



As part of our collective commitment to promoting ethical business practices and social responsibility, the SMB Group is proud to present its Supplier Code of Conduct.

This Code of Conduct was designed to ensure that our business relationships are based on shared values, integrity, and sustainability. We firmly believe that adherence to these standards is not only important for your company but also has a positive social and environmental impact on the global community. In this Code, you will find clear requirements and expectations that we set for our partnerships with companies to ensure that our collaboration always meets the highest ethical and professional standards. We value your commitment to these values and look forward to working together toward a better future.

1. Requirements

1.1. Social Responsibility

Working Hours and Compensation

SMB expects its suppliers to comply with applicable national laws regarding working hours. Furthermore, it is expected that suppliers' employees receive compensation in accordance with applicable national laws.

Freedom of Association

SMB expects its suppliers to respect employees' rights to form employee representative bodies and engage in collective bargaining in accordance with national legislation.

Child Labor and Underage Employees

SMB expects its suppliers to prohibit and refrain from any form of child labor within their operations. Employment relationships with individuals under the age of 18 may only involve non-hazardous work and are permitted only if the young employees have reached the legally prescribed minimum age for employment or are no longer of school age.

Modern slavery

Any form of slavery is incompatible with our ethical principles. SMB expects its suppliers not to permit or participate in any form of forced labor or human trafficking within their companies and to combat all forms of slavery.

Health and Safety

SMB expects its suppliers to comply with applicable national legislation regarding health and safety at work. In addition, suppliers are expected to establish and implement an appropriate occupational safety management system (e.g., in accordance with SCC**/SCCP). This includes, on the one hand, mitigating actual and potential occupational safety risks and, on the other hand, training employees to prevent accidents and occupational illnesses as effectively as possible.

Suppliers must protect employees of all genders and ages from excessive exposure to chemical, biological, and physical hazards and physically demanding tasks in the workplace and at all locations associated with the work.

Discrimination

SMB expects its suppliers to promote equal opportunity and equal treatment and to prevent discrimination in the hiring of employees as well as in promotions or the provision of training and continuing education. No employee may be discriminated against on the basis of gender, age, skin color,

discriminated against on the basis of culture, ethnic origin, sexual identity, disability, religious affiliation, or worldview.

Women's Rights

In our Code of Conduct, we reaffirm our commitment to promoting and protecting women's rights. We are committed to acting without discrimination and ensuring equal opportunities and rights for all genders. We firmly reject any form of violence or harassment against women and strive to create safe and inclusive work environments. Promoting gender equality is not only an ethical obligation but also an essential part of our corporate culture.

Diversity, Inclusion, and Non-Discrimination

SMB expects its suppliers to recognize the equal treatment of all employees as a fundamental principle of their corporate policy.

Discrimination in any form is strictly prohibited. In this context, discrimination is defined as the basis for decisions that have nothing to do with professional activities or business interests and that—consciously or unconsciously—are based on irrelevant characteristics of employees. Such characteristics may include, for example, age, ethnic origin, marital status, gender, gender expression, gender identity, membership in an employee representative body, national origin, physical characteristics, pregnancy, religion, sexual orientation, skin color, social background, union membership, volunteer work, or other criteria prohibited by applicable law.

Suppliers are also required to provide their employees with a work environment characterized by fairness and humanity, free from sexual harassment, sexual abuse, corporal punishment, psychological or physical coercion, and verbal abuse or the threat of such actions. In this context, SMB expressly encourages suppliers to create an inclusive and supportive work environment by prioritizing diversity in the selection of their employees.

These measures to promote diversity, equality, and inclusion are of central importance to SMB in ensuring that discrimination is actively combated and that all employees experience equal opportunities and respect.

Whistleblowing and Protection Against Retaliation

The supplier is responsible at the operational level for establishing an effective grievance mechanism for individuals and communities that may be affected by adverse impacts, including those within the supply chain. Even where legal systems are effective and well-resourced, grievance mechanisms can offer particular advantages, such as rapid access and swift redress, reduced costs, and transnational reach. Employees who file a complaint regarding violations of this Code of Conduct or applicable laws shall not be subject to any form of disciplinary action.

1.2. Environmental Responsibility

Environmental Protection

SMB expects its suppliers to comply with applicable national environmental laws, regulations, and standards. Furthermore, suppliers are expected to establish and implement an appropriate environmental management system (e.g., in accordance with ISO 14001) to minimize environmental impacts and hazards and to improve environmental protection in daily business operations.

Waste

Suppliers are responsible for ensuring that appropriate measures are taken during the handling, storage, transport, disposal, recycling, and reuse of waste to prevent any potentially adverse effects on human health or the environment.

Wastewater

Wastewater from operational activities, manufacturing processes, and sanitary facilities must be analyzed, monitored, inspected, and, if necessary, treated prior to discharge or disposal. Additionally, measures should be taken to reduce the generation of wastewater.

Air Emissions

Emissions from general operations, including air and noise emissions, as well as greenhouse gas emissions, must be analyzed, regularly monitored, reviewed, and, if necessary,

treated. The supplier is also obligated to monitor its exhaust gas treatment systems and find cost-effective solutions to minimize all emissions.

Natural resources

The use and consumption of resources during production, as well as the generation of any waste—including water and energy—must be reduced or avoided. This can be achieved either through direct on-site measures or through procedures and initiatives such as adapting production and maintenance processes, revising business procedures, using alternative materials, improving efficiency, or recycling or reusing materials.

1.3. Responsible Business Conduct

Data Protection and Intellectual Property

Suppliers undertake to treat confidential information appropriately and to protect it accordingly. They must ensure that data requiring protection and the valid intellectual property rights of their own employees and business contacts are safeguarded. Suppliers shall manage confidential information or data belonging to customers and business partners appropriately and protect it from unauthorized access, use, disclosure, alteration, or destruction.

Personal information is collected only for legitimate business purposes and used only in a legal, transparent, and secure manner. Disclosure is limited exclusively to authorized individuals. Information is handled in accordance with security regulations and retained only for as long as necessary; third parties with access to personal information are also obligated to respect its protection. The requirements of the GDPR must be observed.

Plagiarism

Suppliers are obligated to take all necessary and appropriate measures within their area of responsibility to ensure that neither products nor their processable components or raw materials nor the corresponding know-how fall into the hands of unauthorized third parties and/or leave the legitimate supply chain.

Conflicts of Interest

Our suppliers make decisions based on objective considerations and do not allow themselves to be unduly influenced by personal interests.

Disclosure of Information

Our suppliers agree to provide immediate notification as soon as the quality of the goods and services supplied is negatively affected.

Financial Responsibility

Suppliers undertake to develop business continuity plans for their operations in a manner that supports our customers' business.

Export Controls and Economic Sanctions

Suppliers also agree to comply with applicable export control regulations and economic sanctions relevant to their business and to provide accurate and truthful information to customs and other authorities as required.

Definition and Implementation of Similar Standards by Our Own Tier-1 Suppliers

Our commitment to promoting ethical business practices and social responsibility extends beyond our own activities and also includes our Tier 1 suppliers. We expect our suppliers to adhere to standards and principles similar to those described in this Code of Conduct. This includes our Tier 1 suppliers actively opposing discrimination, child labor, forced labor, and any form of exploitation, and ensuring that their own working conditions respect human rights. We encourage our suppliers to develop clear guidelines and procedures for implementing these standards and to enforce them consistently. We also expect them to train and raise awareness among their employees regarding compliance with these standards.

The implementation of these standards by our Tier 1 suppliers is of critical importance, as they are an integral part of our supply chain.

Binding requirements for Tier 1 suppliers to cascade standards throughout the supply chain

We strongly urge our Tier 1 suppliers to disseminate the standards and principles set forth in this Code of Conduct throughout their own supply chains and to ensure that their Tier 2 and subsequent suppliers comply with them. This includes our Tier 1 suppliers establishing clear and transparent communication channels to ensure that expectations regarding ethical business practices, human rights, working conditions, environmental protection, and other relevant areas are communicated to their own suppliers.

Responsibility for compliance with these standards extends throughout the entire supply chain, and we expect our Tier 1 suppliers to proactively take measures to ensure that their own suppliers understand and implement these standards. This may include training, audits, and other appropriate mechanisms to verify and promote compliance.

Passing on standards throughout the supply chain is crucial to promoting ethical, sustainable, and responsible business practices and ensuring that our values and principles are shared by all stakeholders in our supply chain.

Fair Competition

Requirements regarding fair business practices, fair advertising, and fair competition must be complied with. In addition, applicable antitrust laws must be followed. These laws specifically prohibit collusion and other activities that influence prices or terms of competition. It is also prohibited to enter into or coordinate agreements between customers and suppliers that are intended to impair customers' autonomy in setting their sales prices and other terms.

Anti-Corruption and Anti-Money Laundering

We expect our suppliers to actively combat all forms of corruption and money laundering and to comply with applicable laws and regulations. This includes a commitment to transparency in all business transactions, the disclosure of conflicts of interest, and the implementation of effective measures to prevent money laundering.

Our suppliers may not enter into any agreements or engage in any coordinated activities with other companies that are intended to prevent, restrict, or distort competition in violation of applicable antitrust laws. Furthermore, they may not unlawfully exploit any dominant market position they may hold.

SMB requires its suppliers to comply with the Code of Conduct in its currently valid version.