



## SENSECA Supplier Code of Conduct (January 2024)

The following sustainability provisions define standards and Senseca Group's requirements for its Suppliers:

- compliance with internationally recognised human rights and employee rights,
- banning child labour and forced labour,
- adhering to and promoting ethical commercial behaviour and complying with legal standards and environmental guidelines; and
- preventative environmental protection,
- promoting standards in the Supply Chain,
- standards relating to privacy, confidentiality, information security and data protection,
- information on grievance procedures and protection against retaliation.

The sustainability provisions are based, amongst other things, on internationally recognised principles of the United Nations Global Compact (<http://www.unglobalcompact.org>) and International Labour Standards (ILS) of the International Labour Organization (ILO) (<http://www.ilo.org>).

### The Supplier commits to comply with the following standards:

#### I. Standards on working conditions/staff and personnel

##### 1. Wages, social security and employee benefits, hours of work

Remuneration and social security and employee benefits must be guaranteed in accordance with basic statutory principles for minimum wages, overtime and legally prescribed social security and employee benefits. Hours of work must comply with applicable laws, industry standards and relevant ILO conventions. Overtime should

only be completed on a voluntary basis and workers should be given at least one day off after 6 consecutive days at work.

## 2. Prohibition and elimination of child labour

The Supplier ensures on behalf of his company, that production or processing of products to be delivered is or has been carried out without exploitative child labour according to the spirit of ILO Convention No. 182, as well as without violating obligations arising from implementation of this Convention, or of other applicable national or international regulations to combat exploitative child labour. Furthermore, the Supplier ensures that its company, suppliers and their subcontractors have taken active and targeted measures to exclude exploitative child labour according to the spirit of ILO Convention No. 182 for manufacturing or processing products to be supplied. The Supplier is obliged to commit its subcontractors accordingly and to carry out control measures in this respect.

## 3. Free choice of employment

The Supplier shall not employ anyone against their will or force anyone to work against their will. Workers and employees must be free to terminate the employment relationship with reasonable notice. Workers must not be required to hand over their national identity card, passport or work permit as a precondition of employment.

## 4. Freedom of association

Workers must be able to communicate openly with management about working conditions without fear of reprisals of any form. They must have the right to freely associate, join a union, to appoint representatives and be elected to representation.

## 5. Health and Safety

As an employer, the Supplier guarantees occupational safety and health in the workplace, within the context of national regulations and supports continuous development for improving the working environment.

## II. Ethical business standards

### 1. Anti-corruption and compliance

Within the scope of its business activities with Senseca, the Supplier is obliged to refrain from anything that could lead to criminal liability due to fraud or breach of trust, offences relating to insolvency, offences against competition, granting advantages, bribery or other corrupt offences by people employed by the Supplier or other third parties. In the event of violating one of these, Senseca will be entitled to withdraw from or terminate all legal transactions with the Supplier without notice, and to break off all negotiations. Notwithstanding the above, the Supplier is obliged to comply with all laws and regulations applying to it and the business relationship with Senseca.

### 2. Prohibition of discrimination

Discrimination against employees in any form whatsoever is not permitted. This applies to discrimination based on, for example, gender, race, caste, skin colour, disability, trade union membership, political beliefs, origin, religion, age, pregnancy or sexual orientation.

### 3. Quality and Safety

All products and services must meet the contractually specified quality and safety criteria on delivery, and must be safe to use for their intended purpose.

## III. General environmental standards and environmental compatibility

### 1. General environmental responsibilities, environmentally friendly production and products

Senseca commits to integrating environmental protection that even addresses causes, assesses the effects of production processes and products on the environment in advance, and to incorporate these into corporate decision-making. By so doing, products and production are designed to save resources as far as

possible, and to be as environmentally compatible as possible from a holistic point of view.

The Supplier will act in accordance with the precautionary principle with regard to environmental protection, and will take initiatives to promote greater environmental responsibility and encourage development and dissemination of environmentally friendly technologies. It will ensure a high level of environmental protection at all stages of production. This includes a proactive approach to preventing or minimising the consequences of accidents, that may have a negative impact on the environment. Special significance is afforded application and further development of water and energy-saving technologies - characterised by using emission reduction strategies, reuse and recycling. All products manufactured along the supply chain must meet environmental protection standards of their respective market sector. This includes all materials and substances used in production. Chemicals and other substances that pose a hazard or danger if released into the environment must be identified. Management of Hazardous Substances must be established and introduced for them, so that they can be safely handled, transported, stored, reprocessed or reused and disposed of using appropriate procedures.

## 2. Confirmation/compliance with prohibitions of substances

Substances subject to legal restrictions or prohibitions may only be contained in delivered materials or components in accordance with these regulations (e.g. the Chemicals Prohibition Ordinance, REACH Regulation (EC) No. 1907/2006). Senseca presupposes that the Supplier is aware of and will comply with obligations under these regulations. Therefore, the Supplier must ensure the following:

- Provision of correct, full and complete material data sheets must be guaranteed free of charge and must be provided for new and modified samples. Incorrect material data sheets will be rejected and must be corrected promptly.
- Registration, non-approval and notification of substances: The Supplier must ensure that substances, substances in preparations and substances in produce and products requiring registration are

only supplied to Senseca, if they have been registered for use at Senseca in accordance with Art. 5 and Art. 6 or Art. 7 para. 1 of Regulation 1907/2006/EC. The Supplier will likewise ensure, that substances in produce and products supplied for which notification is mandatory according to Art. 7(2) have been notified by the Supplier or - if the article was not manufactured or imported by the Supplier itself - was notified by an upstream supplier or, alternatively, that the substance has been registered for the intended use (Art. 7(6)). If substances subject to registration are not registered or substances listed in Annex XIV of Regulation 1907/2006/EC have not been approved for the contractually intended uses at the time of delivery or if notification required under Art. 7 Para. 2 is absent and is not in place, the Supplier is obliged to contact Senseca's REACH contact person directly: [einkauf@senseca.com](mailto:einkauf@senseca.com).

- Substances of very high concern (SVHCs) contained in components, spare parts, accessories and packaging: Insofar as delivered parts and components contain substances of very high concern (SVHCs) in a concentration greater than 0.1% by weight, which are published in the so-called Candidate List according to Art. 59 para. 1 of Regulation 1907/2006/EC, the contractor is obliged to provide all information according to Art. 33 para. 1 of Regulation 1907/2006/EC with the delivery, without prompting. This also applies if such a substance is only included on the Candidate List during the ongoing supply relationship. Information shall be provided in written form, preferably using IMDS (International Material Data System).

### 3. Compliance with air quality standards

In order to protect human health and the environment as a whole, it is of particular importance to tackle emissions of pollutants at source, and to identify and apply the most effective emission reduction measures at local, national and Community levels. Therefore, emitting air pollutants should be avoided,

prevented or reduced and appropriate air quality objectives should be established, taking into account relevant standards, guidelines and programmes of the World Health Organisation (WHO), as well as Directive 2008/50/EC of the European Parliament and of the Council.

#### **IV. Promoting standards in the supply chain**

The Supplier shall pass on contents of these sustainability provisions to its suppliers, will obligate them accordingly and check compliance with sustainability provisions in the supply chain.

#### **V. Responsible procurement of raw materials**

The Supplier commits to comply with sustainability in the spirit of statutory, economic and social responsibilities. One essential aspect of this behaviour is responsible procurement of raw materials. Within the scope of statutory provisions, the Supplier is obliged to trace and disclose the origin of its raw materials. For this purpose, the Supplier will provide Senseca with the latest revision of its CMRT report (Conflict Minerals Reporting Template) of the RMI - Responsible Mineral Initiative upon request.

#### **VI. Standards on privacy, confidentiality, information security and data protection**

The Supplier commits to comply with privacy, data protection, confidentiality and information security standards. The latest version of the policy can be found on the Senseca website.

All Suppliers and service providers commit, in particular to:

- not remove data media, papers, systems or files belonging to Senseca Germany GmbH from the company's premises without authorisation or written consent
- not transmit electronic information to third parties without authorisation



- consider classified information without authorisation to be confidential or classified
- report loss of data or information belonging to the company to Senseca Germany GmbH without delay.
- contact Senseca Group's security or Data Protection Officer immediately in the event of any ambiguities concerning information security.
- participate in the safety training offered, if necessary
- align their own service provision with requirements for information security
- obligate their own staff to relevant conditions and measures - especially with regard to information security and data protection
- only use devices that offer an appropriate level of security (virus protection, firewall, security updates, access protection, encryption if necessary).
- cooperate as far as necessary in encrypted transmission of information, and to support this technically and organizationally

#### **VII. Information on grievance procedures and protecting against retaliation measures for external persons and entities**

Senseca offers external persons or institutions the opportunity to report incidents of any kind. Incidents that violate or negatively impact statutory legal, contractual, normative or directly related aspects of this collaboration are subject to mandatory reporting.

You may use the following contact to report any incidents:

Purchasing Management

Telephone: +49 (0) 2191 967249

E-mail: [einkauf@senseca.com](mailto:einkauf@senseca.com)

#### **Senseca Germany GmbH**

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