



wintershall dea

WINTERSHALL DEA

# SUPPLIER CODE OF CONDUCT

Wintershall Dea is a leading European independent gas and carbon management company. Our aim is to assume responsibility and, within our sphere of influence, to efficiently and responsibly contribute to covering the world's growing energy needs. This aim involves complying worldwide with applicable laws and internationally recognised standards. In addition, through our Wintershall Dea Code of Conduct we have set ourselves binding corporate values and standards for acting responsibly

We want to partner with our suppliers to further develop the sustainability performance in our supply chain. The Supplier Code of Conduct therefore defines binding requirements for both sides for our joint business relationship. We expect you as our suppliers to comply with applicable laws and to support, embrace and enact the following sustainability standards. These are based on the Ten Principles of the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights and the United Nations Sustainable Development Goals. We also expect you to make every effort to ensure that these sustainability standards are implemented by your suppliers, subcontractors and other business partners.

## Environment, Health and Safety

- › You shall comply with all applicable environmental, health and safety regulations, including but not limited to the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants, and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal.
- › You shall minimise potential environmental, health and safety risks that might result from your business operations by using appropriate management systems.
- › You shall promote the safe and environmentally-friendly development, manufacture, transport, use and disposal of your products. The same applies to the provision of services.
- › You shall design your processes in such a way that the resources involved are used efficiently. You use especially energy-efficient and environmentally-friendly technology and reduce your water consumption and the amount of waste that you produce as well as the emissions that you release into the air, water and land.
- › You shall avoid or minimise undesirable effects of your activities on the environment and the climate.
- › You ensure appropriate instruction, training and control of private or public security forces if hiring them.

## Social Responsibility

- › You shall respect human rights set out in the International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO core labour standards as well as the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- › You shall implement processes to identify actual and potential human rights violations (also with regard to your business relationships with third parties) and take appropriate countermeasures.
- › You shall not tolerate child labour, in other words, activities by minors that are harmful to their health and development. You do not employ any minors in disagreement with the applicable legislation and in no event under the age of 15. You grant special protection to minors.

- › You shall tolerate neither human trafficking nor any form of forced labour, in other words, involuntary work or service performed with the threat of coercive measures. This also covers practices of modern slavery as situations of exploitation which a person is unable to leave on their own due to threats, violence, coercion, deception and/or abuse of power.
- › You shall uphold – in accordance with applicable laws – the freedom of association, the right to collective bargaining, reasonable working hours and paid holidays, as well as proportionality in disciplinary measures, with physical punishment being forbidden.
- › You shall comply with minimum wages in accordance with local laws and ensure compensation of a living wage in line with the local living conditions.
- › You shall treat your employees with respect and provide a workplace that is free from harassment or abuse of any kind and from unlawful practices or discrimination. That applies especially to unfair treatment on the grounds of nationality or ethnic origin, gender or gender identity, religion or beliefs, a disability, age or sexual orientation and identity.
- › You shall respect the rights of local communities, minorities, indigenous people and other vulnerable groups and strive to avoid any negative impact on them.
- › You shall comply with the prohibition of unlawful eviction or taking of land, forests and waters.

## Governance

- › You shall abide by all applicable national and international laws and regulations, including but not limited to antitrust law, trade controls and sanction regimes.
- › You shall ensure the protection of insider information so that information received within your business relationship with Wintershall Dea that is not in the public domain cannot be used as the basis for trading in shares and securities.
- › You shall respect the privacy and confidential information of your employees and business partners as well as protect data and intellectual property from misuse.
- › You shall prohibit all kinds of bribery, corruption and money laundering.
- › You shall forbid any benefits (gifts, entertainment, invitations or other benefits) to or from private business partner or public officials that aim to influence business decisions or otherwise encourage them to act contrary to their obligations or against the law.
- › You shall ensure that decisions in connection with the business relationship with Wintershall Dea are made exclusively on the basis of objective criteria and not guided by personal interests that may lead to a conflict of interests, and shall inform Wintershall Dea should such a conflict of interests exist.
- › You shall implement an appropriate compliance management system that supports compliance with applicable laws and standards.

## Compliance with this Supplier Code of Conduct

You enable your employees or third parties to openly or confidentially report concerns, misconduct or potentially unlawful practices in connection with your business activities. You carry out investigations based on the reports and take appropriate measures.

The standards set out in this Supplier Code of Conduct are an important part of our supplier selection and evaluation. You shall acknowledge standards stated above and demonstrate your commitment via compliance with your own code of conduct or company policies that embrace these standards. Wintershall Dea reserves the right to conduct audits or assessments itself or have them carried out by a third party to ensure your compliance. Furthermore, in case of non-compliance by a supplier with these or comparable principles and standards Wintershall Dea reserves the right to reassess whether to continue the business relationship. Such a decision may include the termination of the business relationship.

If you or your employees have any concerns about unlawful conduct or misconduct, please contact our whistleblower system: <https://www.speakupfeedback.eu/web/pha6ek>.

More information is available at: <https://wintershalldea.com/en/what-we-believe/compliance>.

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