

Supplier Code of Conduct (SCoC)

Improve – sustainable change and renewal!

As a successful family-owned company, the Piepenbrock Group accepts responsibility for ensuring that its services throughout the entire value chain are provided in line with international standards for responsible business conduct. As part of our social responsibility, we place great importance on ensuring that our services reflect ecological, social, and ethical standards. We view our suppliers as a key part of our sustainability strategy and expect them to actively contribute to fulfilling our corporate due diligence obligations. We have there-

fore summarized our expectations regarding working conditions, health and safety, environment, and business ethics in this Supplier Code of Conduct. The Piepenbrock Group's Code of Conduct is based on the principles of the United Nations Global Compact (UNGC) and the Core Labor Standards of the International Labor Organization (ILO). In addition, the requirements of our Human Rights Policy Statement apply.

Arnulf and Olaf
Piepenbrock,
Managing Directors



A foundation for partnership

We expect our suppliers to acknowledge, implement, and actively integrate the standards described in this Code of Conduct into their own supply chains. This includes, in particular, full compliance with all relevant legal requirements as well as respect for fundamental labor, environmental, and human rights standards.

Adherence to these principles is a key prerequisite for a relationship built on trust, fairness, and sustainability. It reflects our shared commitment – to ourselves and to our partners – to continually strengthen the quality of our collaboration, our business success, and our corporate responsibility.

Social responsibility and human rights

Piepenbrock expects its suppliers to fully respect human rights and to ensure fair, safe, and non-discriminatory working conditions – regardless of industry, country, or company size. Social sustainability is a cornerstone of responsible business conduct.

Respect for human rights

Suppliers are required to respect internationally recognized human rights in accordance with the Universal Dec-

laration of Human Rights and the ILO Core Labor Standards. This includes, in particular, the strict prohibition of child labor, forced labor, human trafficking, and all other forms of modern slavery.

Suppliers must also recognize the right of all employees to form or join trade unions, establish employee representation, and engage in collective bargaining – regardless of position, origin, or employment type. Employees must not be disadvantaged or threatened for exercising these rights. Suppliers are responsible for ensuring that these principles are also observed and implemented by subcontractors, temporary employment agencies, and other partners within their supply chains.

Fair working conditions

Suppliers must comply with all applicable labor and social legislation in the respective country of operation. Employment contracts and working conditions must be documented in writing and designed to be transparent and understandable.

Working hours must be organized reasonably, and legal limits on maximum working time must not be exceeded. Overtime must be voluntary,

properly recorded, and compensated in accordance with the law. Employees are entitled to regular rest periods, paid leave, and the legally required minimum rest days per week.

Wages must be paid on time and at least in line with the statutory minimum wage or applicable industry or collective bargaining standards. Wage deductions as a disciplinary measure are not permitted.

Health protection and occupational safety

Suppliers must provide a safe, healthy, and hygienic working environment for all employees – regardless of employment type or work location. They must identify work-related hazards and take effective protective measures to prevent accidents and occupational illnesses.

These include risk assessments, regular safety training, personal protective equipment, clear emergency plans, occupational health care, and first-aid measures. Workplaces, machinery, systems, and tools must be operated safely and in compliance with legal requirements.

Psychological stress at work must also be taken into account. Supervisors and employees must be made aware of and trained in safe work practices. These standards also apply to subcontractors and commissioned service providers.

Equal treatment, diversity, and inclusion

Any form of discrimination is incompatible with the values of the Piepenbrock Group. Suppliers must prevent any form of disadvantage, harassment, or exclusion based on origin, gender, religion, belief, skin color, age, disability, sexual orientation, identity, marital status, political views, or any other legally protected characteristic.

Suppliers are expected to actively promote a respectful, tolerant, and inclusive working environment. This includes measures such as work-life balance initiatives, equal career opportunities, accessible workplaces, and a culture of open and respectful communication.

Suppliers must support equal participation for all employees – regardless of role or level of seniority – and promote diversity as an integral part of a future-oriented corporate culture.

Business ethics and integrity

Piepenbrock expects its suppliers to demonstrate a high level of integrity, transparency, and legal compliance. Business relationships are built on mutual trust, which must be strengthened and safeguarded through lawful and ethical conduct. All business activities must be carried out in compliance with applicable laws and in line with the principles of responsible corporate governance.

Anti-corruption

Corruption, bribery, and any form of improper advantage, whether offered or received, are strictly prohibited. This applies equally to dealings in the public sector and in private business relationships. Suppliers must not offer, request, or accept gifts, benefits, or any other advantage that could improperly influence a business decision, regardless of whether the benefit is material or immaterial.

Acceptable business practices such as invitations or promotional gifts must remain within reasonable limits, be properly documented, and must never be linked to any obligation or expectation of reciprocity. Piepenbrock expects suppliers to have internal mechanisms in place to prevent corruption, for example, through employee training, a four-eyes review principle, or compliance contacts.

Competition and antitrust law

Suppliers must comply with all applicable national and international laws governing competition, antitrust, and public procurement. Price fixing, market allocation, bid rigging, or the abuse of a dominant market position are prohibited.

Violations of these laws can have serious legal and financial consequences – not only for the company involved, but also for Piepenbrock as a business partner. Suppliers must ensure that their employees are trained in these areas and that they fully comply with competition regulations.

Data protection and information security

Our suppliers are required to treat personal data and confidential information with the utmost confidentiality and to comply with all applicable data protection laws (e.g., GDPR). The following principles also apply:

Secure information exchange:

Confidential or proprietary information may only be transmitted through secure channels. This includes the use of encryption technologies, protected communication environments, and the obligation to ensure that confidential conversations cannot be overheard by unauthorized third parties.

IT security and access rights:

All devices used must be equipped with up-to-date security patches, firewalls, and antivirus software. Access rights to systems and data must be granted strictly on a need-to-know basis. Shared user accounts or the disclosure of passwords are not permitted. The supplier must promptly revoke access rights when an employee leaves the company.

Handling security incidents:

Serious information security incidents – such as cyberattacks, data loss, system outages, or unlawful activity – must be reported immediately to the Piepenbrock Group. The same applies in the event of suspected unauthorized disclosure of confidential information.

Audit and inspection rights:

The Piepenbrock Group reserves the right to verify compliance with these requirements through audits or inspections at the supplier's premises. The supplier undertakes to remedy any identified deficiencies within a reasonable timeframe and to provide proof of corrective action.

Obligations of subcontractors:

If the supplier engages subcontractors, it assumes full responsibility for ensuring compliance with the data protection and information security

requirements described in this document. The supplier is required to conclude appropriate confidentiality agreements, ensure their enforcement, and provide evidence of compliance to the Piepenbrock Group upon request.

Confidentiality declarations with employees:

The supplier must ensure that all employees who have access to confidential information of the Piepenbrock Group sign a written confidentiality agreement, either separately or as part of their employment contract. Proof of compliance must be provided to the Piepenbrock Group by the supplier upon request at any time.

Intellectual property

Suppliers must respect intellectual property rights, including patents, trademarks, copyrights, and designs. Protected content, technologies, or product markings may only be used with proper authorization. The unauthorized disclosure, duplication, or misappropriation of third-party know-how is prohibited.

Suppliers must ensure that their employees understand the importance of intellectual property protection and are aware of the consequences of violations.

Conflicts of interest

Business decisions must be made in the best interests of the company and free from personal or financial conflicts of interest. Suppliers must have appropriate internal procedures in place to prevent private interests of decision-makers from interfering with their professional responsibilities.

Any potential or actual conflicts of interest – such as those arising from family relationships, secondary employment, or financial holdings – must be disclosed and addressed transparently with Piepenbrock. The goal is to preserve objectivity and integrity in all business dealings.

Export controls and trade sanctions

Suppliers must comply with all applicable laws and regulations governing export controls, import restrictions, international trade sanctions, and embargoes. This applies in particular to dealings involving listed goods, technologies, services, or business partners.

Suppliers must ensure that no business activities are conducted with countries, individuals, or organizations subject to sanctions. They are required to implement appropriate processes for screening business partners and export transactions to prevent violations of foreign trade regulations.

Environmental and climate responsibility

Suppliers of the Piepenbrock Group are expected to minimize their environmental impact and actively contribute to the protection of natural resources. The goal is to ensure a responsible approach to resources, emissions, and land use that not only meets legal requirements but goes beyond them.

Climate protection

We expect our suppliers to take appropriate measures to reduce their greenhouse gas emissions and to systematically lower their climate impact. This includes developing company-specific climate targets and implementing effective reduction strategies across their own processes and supply chains. Targets should be measurable, transparent, and aligned with internationally recognized standards.

Waste and emissions management

Suppliers must take effective measures to prevent or minimize waste generation and environmentally or health-damaging emissions – particularly those affecting air, soil, and water. Waste and wastewater must be handled properly and disposed of in an environmentally sound manner. This also includes the safe and responsible handling of hazardous substances and

cleaning agents. Such materials must be managed in accordance with a legally compliant chemical management system covering labeling, storage, transport, use, and disposal.

Resource conservation and circular economy

Efficient use of natural resources is a key component of sustainable business practice. Suppliers are required to use energy, water, raw materials, and auxiliary materials sparingly and efficiently. The use of environmentally friendly, low-emission, and, where possible, certified materials is expressly encouraged.

Material use and product design should promote durability, reuse, and recyclability. Suppliers are expected to support take-back systems, material reduction initiatives, and recycling-friendly design concepts to strengthen circular material flows and reduce the consumption of finite resources.

Biodiversity and land use

The natural diversity of ecosystems and species must be protected and preserved in the course of business activities. Suppliers must avoid interventions in sensitive natural or protected areas and take potential impacts on biodiversity into account

when selecting locations and managing their supply chains.

Implementation, monitoring, and cooperation

Piepenbrock expects its suppliers to integrate the principles of this Code into their organizational structures and business processes and to raise awareness of them among their employees. Subcontractors and key suppliers must also be contractually obligated to comply with these standards.

Implementation must be documented through appropriate measures. Piepenbrock reserves the right to verify compliance through audits, on-site inspections, or written self-assessments. In cases of non-compliance, we reserve the right to take action, up to and including termination of the business relationship.

Suppliers are required to cooperate in risk assessments and to provide all relevant information. If risks are identified, Piepenbrock may require the implementation of a concrete action plan.

Whistleblower protection and protection against retaliation

Piepenbrock provides a central whistleblowing system through which suspected violations of legal requirements or of the standards set out in this Code can be reported. This system is also available to suppliers and their employees. Reports may be submitted at any time, confidentially and, if desired, anonymously via the website.

Suppliers are expected to inform their employees of this option and to ensure access to the system.

All reports are handled in strict confidence and reviewed as part of a structured, fair, and legally compliant process. Piepenbrock guarantees protection for whistleblowers against any form of discrimination, retaliation, or other disadvantage – even if a reported suspicion later proves to be unfounded.

Goal tracking and continuous improvement

The requirements of this Code are reviewed regularly and, if necessary, systematically updated – at least every two years. This review is based on existing internal processes for risk analysis, goal tracking, and progress documentation, which allow us to systematically review, assess, and further develop each topic area in terms of relevance, objectives, and level of implementation.

Suppliers are encouraged to communicate progress in a transparent manner and to actively pursue opportunities for improvement. Piepenbrock promotes ongoing dialogue and supports partner companies in developing sustainable structures and processes.