

Supplier letters of compliance with laws, directives and voluntary codes (July 2021)

The following sustainability provisions define standards and requirements of Helbako GmbH to its suppliers:

- compliance with internationally recognized human and employee rights,
- the outlawing of child labour and forced labour,
- Compliance with and promotion of business ethical conduct and adherence to legal standards and environmental guidelines as well as
- preventive environmental protection.
- Promotion of standards in the supply chain
- Privacy, confidentiality, information security and data protection standards
- Information on complaint procedures and protection against retaliation

The sustainability provisions are based, among other things, on internationally recognized principles of the United Nations Global Compact (<http://www.unglobalcompact.org>) and the International Labour Standards of the International Labour Organization (<http://www.ilo.org>).

Supplier agrees to comply with the following standards:

I. Standards on working conditions/personnel

1. Wages and benefits, working hours

Compensation and benefits must be guaranteed in accordance with the basic principles on minimum wages, overtime and legally prescribed social benefits. Working hours must comply with applicable laws, industry standards or relevant ILO conventions. Overtime should only be required to be worked voluntarily and employees must be granted at least one day off after 6 consecutive working days.

2. Avoidance of child labor

The supplier warrants on behalf of his company that the production or processing of the products to be delivered is or has been carried out without exploitative child labor within the meaning of ILO Convention No. 182, as well as without violations of obligations resulting from the implementation of this Convention or from other applicable national or international regulations to combat exploitative child labor. Furthermore, the Supplier warrants that his company, his suppliers and their subcontractors have taken active and targeted measures to exclude exploitative child labor within the meaning of ILO Convention No. 182 in the manufacture or processing of the products to be delivered. The supplier is obliged to commit his subcontractors accordingly and to carry out control measures in this respect.

3. Free choice of employment

The supplier shall not employ or force anyone to work against their will. Employees must be free to terminate the employment relationship with reasonable notice. Employees must not be required to hand over their ID, passport or work permit as a precondition for employment.

4. Freedom of association

Workers must be able to communicate openly with management about working conditions without fear of reprisal in any form. They must have the right to join together, to join a union, to appoint representation and to be elected to such representation.

5. Health and safety

As an employer, the supplier ensures occupational safety and health protection in the workplace within the framework of national regulations and supports continuous development to improve the working environment.

II. Business Ethics Standards

1. Anti-corruption and compliance

Within the scope of business activities with HELBAKO the supplier is obliged to refrain from anything which may lead to criminal liability due to fraud or breach of trust, insolvency offences, offences against competition, granting of advantages, bribery, corruptibility or other corruption offences of persons employed by the supplier or other third parties. In the event of a violation of the above, HELBAKO shall have the right to rescind or terminate all existing legal transactions with the supplier without notice and the right to break off all negotiations. Notwithstanding the above, the supplier is obliged to comply with all laws and regulations applicable to him and to the business relationship with HELBAKO.

2. Prohibition of discrimination

Discrimination against employees in any form is not permitted. This applies to discrimination based on, for example, gender, race, caste, skin color, disability, trade union membership, political conviction, origin, religion, age, pregnancy or sexual orientation.

3. Safety and quality

All products and services must meet the contractually specified quality and safety criteria upon delivery and be safe to use for their intended purpose.

III. General environmental standards and environmental compatibility

1. General environmental responsibility, environmentally friendly production and products

HELBAKO is committed to integrated environmental protection that addresses the causes, assesses the effects of production processes and products on the environment in advance, and incorporates them into corporate decisions. In doing so, products and production are designed to be as resource-saving and environmentally compatible as possible from a holistic point of view.

The supplier will act in accordance with the precautionary principle with regard to environmental protection, take initiatives to promote greater environmental responsibility, and encourage the development and dissemination of environmentally friendly technologies. It will ensure a high level of environmental protection at all stages of production. This will include a proactive approach to prevent or minimize the consequences of accidents that may have a negative impact on the environment. The application and further development of water- and energy-saving technologies - characterized by the use of emission reduction, reuse and recycling strategies - is of particular importance. All products manufactured along the supply chain must comply with environmental protection standards

of their respective market segment. This includes all materials and substances used in production. Chemicals and other substances that pose a hazard if released into the environment must be identified. Hazardous substance management must be established for them so that they can be safely handled, transported, stored, reprocessed or reused and disposed of through appropriate procedures.

2. Preparation of recycling and disposal concepts for the delivered products

In connection with the End-of-Life Vehicles Ordinance, the supplier is obliged to ensure the following:

- Compliance with the VDA 260 labelling standards for materials and components.
- Highest possible recycled content in plastic components and use of renewable raw materials after consultation with HELBAKO.

3. Confirmation/compliance with substance bans

Substances which are subject to legal restrictions or prohibitions may only be contained in the delivered materials or parts in accordance with these regulations (e.g. Chemicals Prohibition Ordinance, End-of-Life Vehicles Ordinance, REACH Regulation (EC) No. 1907/2006). HELBAKO assumes that the supplier knows and will fulfill the obligations according to these regulations. Therefore the supplier must ensure the following:

- Provision of correct and complete IMDS material data sheets is to be ensured free of charge and must be provided for new and change samples. Incorrect material data sheets will be rejected and must be corrected promptly.
- Registration, non-registration and notification of substances: The supplier shall ensure that substances, substances in preparations and substances in articles requiring registration are only supplied to Helbako if they are registered for use at Helbako in accordance with Art. 5 and Art. 6 or Art. 7 para. 1 of Regulation 1907/2006/EC. He shall similarly ensure that substances in supplied articles for which notification is mandatory according to Art. 7 para. 2 have been notified by him or - if the article has not been manufactured or imported by him - by a pre-supplier or, alternatively, that the substance has been registered for the intended use (Art. 7 para. 6). If substances subject to registration are not registered or substances of Annex XIV of Regulation 1907/2006/EC are not authorized for the contractually intended uses at the time of delivery or if a notification required according to Art. 7 (2) is missing, the supplier is obliged to contact Helbako's REACH contact person immediately: einkauf@helbako.de.
- Substances of very high concern (SVHC) in components, spare parts, accessories and packaging: As far as the delivered parts contain substances to a proportion of more than 0.1% by weight of substances of very high concern (SVHC), which are published in the so-called candidate list according to Art. 59 para. 1 of the Regulation 1907/2006/EC, the contractor is obliged to provide all information according to Art. 33 para. 1 of the Regulation 1907/2006/EC with the delivery without being asked. This also applies if such a substance is only included in the candidate list during the ongoing supply relationship. The information shall be provided in written form, preferably via IMDS (International Material Data System).
- Confirmation of and compliance with the substance bans according to the End-of-Life Vehicles Ordinance (e.g. chromium (VI) freedom) in accordance with the agreed conversion scenarios.

4. Compliance with air quality standards

In order to protect human health and the environment as a whole, it is of particular importance to tackle emissions of pollutants at source and to identify and apply the most effective emission reduction measures at local, national and Community level. Therefore, emissions of air pollutants must be avoided, prevented or reduced and appropriate air quality objectives must be set, taking into account the relevant standards, guidelines and programs of the World Health Organization (WHO), as well as Directive 2008/50/EC of the European Parliament and of the Council.

IV. Promoting standards in the supply chain

The supplier shall pass on the contents of these sustainability provisions to its suppliers, oblige them accordingly and check compliance with the sustainability provisions in the supply chain.

V. Responsible procurement of raw materials

The supplier undertakes to comply with sustainability in the sense of legal, economic and social responsibility. An essential aspect of this behavior is the responsible procurement of raw materials. Within the scope of legal requirements, the supplier is obliged to trace and disclose the origin of its raw materials. For this purpose, he will provide Helbako with his CMRT report (Conflict Minerals Report) of the RMI - Responsible Mineral Initiative in its latest revision upon request.

VI. Privacy, confidentiality, information security and data protection standards

The supplier feels obliged to comply with standards of privacy, data protection, confidentiality and information security. The current policy can be found in its most recent version on Helbako's homepage.

All suppliers and service providers commit to this in particular:

- not to remove data carriers, papers, systems or files of HELBAKO GmbH from the company's premises without authorization or written consent
- not to transmit electronic information to third parties without authorization
- view information marked confidential or classified without authorization
- To report loss of data or information belonging to the company to HELBAKO GmbH without delay.
- to contact the security or data protection officer of HELBAKO GmbH without delay in the event of any ambiguities concerning information security.
- Participate, if necessary, in the safety training offered
- Aligning its own service provision with the requirements of information security
- Require its own personnel to comply with the relevant conditions and measures - in particular with regard to information security and data protection
- Only use devices that offer an appropriate level of security (virus protection, firewall, security updates, access protection, encryption if necessary)
- to cooperate as far as necessary in an encrypted transmission of information and to support this technically and organizationally

VII. Information on grievance procedures and protection against retaliation for external persons and entities

Helbako offers external persons or institutions the possibility to report incidents of any kind. Incidents that violate or impair legal, contractual, normative or directly related aspects of the cooperation are subject to mandatory reporting.

To report incidents, you can use the following contact:

Purchasing management

Phone: +49 (0) 2056 912 0

E-mail: einkauf@helbako.de