



# 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. AktG (hereinafter referred to as "BLG LOGISTICS") on the behavior and actions of suppliers in their business activities. The requirements are considered to be 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, the legal requirements for corporate due diligence in supply chains, the relevant conventions of the International Labor Organization (ILO), and 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 and risk management and analyses. These include in particular 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 based on these.

BLG LOGISTICS strives 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 comply with these values. Behind this is the simple realization that responsible action and economic success are not mutually exclusive, but rather that they are beneficial to each other. We expect this understanding and attitude not only from all our employees, but also from our suppliers, their employees and their own suppliers.

BLG LOGISTICS' suppliers play a key role in shaping the Group's corporate success. Partnership based behavior creates sustainable business relationships that are

characterized by mutual benefit. Therefore, the Group 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.

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

## **2. Application and Scope**

The following sustainability requirements apply to all business relationships between BLG LOGISTICS and its suppliers, as far as they apply to the respective business activity.

## **3. Requirements for Suppliers**

### **3.1 Social Responsibility**

#### **3.1.1 Exclusion from 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 that 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 employees, such as psychological harshness, sexual or personal harassment.

#### **3.1.2 Prohibition of Child Labor**

Child labor is prohibited. Suppliers are required to comply with the recommendations of the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be less than the age at which general 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 complied with.

### **3.1.3 No Discrimination and Harrassemnt**

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. In particular, the Supplier shall not use private or public security forces if the Supplier has knowledge that such security forces, e.g. due to lack of suitability or instruction or control on the part of the security company, are subject to discrimination or harassment or other cruel, inhuman or degrading treatment or otherwise cause injury to life and limb.

### **3.1.4 Fair Compensation**

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

### **3.1.5 Fair Working Hours**

Working hours must comply with applicable laws or industry standards. Overtime is permitted only if it is worked 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. The weekly working time 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.

Workers' representatives shall be adequately protected against discrimination and against any differential treatment contrary to freedom of association which is connected with their employment. They shall be granted free access to the workplaces of their colleagues to ensure that they can pursue 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.

### **3.1.8 Ensuring basic human needs**

We expect our suppliers to refrain from harmful soil degradation, water and air pollution, harmful noise emissions or excessive water consumption if this damages the health of persons, significantly impairs the natural basis for the preservation and production of food or prevents the access of persons to safe drinking water or sanitary facilities.

### **3.1.9 Handling conflict minerals**

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 to serious human rights violations, including child and forced labor and slavery - and taking appropriate measures to mitigate them. This also includes ensuring that suppliers continuously work on transparency in the upstream supply chain up to raw material extraction, do not knowingly provide 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 must 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. We recommend certification in accordance with ISO 14001 or orientation according to this standard; energy management in accordance with ISO 50001 is preferred.

### **3.2.2 Resource Protection**

The use and consumption of any resources, including water and energy during production and handling, as well as the generated waste of any kind shall be re-use or avoided and re-use and re-cycling shall be increased.

### **3.2.3 Biodiversity, land use and deforestation**

Biodiversity, land use and deforestation are closely linked issues that have extensive impacts on the environment and the global ecosystem. BLG LOGISTICS pursues the goal of ensuring sustainable use of resources and biodiversity and expects its suppliers to do their part to achieve these goals by also protecting natural habitats and not contributing to deforestation and damage to natural forests and other natural ecosystems.

### **3.2.4 Dealing with Energy Consumption/efficiency; renewable Energies**

Energy consumption must be monitored and documented. Economic solutions must be found to improve energy efficiency and minimize energy consumption.

Suppliers are expected to increase the use of renewable energy and drive decarbonization.

### **3.2.5 Handling Waste and Hazardous Substances**

Suppliers follow a systematic approach to identifying and managing solid waste. They are also required to reduce waste, increase reuse and recycling rates, and dispose of waste responsibly. Chemicals or other materials that can be dangerous if 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 protect human health and the environment at all times.

### **3.2.6 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.

### **3.2.7 Dealing with 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 shall identify, control, monitor and reduce noise generated by their operations that exceeds noise 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 shall be followed. In addition, the applicable antitrust and competition laws must be applied, which, in dealing with competitors, especially prohibit 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 Protection**

Suppliers undertake to adequately meet the expectations of their clients, suppliers, customers, consumers and employees when protecting personal data. When collecting, storing, processing, transmitting and transferring personal data, they shall comply with the laws on data protection and information security and with the official regulations. The right of every individual to legal protection against such interference or impairment shall be respected.

### 3.3.3 Information Security

The information security objectives of confidentiality, integrity and availability must be complied with throughout the duration of the cooperation. For data provided to the supplier for the performance of services or generated during the performance of services, it also applies that the information security objectives must be ensured beyond the termination of the performance of services until the confirmed deletion or return of this data. Suppliers shall use and protect any information in an appropriate manner. Data shall be handled according to its classification. Suppliers shall ensure that sensitive data is properly collected, processed, secured and deleted. Suppliers shall commit their employees to maintain business secrets.

Confidential content may not be published, passed on to third parties or made available in any other form without authorization. The information security objectives and the responsibilities and security measures derived from them apply to the supplier's systems and the data stored at the supplier's premises that are required directly or indirectly for the provision of services. The supplier under contract is also responsible for the security measures at its subcontractors. The Supplier is responsible for establishing and exercising necessary measures to meet the information security objectives.

Responsibility includes:

- Compliance with legal, regulatory and contractual requirements and the resulting requirements and obligations,
- Maintaining the continuity of IT-supported workflows
- Reducing the damage and costs incurred in information security incidents,
- Securing the necessary knowledge to maintain the agreed service in times of emergency and crisis,
- Maintaining the confidentiality of data in an appropriate manner,
- Ensuring the quality, completeness and integrity of the data,
- Maintaining the availability of the data needed to operate the warehouse.

The technical-organizational measures for information security provided by BLG LOGISTICS shall be attached to all contracts with suppliers and implemented by the contractor as minimum requirements. Deviations must be coordinated between BLG LOGISTICS and suppliers and approved by the Legal, Insurance & GRC department.

#### **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. The supplier is strictly prohibited from producing plagiarized products in violation of intellectual property rights of third parties or BLG.

#### **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 of prohibiting all forms of bribery, corruption, extortion and embezzlement. Monitoring and enforcement procedures shall be in place to ensure compliance with anti-corruption laws. Likewise, ensure compliance with applicable anti money laundering regulations. 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 for the import and export of goods, services and information. They always observe the relevant sanctions lists.

#### **3.3.7 Respect for land, forest and water rights**

Suppliers shall strictly comply with all applicable laws regarding access and ownership of natural resources by third parties (in particular also indigenous peoples or other population groups). The supplier shall in particular respect valid land, forest and water rights. The supplier shall not participate in unlawful forced evictions or

other unlawful coercive measures. The Supplier may use land, forests and waters owned by a third party only on the basis of a lawful permit that regularly provides for adequate compensation of the owner for the use by the supplier.

#### **4. Training and Complaint Mechanisms**

Suppliers will provide regular training and education to their employees in order to communicate the requirements of this Code of Conduct to employees and enforce its requirements within the company.

Suppliers are responsible at the facility level for establishing an effective complaint 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 prompt 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 similar sanctions.

Suppliers must 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 above described requirements, as well as persons who have knowledge of a possible violation of a requirement described above, to point out this violation.

#### **5. Passing on Requirements to Subsequent Suppliers and Subcontractors**

The Supplier shall address this Code of Conduct to its suppliers and subcontractors. He will ensure that his suppliers and subcontractors also comply with the requirements of this Code of Conduct or comparable regulations that do not fall short of the level of protection provided by the regulations of this Code of Conduct.

## **6. Implementation of Requirements**

BLG LOGISTICS verifies compliance with the standards and regulations listed in this document by using 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' premises during normal business hours, either itself or through agents, after giving reasonable advance notice. Suppliers may object to individual audit measures if they would violate mandatory data protection regulations. The supplier shall make reasonable efforts to ensure that its suppliers and sub-contractors also grant BLG LOGISTICS and/or its agents corresponding audit rights.

If a supplier's violation of one of the specified requirements is such that it cannot end it in the near 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 must be considered when drawing up and implementing the concept:

- the preparation 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 supplier,
- joining forces with other companies within the framework of industry initiatives and industry standards in order to increase the possibility of influencing the perpetrator,
- temporary suspension of the business relationship while efforts are made to minimize the risk.

The effectiveness of the remedial measures must be reviewed by the supplier once a year and on an ad-hoc basis and proof provided to BLG LOGISTICS.

These requirements shall apply accordingly if suppliers become aware of a possible violation of the requirements described above at their own suppliers.

## **7. Point of Contact in Case of Misconduct**

In order to protect BLG LOGISTICS, its employees and business partners, 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 attach great importance to receiving corresponding information from our suppliers' business partners, their customers or other third parties.

For these reasons, it is possible to turn to the Compliance Officer or the ombudsperson of BLG LOGISTICS. The external lawyer appointed as ombudsperson is subject to BLG LOGISTICS' legal duty of confidentiality. He receives the information in strict confidence, examines it in advance and, with the consent of the whistleblower, forwards it in anonymous form to the Compliance Officer of BLG LOGISTICS if desired.

**Contact Options:**

<p><b>Stefan Häseker</b> Compliance-Beauftragter</p> <p>compliance@blg.de Tel.: +49 (0) 421-398 3785 Mob.: +49 (0) 151-543 52194</p>	<p><b>Nermin Varmaz</b> Vertreter</p> <p>nermin.varmaz@blg.de Tel.: +49 (0) 421-398 3156 Mob.: +49 (0) 151-118 32753</p>	<p><b>Rechtsanwalt Markus Klindwort</b> Ombudsperson</p> <p>Vertreter: Rechtsanwalt Christian Menges blg-ombudsmann@rmk-partner.de Tel.: +49 (0) 421-3339 2266</p>
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**8. Legal Consequences in Case 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 with the supplier, also without notice, depending on the severity of the violation.

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 steps.

It is in the full discretion of BLG LOGISTICS to avoid such consequences and to take alternative measures in their place if the supplier can credibly assure and prove that immediate countermeasures have been initiated to prevent future similar violations.

**9. Knowledge and Agreement of the Supplier**

Suppliers undertake to act responsibly and to comply with the principles / requirements listed.

## 10. Validity

The code of conduct published on the BLG LOGISTICS website at <https://www.blg-logistics.com/agbo> shall apply. The supplier is obliged to regularly check on the BLG LOGISTICS website whether an update of the Code of Conduct has been published.