



Dated 08.03.2021

Suppliers Code of the Planatol Group

Preface

Our Supplier Code is derived from the Code of Conduct of the Blue Cap - Group as well as the supplementary guidelines of Planatol (Planatol GmbH including the subsidiary Planatol System GmbH). It is not static, but is continuously developed and adapted to the ever-changing legal and economic conditions to which the Planatol Group is subject.

As a subsidiary of the Blue Cap Group, all guidelines and codes of the Planatol Group are subordinate to those of the parent company, Blue Cap AG.

Planatol achieves economic success with honesty, integrity and strict compliance with applicable laws. Sustainable and socially responsible business practices are therefore the basis of our business and the foundation of good and long-term business relationships.

This Code defines the demands that Planatol places on itself, but also on suppliers and service providers. Our suppliers and service providers undertake to comply with at least comparable standards and ensure that their bodies, employees, suppliers, intermediaries, subcontractors and other business partners also comply with at least comparable standards.

Gender clause

For reasons of better readability, the language form of the generic masculine is used. It is pointed out at this point that the exclusive use of the masculine form is to be understood as gender-independent. However, this is in no way intended to express gender discrimination or a violation of the principle of equality.

Compliance with laws and legal regulations

Planatol is obligated to comply with laws and legal regulations. We therefore also expect our business partners to place compliance with laws and legal regulations above profit interests and to ensure this throughout the supply chain.



Fair business practices with integrity

Competition and antitrust law

Planatol expects its suppliers and service providers to act fairly and responsibly in the market and to commit themselves without restriction to compliance with the applicable competition and antitrust laws. Suppliers and service providers do not participate in agreements or arrangements with other companies that are contrary to competition or antitrust law and that have the purpose or effect of restricting or preventing competition.

Corruption and bribery

Suppliers and service providers ensure that business relationships are based solely on objective criteria. In addition to quality, reliability and competitive prices, these include compliance with ecological and social standards as well as the principles of good corporate governance. Suppliers and service providers undertake to ensure that gifts, invitations and donations are granted in accordance with

the respective internal guidelines that regulate this area internally with regard to appropriateness, approvals, reporting channels and documentation. Suppliers will also comply with relevant country-specific anti-bribery and anti-corruption laws and regulations. Corruption will not be tolerated in any form, whether as bribery, corruption, acceptance of benefits, granting of benefits or any other form of undue influence. Planatol recognizes that reasonable and appropriate gifts, etc., can promote goodwill in business relationships. However, they should be socially appropriate, reasonable and non-cash. Any direct or indirect gratuity or acceptance of gifts, invitations or similar towards business partners in direct connection with the procurement, awarding, delivery, processing and payment of orders is prohibited. Gifts etc. to employees of Planatol should comply with the Anti-Corruption Policy and the Grants Policy, which are available at <https://www.planatol.de/compliance>.

Conflicts of interest

Planatol expects the employees of its suppliers and service providers to act exclusively in the interests of its company and always to keep private or their own economic interests separate. Even in business relationships with third parties, only objective criteria count for suppliers.

Fair and appropriate working conditions

Respect for human rights

Planatol expects its suppliers and service providers to uphold and respect the applicable regulations for the protection of human rights. They are an integral part of corporate responsibility. In particular, a supplier's employees respect the dignity and personal rights of every other employee and colleague, as well as third parties with whom the company has a business relationship.

Health and occupational safety

Suppliers and service providers shall ensure safe and hygienic working conditions that comply with the applicable legal requirements in the area of occupational health and safety. An appropriately safe and healthy working environment must be ensured in order to prevent accidents and damage to health. This also includes appropriate controls, safe work processes, preventive maintenance and protective measures as well as precautionary measures (e.g. instructions, guidelines, training, emergency plans including reporting procedures) against accidents and occupational diseases.

If hazards cannot be adequately controlled and prevented by the above measures, the supplier/business partner is obliged to equip its employees with suitable protective clothing. Furthermore, it must be ensured that all employees are informed and trained on this subject.



Working conditions and social standards

Suppliers and service providers shall comply with applicable labor laws and international standards in their respective countries. Compensation paid to employees, as well as benefits, shall at a minimum comply with all applicable laws on wages and benefits, including provisions on minimum wages, overtime, legally defined benefits, working hours, and paid vacations. The supplier/business partner is expected to pay its employees regularly and on time. No illegal or unauthorized deductions from wages may be made as a punitive measure. In cases where minimum legal wages or minimum industrial standards do not cover the cost of living, the supplier/business partner will be required to pay its employees adequate compensation to cover these basic needs.

Prohibition of discrimination, equal treatment

Discrimination, harassment, belittlement or disadvantage on the basis of race, origin, gender, disability, skin color, sexual orientation, political and religious conviction, age or ideology are prohibited. Every individual is entitled to fair and respectful treatment. Factually unjustified and impermissible unequal treatment is not to be tolerated. The principle of equal opportunity must be observed.

Forced Labor and Child Labor

Planatol expects that suppliers and service providers will not use child labor or any form of involuntary, forced or coerced labor, including prison labor, slave labor or labor related to human trafficking, in connection with providing goods or services to or for Planatol. Suppliers/service providers are expected to treat their employees fairly, free from sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse, and without threat of such treatment. We also expect third parties not to knowingly do business with individuals or companies that use child labor or forced labor in connection with goods or services supplied to or for Planatol. Furthermore, the supplier/service provider is required not to delegate hazardous work to employees under the age of 18. Hazardous work is work in which there is an increased risk from the work process, the type of activity, the substances used or the environment because adequate protective measures cannot be implemented.

Social dialogue, freedom of association and right to collective bargaining

In accordance with the law, suppliers and service providers respect the freedom of association and thus the right of all employees to form or join trade unions, form works councils, elect employee representatives, engage in collective bargaining, etc. Employees and their representatives must not suffer any personal or professional disadvantages as a result of exercising these rights.

Environmental protection and sustainability

In connection with all aspects of its business activities, Planatol expects suppliers/service providers to comply with all applicable laws and regulations designed to protect the environment and to maintain current and proper licenses, permits and registrations to the extent required for their operations. It is also expected that environmental impacts will be minimized and continuous measures will be taken to improve environmental protection. Planatol considers the supplier/service provider to have

systems in place to ensure safety in the handling, transportation, storage, etc. of waste, exhaust and wastewater. Burdens with negative effects on the health of people and/or the environment and climate must be handled, measured, controlled and already minimized or eliminated at the point of origin or through various processes in an appropriate manner.



Quality and product safety

Planatol expects its suppliers/service providers to comply with the generally recognized or contractually agreed quality requirements for the products. The supplier/business partner is expected to implement programs to control and maintain work processes in accordance with the safety standards and, if necessary, to carry out risk analyses and precautionary measures. The supplier/business partner is obliged to provide Planatol with product safety sheets containing all safety-relevant information upon request. The supplier is therefore obliged to keep transparent and up-to-date books and records to prove the use of the relevant materials and services as well as compliance with governmental and industry-wide regulations.

Data protection and data security

Confidential information is one of the most valuable assets. Company and business secrets must not be disclosed to third parties without authorization or even made public. The protection of the intellectual property of third parties must be respected. Our suppliers therefore protect all Planatol company information as well as information from and about other Planatol business partners and treat it confidentially.

The preservation of informational self-determination and the protection of privacy as well as the security of data processing are important legal concerns. The suppliers/service providers therefore take all necessary precautions to ensure that the collection, processing and use of personal data is carried out transparently, for the intended purpose, comprehensibly, carefully and in compliance with the applicable legal provisions of data protection law.

The suppliers/service providers of Planatol are obligated to ensure an appropriate standard in the protection of information processing, so that confidentiality, integrity and verifiability of the information worthy of protection are ensured and unauthorized use is prevented.



Trade control

In the global context, Planatol is obliged to ensure compliance with the respective applicable export, customs and tax laws. Our suppliers are therefore obliged to comply with the respective applicable regulations regarding import, export and transfer of goods, technologies, services as well as capital and payment transactions. Trade prohibitions and restrictions must be observed. The relevant permits must be obtained for dual-use goods. The applicable current regulations in connection with money laundering and terrorist financing must be complied with.

Financial integrity

Planatol expects suppliers and service providers to maintain proper and accurate accounting records and financial documentation relating to transactions, expenses and other business activities associated with Planatol in accordance with applicable accounting principles, laws and regulations. We further expect that reasonably detailed supporting documentation will be maintained and that they will provide such documentation upon Planatol's request.



Review and sanctions

Planatol is entitled to verify compliance with this Code of Conduct by the supplier/service provider at any time in accordance with the respective applicable law, for example by requesting information or by inspecting certificates.

For Planatol, compliance with the requirements set out in this Code of Conduct is an essential part of its contractual relationships. We therefore reserve the right to demand remedial action in the event of a violation of this Code of Conduct and, if necessary, to terminate the contractual relationship with the supplier/service provider extraordinarily or to terminate the cooperation with the supplier/service provider.

The supplier/service provider shall inform Planatol immediately of any violations on the part of its subcontractors against the above regulations. The supplier/business partner shall implement and/or use processes to identify, determine and monitor risks addressed in this Code, laws and regulations, contractual agreements and standards.

The German edition of the guideline in its currently valid version shall be applicable. This translation is for orientation purposes only.