



# SUPPLIER CODE OF CONDUCT

BLG LOGISTICS GROUP

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## 1.Preamble

The following requirements specify the expectations of BLG LOGISTICS GROUP AG & Co. KG including its affiliated companies within the meaning of sections 15 et seq. German Stock Corporation Act (hereinafter referred to as "BLG LOGISTICS") on the attitude and conduct of suppliers in their business activities. The requirements are regarded as the basis for a successful business relationship between BLG LOGISTICS and its business partners.

These sustainability requirements for suppliers are based on national and international guidelines and conventions such as the principles of the UN Global Compact, the Charter for Long-Term Sustainable Development of the International Chamber of Commerce, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the relevant conventions of the International Labor Organization (ILO), as well as the guidelines of the Drive Sustainability Initiative for improving sustainability performance in the supply chain.

Furthermore, these sustainability requirements are based on internal standards and values as well as BLG LOGISTICS' understanding of sustainability. These include the principles of conduct (Code of Conduct) for employees as well as the occupational health and safety, environmental and energy policies and the goals and targets derived from them.

BLG LOGISTICS aims to impress its competitors with the quality and value of its services as well as through successful and sustainable business activities. The company's long-term success also depends on identifying risks and opportunities at an early stage and consistently complying with laws, regulations, ethical principles, and voluntary commitments. BLG LOGISTICS not only sets high standards within its Group, but also works along the entire value chain to ensure compliance with these values. Behind this is the simple realization that responsible action and economic success are not mutually exclusive, but rather mutually beneficial. We expect this understanding and attitude not only from all our employees, but also from our suppliers. Our suppliers communicate these principles and the resulting obligations to their employees as well as to their own suppliers. They can also implement further-reaching rules.

BLG LOGISTICS' suppliers play a key role in shaping the Group's corporate success. Partnership-based behavior creates lasting business relationships that are characterized by mutual benefit. The Group therefore relies on close cooperation with its suppliers. In line with the principle of sustainability, we are aware of our responsibility for the economic, ecological, and social impact of our actions. We also expect this from our suppliers, particularly with regard to human rights, occupational health and safety, environmental protection and anti-corruption.

With the commitment to comply with this Supplier Code of Conduct and to act with integrity and in accordance with the law, we are equipped for a successful future together. Our daily actions should be characterized by integrity and ethical conduct.

## **2.Scope of application**

The following sustainability requirements apply to all business relationships between BLG LOGISTICS and its suppliers to the extent that they apply to the respective business activity. In addition, suppliers are also committed to compliance with the requirements in an appropriate form by their own suppliers and along the supply chain.

## **3.Requirements for suppliers**

### **3.1 Social responsibility**

#### **3.1.1 Exclusion of forced labor**

Suppliers of BLG LOGISTICS are committed to the elimination of all forms of forced labor. No forced labor, slave labor or comparable work or service which is required of a person under threat of any penalty and for which he or she has not voluntarily made himself or herself available may be used. Employment relationships are based on voluntariness and may be terminated by employees at their own will and with reasonable notice. There is no unacceptable treatment of workers, such as psychological hardship, sexual or personal harassment.

### **3.1.2 Prohibition of child labor**

Child labor is prohibited. Suppliers are requested to comply with the recommendation from the ILO conventions on the minimum age for the employment of children. According to this, the age should not be less than the age at which compulsory schooling ends, and in any case not less than 15 years. If children are found at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school.

The rights of young employees must be protected. To this end, special protective regulations must be observed.

### **3.1.3 No discrimination and no harassment**

Suppliers reject any form of discrimination and harassment. They shall not discriminate against their employees on the basis of gender, ethnic origin, color, marital status, social origin, physical or mental disability, religion, age, pregnancy, nationality, sexual orientation, trade union membership or political affiliation, provided these are based on democratic principles and tolerance of dissent. Suppliers must work to eliminate discrimination in employment and occupation by selecting, hiring and promoting employees on the basis of their qualifications and abilities.

Suppliers are committed to a working environment that is free from harassment. The personal dignity, privacy and personal rights of each individual are respected.

### **3.1.4 Fair pay**

The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry. The remuneration for overtime must in any case exceed the remuneration for regular hours. Employees must be provided with all benefits and social services required by law. Deductions from wages as a punitive measure are not permitted. Suppliers shall ensure that employees receive clear, detailed and regular written information on the composition of their pay.



### **3.1.5 Fair working hours**

Working hours must comply with applicable laws or industry standards. Overtime is permitted only if it is performed on a voluntary basis and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive working days. Weekly working hours may not regularly exceed 48 hours.

### **3.1.6 Freedom of association**

The fundamental right of workers to form and join organizations of their choice and to bargain collectively shall be respected. Respect for freedom of association and the effective recognition of the right to collective bargaining shall be ensured. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of workers for the purpose of collective bargaining shall be provided. Employee representatives shall be adequately protected from discrimination and from any differential treatment contrary to freedom of association which is related to their employment. They shall be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

### **3.1.7 Health protection; safety at work**

Suppliers are responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with employment. In addition, employees are regularly informed and trained on applicable health and safety standards and measures. Employees are provided with access to drinking water in sufficient quantities and access to clean sanitary facilities.

### **3.1.8 Conflict minerals management**

For conflict minerals such as tin, tungsten, tantalum and gold, and for other raw materials such as cobalt, suppliers establish processes in line with the OECD's Due Diligence Guiding Principles to promote responsible supply chains, and expect their own suppliers to do the same. This includes the implementation of measures aimed at identifying risks – including those related to direct or indirect financing of armed conflicts and related to serious human rights abuses, including child and forced

labor and slavery – and taking appropriate measures to mitigate them. This further includes suppliers working continuously on transparency in the upstream supply chain to raw material extraction, not knowingly providing products that contain raw materials that contribute to bribery and ethical violations or have a negative impact on the environment.

### **3.2. Ecological responsibility**

Environmental and climate protection, and thus the assumption of ecological responsibility, are an important part of BLG LOGISTICS' sustainability efforts. Therefore, our suppliers must implement and maintain ecologically responsible business practices that minimize their impact on the environment.

#### **3.2.1 Systematize environmental protection**

All relevant local and national environmental laws as well as international standards are to be complied with by our suppliers, necessary environmental permits are to be obtained and presented upon request. Our suppliers shall develop and implement an appropriate and effective environmental management system to systematically identify, monitor and eliminate environmental risks. In this regard, we recommend certification in accordance with ISO 14001 or orientation towards this standard; energy management in accordance with ISO 50001 is desirable.

#### **3.2.2 Conservation of resources**

The use and consumption of any resources, including water and energy, during production and handling, and the generation of waste of any kind shall be reduced or avoided, and reuse and recycling shall be increased.

#### **3.2.3 Dealing with energy consumption/efficiency; renewable energies**

Energy consumption is to be monitored and documented. Economic solutions are to be found to improve energy efficiency and minimize energy consumption. Suppliers are expected to increase the use of renewable energy and drive decarbonization.



### **3.2.4 Handling waste and hazardous substances**

Suppliers follow a systematic approach to identify and manage solid waste. They are also required to reduce waste, increase reuse and recycling rates, and dispose of waste in a responsible manner. Chemicals or other materials that pose a hazard when released into the environment shall be identified and handled in such a way that their handling, transport, storage, use, recycling or reuse, and disposal fully ensures the safety of people and the environment at all times.

### **3.2.5 Water consumption and quality**

Suppliers are expected to systematically control their water use, reduce consumption where possible, and responsibly dispose of or recycle wastewater to protect the environment and improve overall water quality.

### **3.2.6 Handling emissions**

Suppliers must identify, record, reduce and responsibly control air emissions from their operations that pose a risk to the environment. Suppliers are expected to record their greenhouse gas emissions, seek reductions, and report emissions from their products or services upon request. Suppliers identify, control, monitor, and reduce noise generated by their operations that exceeds sound limits.

## **3.3 Ethical business conduct**

### **3.3.1 Fair and free competition**

The standards of fair business, fair advertising and fair and free competition must be observed. In addition, the applicable antitrust laws must be applied, which, in dealing with competitors, prohibit in particular agreements and other activities that influence prices or conditions, or the abuse of a dominant market position. Furthermore, these regulations prohibit agreements between customers and suppliers aimed at restricting customers' freedom to determine their prices and other conditions autonomously when reselling.

### **3.3.2 Data privacy**

Suppliers undertake to protect personal data in accordance with the expectations of their clients, suppliers, customers, consumers, and employees. They shall observe the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting, and forwarding personal data. The right of every individual to legal protection against such interference or impairment shall be respected.

### **3.3.3 Confidentiality**

Suppliers shall use and protect any information in an appropriate manner. Data shall be handled according to its classification. Suppliers shall ensure that data worthy of protection is properly collected, processed, secured and deleted. Suppliers shall oblige their employees to protect business secrets. Confidential content may not be published, passed on to third parties or made available in any other form without authorization.

### **3.3.4 Intellectual Property**

Intellectual property rights shall be respected; technology and know-how transfers shall be made in a manner that protects intellectual property rights and customer information.

### **3.3.5 Integrity/bribery, taking advantage**

The highest standards of integrity must be applied in all business activities. Suppliers shall have a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Monitoring and enforcement procedures shall be in place to ensure compliance with anti-corruption laws. It must also be ensured that the applicable provisions against money laundering are complied with. Suppliers are expected to conduct their business in a manner that avoids any appearance of dishonesty and, in particular, conflicts of interest. A conflict situation may arise, for example, if family members or other related persons work for business partners or competitors or may have a personal or financial interest. When initiating business

relationships, making purchasing or hiring decisions, the selection process is transparent and based on factual and objective criteria.

### **3.3.6 Import/export controls**

Suppliers pay strict attention to compliance with all applicable laws governing the import and export of goods, services, and information. They always observe the relevant sanctions lists.

## **4. Complaint mechanisms**

Suppliers are responsible at site level for establishing an effective grievance mechanism for individuals and communities who may be affected by adverse impacts. Even where legal systems are effective and well resourced, complaint mechanisms can offer particular advantages, such as rapid access and redress, reduced costs, and transnational reach. Employees who file a complaint for violations of this Supplier Code of Conduct or relevant laws shall not be subject to any form of disciplinary action or comparable sanctions.

Suppliers shall set up the complaint procedure in such a way that it also allows persons who may be injured by economic activities of an indirect supplier in one of the aforementioned requirements, as well as persons who have knowledge of a possible violation of an aforementioned requirement, to point out this violation.

## **5. Implementation**

The company verifies compliance with the standards and regulations listed in this document by means of a self-assessment questionnaire and/or sustainability audits. Suppliers agree that BLG LOGISTICS may carry out such audits to verify compliance with the Code at the suppliers' operating sites during normal business hours after giving reasonable advance notice by persons appointed by BLG LOGISTICS. Suppliers may object to individual audit measures if these would violate mandatory data protection regulations.

If a supplier's violation of one of the aforementioned requirements is such that it cannot end in the foreseeable future, it must immediately create and implement a concept to minimize it. The concept must contain a concrete time schedule. The following measures in particular should be considered when drawing up and implementing the concept:

- the development and implementation of a plan to remedy the grievance, if necessary with the involvement of the company's own supplier, insofar as the violation is caused by the latter,
- joining forces with other companies within the framework of industry initiatives and industry standards in order to increase the possibility of exerting influence on the perpetrator,
- temporary suspension of the business relationship while efforts are made to minimize the risk.

The effectiveness of the remedial measures shall be reviewed by the supplier once a year as well as on an ad hoc basis.

These requirements shall apply accordingly if suppliers obtain substantiated knowledge of a possible violation of the aforementioned requirements at their own suppliers.

## **6. Points of contact in the event of misconduct**

In order to protect BLG LOGISTICS, its employees and business partners, any misconduct must be identified at an early stage, dealt with and remedied without delay. This requires the attention of all involved and their willingness to point out possible violations of rules in the event of concrete indications. We also value information from our suppliers' business partners, their customers or other third parties.

For these reasons, it is possible to contact the Compliance Officer or the Ombudsperson of BLG LOGISTICS. The external lawyer appointed as ombudsperson is subject to attorney-client privilege. He receives the information in

strict confidence, examines it in advance and forwards it to the BLG LOGISTICS Compliance Officer with the consent of the whistleblower – if desired also in anonymized form.

#### Contact options:

<b>Stefan Häseker</b> Compliance Officer  compliance@blg.de Direct.: +49 (0) 421-398 3785 Cell: +49 (0) 151-543 52194	<b>Nermin Varmaz</b> Deputy  nermin.varmaz@blg.de Direct: +49 (0) 421-398 3156 Cell: +49 (0) 151-118 32753	<b>Markus Klindwort, Attorney</b> Ombudsperson  Deputy: Christian Menges, Attorney blg-ombudsmann@rmk-partner.de Direct: +49 (0) 421-3339 2266
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## **7. Consequences of violations**

A violation of this Code of Conduct may be reason and cause for BLG LOGISTICS to terminate the business relationship including all associated supply contracts. BLG LOGISTICS considers compliance with the requirements formulated in this document to be essential for the respective business relationship. If a supplier does not comply with these requirements, BLG LOGISTICS reserves the right to take appropriate legal action.

It is the sole decision-making authority of BLG LOGISTICS to forego such consequences and to take alternative measures in their place if the supplier credibly assures and can prove that countermeasures have been initiated immediately to prevent future similar violations.

## **8. Acknowledgement and consent of the supplier**

Suppliers undertake to act responsibly and to comply with the principles/requirements listed. They also undertake to communicate the contents of this Code to employees, agents and their own suppliers in a manner that is comprehensible to them and to take all necessary precautions to implement the requirements.