

Supplier Code of Conduct

Version: 20.02.2025

1. Introduction

This Code of Conduct for Suppliers is based on the Code of Conduct of the BERNSTEIN Group (as of 03.09.2024), national laws and international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights and the International Labor Standards of the International Labor Organization.

The Code of Conduct sets out BERNSTEIN's expectations of suppliers and the commitments they make to BERNSTEIN.

2. Compliance

BERNSTEIN suppliers comply with all relevant laws, ordinances and official regulations in their working environment.

3. Anti-Corruption

No tolerance of any form of bribery, corruption, embezzlement or extortion.

No acceptance or offer of benefits with the intention or appearance of influencing business decisions or gaining any other improper advantage.

4. Antitrust and competition law

Compliance with all applicable national and international trade laws and regulations, including antitrust and trade control regulations.

In our business relationships, we do not promise, offer, grant, demand or accept any benefits that are or could appear to be intended to influence business decisions or to gain any other improper advantage.

5. Gifts and invitations

Gifts, invitations and other benefits from suppliers or their representatives to BERNSTEIN employees must be kept within socially acceptable, appropriate and transparent limits.

Suppliers may not offer, promise or grant BERNSTEIN employees any personal advantages which, according to objective assessment, are likely to have an unfair influence on business conduct.

6. Prevention of money laundering and terrorist financing

Suppliers of BERNSTEIN do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

7. Conflicts of interest

Avoidance of conflicts of interest by making business-related decisions on the basis of objective criteria and not on the basis of private interests or relationships.

8. Protection of internationally human rights

a. Prohibition of forced labour

No direct or indirect involvement in modern slavery, forced or compulsory labor or human trafficking.

No use of labor as a punitive measure or as a means of ideological or political discrimination.

No depositing of identity documents as a labor pledge and freedom of dismissal after reasonable notice.

b. Prohibition of child labour

No hiring of employees who cannot prove that they are at least 15 years old (14 years old in exceptional cases). Specific national legislation may set the minimum age of employees higher (e.g. 16 years).

No physically dangerous work or night work by employees under the age of 18.

c. Non-discrimination and respectful treatment

Treating all employees with respect and providing a work environment in which harassment, abuse, harsh or inhumane treatment, unlawful practices and discrimination have no place.

Observance of the prohibition of unequal treatment of employees, e.g. on the basis of age, disability, origin, gender, ideology, political or trade union activity, religion or sexual orientation.

d. Freedom of association

Recognition of the right of employees to form trade unions, join existing trade unions and the freedom to bargain collectively.

e. Working hours and remuneration

Compliance with the minimum wages and working hours stipulated by applicable law and remuneration in accordance with local standards. No application of wage deductions as disciplinary measures. If local law permits deviating regulations, the statutory provisions of the respective country shall apply.

f. Health and occupational safety

Protecting the health of employees by complying with applicable health and safety laws.

9. Environmental Protection

Suppliers must comply with all applicable environmental laws and regulations and undertake to reduce environmental pollution in an appropriate manner.

Reduce the emission of pollutants and greenhouse gases (especially CO₂) into the air, soil and water pollution and noise emissions.

To increase energy efficiency as much as possible, use renewable energies and reduce water consumption. Suppliers are also expected to work on the continuous improvement of their environmentally relevant processes and ideally document this by providing evidence of suitable management systems for environmental protection (e.g. ISO 14001).

10. Data protection and information security

When collecting, storing, processing, transmitting and passing on personal information, all relevant laws and regulations on data protection and information security must be complied with.

BERNSTEIN suppliers shall protect confidential information and respect intellectual property.

The transfer of technology and know-how must be carried out in such a way that BERNSTEIN's intellectual property rights, trade secrets and non-public information are protected.

11. Supply Chain

The requirements of this Code of Conduct apply to the entire supply chain. BERNSTEIN suppliers must also impose appropriate obligations on their upstream supply chain.

12. Verification of compliance

In order to ensure that our supply chain actually complies with these important requirements, BERNSTEIN may conduct audits, e.g. by means of questionnaires or on-site audits carried out either by BERNSTEIN or by independent service providers.

BERNSTEIN shall be entitled to conduct such audits once a year or for specific reasons to verify compliance with the Code of Conduct at the supplier's premises during normal business hours and with reasonable advance notice.