taking into account environmental and climate protection considerations. This includes the following aspects:

## 2.2 Sustainability

Our suppliers undertake to comply with the applicable national environmental laws, regulations, and standards. In particular, they strive to minimize environmental pollution and hazards and to observe environmental protection requirements in their day-to-day business operations.

## 2.3 Product safety

Our suppliers comply with all applicable product safety rules and regulations -in particular statutory requirements- concerning the safety, marking and packaging of products, as well as the use of hazardous substances and materials.

# BUSINESS INTEGRITY

## 3.1 Basic principle

A fair and ethically correct approach in all business activities is the foundation of our corporate responsibility. We expect the same from our suppliers and consider the following aspects to ensure this:

## 3.2 Avoidance of conflict resources

Our suppliers take appropriate measures to avoid the use of raw materials in their products that originate from conflict and risk areas and contribute to human rights violations, corruption, the financing of armed groups, or similar adverse effects.

## 3.3 Prohibition of bribery and corruption

Our suppliers ensure that they refrain from any form of bribery or corruption, including the granting of other benefits and advantages. In particular, they ensure that their employees, subcontractors or agents do not offer, grant, or promise any benefits to Hertwich Engineering's employees or third parties close to them with the aim of obtaining an order or other preferential treatment in the course of business.

## 3.4 Avoidance of conflicts of interest

Decisions are made exclusively based on factual, business-related criteria. Conflicts of interest involving private interests or economic or other activities, including those of family members or other related persons or organizations, must be avoided from the very beginning.

### **3.5 Fair competition**

Our suppliers are committed to fair competition as the basic principle of a free economy and comply with the applicable national and international anti-trust laws. They do not enter into agreements that violate anti-trust law with competitors, suppliers, customers, or other third parties, and do not abuse any dominant position they may have in the market.

### **3.6 Money laundering**

Our suppliers comply with the applicable statutory anti money laundering regulations and do not participate in money laundering activities.

### **3.7 Foreign trade law**

All applicable laws for the import and export of goods, services and information, including sanctions, embargoes, ordinances, government decrees and directives are complied with.

### **3.8 Data protection**

All rights concerning the protection of the personal data of employees, customers, suppliers, and other data subjects are respected.



# COMPLIANCE AND IMPLEMENTATION

Suppliers agree without reservation to the principles and requirements laid down in this Supplier Code of Conduct and are responsible for ensuring compliance with it.

Hertwich Engineering reserves the right to review compliance with and implementation of the Code of Conduct after giving an appropriate notice period in advance. At the request of Hertwich Engineering, suppliers shall submit sufficient supporting documents to prove full compliance with the Code of Conduct.

If a supplier fails to comply with the terms of the Code of Conduct and fails to implement appropriate improvements within an agreed period, this will significantly impair the supplier's contractual relationship. In such cases, Hertwich Engineering reserves the right, without prejudice to other rights, to terminate the business relationship by extraordinary termination without notice.





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