

# SUPPLIER CODE OF CONDUCT

<b>1. FOREWORD</b> .....	<b>2</b>
<b>2. SCOPE</b> .....	<b>2</b>
<b>3. ETHICS</b> .....	<b>2</b>
3.1 Integrity .....	2
3.2 Corruption, bribery & gifts .....	2
3.3 Transparency .....	3
3.4 Human rights .....	3
3.4.1 Freely chosen employment .....	3
3.4.2 Child labor.....	3
3.4.3 Discrimination .....	3
3.4.4 Fair treatment .....	3
3.4.5 Freedom of association.....	3
3.4.6 Data protection and IT security .....	3
<b>4. ENVIRONMENT</b> .....	<b>3</b>
4.1 Sustainable action.....	3
4.2 Waste and emissions .....	4
<b>5. HEALTH &amp; SAFETY</b> .....	<b>4</b>
5.1 Occupational health and safety.....	4
5.2 Emergency preparedness and response .....	4
5.3 Hazard information .....	4
<b>6. DEALING WITH EMPLOYEES</b> .....	<b>4</b>
6.1 Fair working conditions and employee development .....	4
<b>7. MANAGEMENT SYSTEMS</b> .....	<b>5</b>
7.1 Legal and customer requirements.....	5
7.2 Documentation .....	5
7.3 Audits .....	5
<b>8. WHISTLEBLOWER SYSTEM</b> .....	<b>5</b>
<b>9. CONTACT</b> .....	<b>5</b>

## 1. Foreword

Dear Suppliers,

The ZETA Group (hereinafter referred to as "ZETA") embodies the spirit of innovation and sustainable corporate development. Our corporate policies prioritize sustainability in terms of business, the environment, and social interactions. Our aim is to act responsibly in order to ensure the long-term success of our company.

In addition to clearly striving for success, ZETA's corporate culture focuses on the company's willingness and ability to accept new challenges, to explore new fields, and to take a long-term perspective.

The demands of supplier management are no longer limited to functioning in a globally networked world. Modern technologies rely on raw materials which are often sourced from critical regions of the world. Their impact on supply chains is only enhanced by the consequences of climate change and increasing resource scarcity.

ZETA is overcoming these challenges by considering sustainability in its procurement and supplier management; ZETA regards sustainable procurement as a core issue.

The core principles comply with national and international laws, principles and conventions, such as in particular the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the relevant conventions of the International Labour Organization (ILO).

In order to focus more strongly on these values, in addition to actively communicating with you as a supplier and depending upon your support in the downstream supply chain, we also expect you to conduct the respective monitoring and checks.

Only by working together can we master the challenges that tomorrow brings.

The Supplier Code of Conduct describes the mandatory set of values and principles of conduct upon which ZETA's global cooperation with suppliers is based.

This is why ZETA requires that you, as a supplier, accept responsibility for adhering to this Code of Conduct, and that you will help all of your employees and suppliers to do the same.

## 2. SCOPE

This Code of Conduct applies to all natural or legal persons who sell or provide products, goods, works or services to ZETA either themselves or through third parties, e.g. affiliated companies, distributors, subcontractors, agents (hereinafter "Supplier").

## 3. Ethics

Suppliers must conduct their business in an ethical manner and act with integrity in compliance with the following points:

### 3.1 Integrity

Integrity means that ZETA's business practices are in line with the company's values and principles of conduct at all times. ZETA therefore requires its Suppliers to comply with applicable law and to adhere to the values and principles of conduct defined herein.

### 3.2 Corruption, bribery & gifts

Suppliers undertake to prohibit corruption, extortion, embezzlement, misappropriation and money laundering in any form and shall not engage in or tolerate such practices. Suppliers are not allowed to offer or accept bribes or other unlawful inducements (e.g. kickbacks) in dealings with business partners or public officials. Suppliers are not allowed to offer ZETA employees gifts or other benefits for personal gain that could be considered a bribe. As a general rule, gifts or entertainment must not be used to unfairly influence a business relationship and must not violate applicable laws or ethical standards.

### **3.3 Transparency**

ZETA is a fair and reliable partner. ZETA and its employees are therefore committed to full transparency towards its Suppliers. Because transparency creates trust and trust is the basis for successful cooperation in the supply network. We also hold our Suppliers to the same standards.

Responsible cooperation means all our actions and decisions must be transparent and comprehensible. This is a prerequisite for achieving the necessary acceptance. Transparency in cooperation also means addressing issues openly and dealing with each other honestly.

### **3.4 Human rights**

Suppliers undertake to respect and uphold human rights without exception.

#### **3.4.1 Freely chosen employment**

Suppliers must not use forced, indentured or bonded labor or involuntary prison labor. Employees must not be forced to pay for work or be denied freedom of movement.

#### **3.4.2 Child labor**

Suppliers are prohibited from using child labor. Young workers under 18 years of age may only be employed for non-hazardous work and only if they are over the legal age for employment or completion of compulsory education applicable in the respective country.

#### **3.4.3 Discrimination**

Suppliers must provide a workplace free of discrimination. There shall be no discrimination on the basis of race, color, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, trade union membership or marital status.

#### **3.4.4 Fair treatment**

Suppliers undertake to provide a workplace free from actual or threat of harassment, harsh and inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

#### **3.4.5 Freedom of association**

ZETA encourages open communication and direct engagement with employees to resolve workplace and compensation issues. Suppliers shall respect the right of employees to associate freely, join or not join trade unions, seek representation and join works councils in accordance with local laws. Employees must be able to openly discuss working conditions with management without threat of reprisal, intimidation or harassment.

#### **3.4.6 Data protection and IT security**

Suppliers shall comply with applicable privacy and data protection laws and ensure the protection, security and lawful use of personal data. Commercial and technical information provided by ZETA shall be kept and stored securely with appropriate access controls. Confidential information of ZETA may only be disclosed with written consent or prior agreement.

## **4. Environment**

Suppliers must act in an environmentally conscious and efficient manner to minimize negative impacts on the environment. Suppliers are encouraged to conserve resources, avoid the use of hazardous materials and consider reuse and recycling. The environmental elements include:

### **4.1 Sustainable action**

Sustainability is firmly rooted in ZETA's values and actions. Sustainable value creation is based on the triad of economic, ecological and social responsibility. This includes both products and their production together with the associated processes, services and supply chains. ZETA therefore addresses sustainable action as a cross-cutting issue and takes a holistic view.

ZETA requires Suppliers of products, processes and services to comply with all applicable local/regional and international legislation on human rights, health, safety and environmental protection, and to actively promote sustainable business management. The focus must be on early prevention, e.g. by using renewable energies and minimizing pollution or waste. Special attention must be paid to the handling of so-called conflict minerals and critical minerals and materials in general; in this case, Suppliers need to consider the whole supply chain and meet additional requirements in terms of transparency and cooperation to ensure greater responsibility and care.

## **4.2 Waste and emissions**

The Supplier shall keep the environmental impact of its business activities to a minimum and actively implement measures to promote environmental protection. ZETA expects its Suppliers to acknowledge and adhere to all applicable local and international environmental standards and laws. The Supplier shall maintain environmental responsibility across the supply chain, including both products and packaging. The aim is to avoid or continuously reduce the environmental impact of resource and energy consumption, emissions of greenhouse gases and air pollutants, water consumption, releases into soil and water as well as the resulting waste, in order to preserve biodiversity and to promote a circular economy.

## **5. Health & Safety**

Suppliers must provide a safe and healthy working environment, and where applicable, this must also apply to accommodation provided by the Supplier. The health and safety measures also apply to contractors and subcontractors on Supplier sites. The health and safety elements include:

### **5.1 Occupational health and safety**

Suppliers shall protect employees from excessive exposure to chemical, biological, physical hazards and physically demanding tasks at the workplace and in accommodations provided by the company. Suppliers shall ensure adequate order and cleanliness and provide employees with access to clean drinking water.

### **5.2 Emergency preparedness and response**

Suppliers shall identify and regularly assess emergency situations in the workplace and in any accommodation provided by them. They undertake to minimize the impact of such situations by putting in place emergency plans and response procedures and shall provide appropriate evidence if requested by ZETA.

### **5.3 Hazard information**

Safety information relating to hazardous substances, including pharmaceutical agents and pharmaceutical intermediates, must be available for employee training and instruction and to protect workers from hazards.

## **6. Dealing with employees**

Suppliers must ensure that their employees are treated fairly and must meet all required standards.

### **6.1 Fair working conditions and employee development**

ZETA requires its Suppliers to pay their workers the legally guaranteed minimum wages in the respective labor markets and to comply with all applicable labor regulations/laws, in particular with regard to working hours. Recruitment fees must not be charged to the employee in any way.

Suppliers are prohibited from engaging in misleading or deceptive practices in the recruitment process. They are not permitted to make false statements about working conditions, including wages and fringe benefits, the place of work, living conditions, the hazardous nature of the work, accommodation and related costs (if provided or arranged by the employer or an intermediary).

Employment documents must be in writing and contain a detailed understandable description in the language spoken by the future employee, and must be made available in good time.

Employees' identity documents must not be withheld, tampered with or destroyed. Any accommodation provided by the employer must meet the minimum standard of the country where the work is being carried out. Suppliers should also develop their employees based on their individual skills and professional and personal interests, ideally aligning the company's interests with the employee's individual needs.

## **7. Management Systems**

Suppliers shall implement appropriate management systems to maintain business continuity, enable continuous improvement, and support the fulfillment of the above principles.

### **7.1 Legal and customer requirements**

Suppliers must be aware of and comply with all applicable international, national and local laws and regulations, contractual agreements and international standards. They must also align their practices with generally accepted industry standards, obtain and keep current all applicable permits, certificates, licenses and approvals, and conduct their operations at all times in accordance with the associated restrictions and requirements.

Suppliers shall comply with the principles set forth in this Code of Conduct by providing appropriate resources within their companies and by incorporating all applicable principles into policies and procedures.

### **7.2 Documentation**

Suppliers shall develop, implement, apply and maintain management systems and controls related to the content of this Supplier Code of Conduct and provide the necessary documentation to demonstrate compliance with the principles set out herein.

### **7.3 Audits**

ZETA reserves the right to conduct audits to verify compliance with the above points upon prior notice.

## **8. Whistleblower system**

Violations of the Code of Conduct in connection with ZETA's business operations can be reported via ZETA's 24/7 whistleblower system. The system is available in multiple languages, confidentially, and anonymously if required. Reports can be made to:

<https://www.zeta.com/de/compliance.html>

## **9. Contact**

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