

Code of Conduct for Business Partners

Vector Informatik GmbH

Code of Conduct for Business Partners

Compliance with the law and contractual agreements and the commitment to ecological, social and economic responsibility are equally important fundamental principles of Vector's corporate governance. These principles are set forth for Vector employees in our Code of Conduct for Employees. We expect the same fundamental commitment from our business partners. This Code of Conduct for Business Partners therefore goes beyond mere compliance with the law. The cooperation between Vector and our business partners is based on the essential foundation of our mutual trust as well as on our Business Partners' compliance with the guidelines set out in this Code of Conduct. Business partners of Vector are any natural or legal persons providing services and deliveries, without being Vector employees or companies affiliated with Vector. The principles described here are based, inter alia, on the principles of the United Nation Global Compact, the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Vector Expects From Its Business Partners:

- > That you conduct your business with integrity and in accordance with the applicable legal and regulatory provisions, and that you accept and implement the guidelines and principles set out in this Code of Conduct;
- > That you regularly provide information on the processes established in your company to comply with the regulations contained in this Code of Conduct;
- > That you work to ensure and actively promote that your own business partners also comply with and promote the principles set out in this Code of Conduct;
- > That you take internal measures to remedy potential violations as soon as you become aware of them;
- > That you inform Vector without undue delay if you have reason to believe that the following guidelines and principles have been violated or are likely to be violated, by providing Vector with all the information it needs to comply with its legal obligations.

Respectful Treatment of Employees

Non-Discrimination

Our business partners will never tolerate discrimination or harassment of employees in the workplace or in the recruitment of new employees based on ethnic origin, skin colour, nationality, gender, age, political opinion, social background, marital status, disability, sexual orientation, religion or belief.

Human Trafficking and Forced Labour

Our business partners reject human trafficking and forced labour in any form and do not allow such practices in their company. They respect the principle of the free choice of employment.

Child Labour and Young Workers

Our business partners only employ persons who have reached the minimum working age under the applicable national legislation. They reject child labour and observe and respect the rights of children.

Health and Work Safety

Our business partners protect the health and safety of their employees. As a minimum, they abide by the relevant national laws on safety and hygiene at work, thereby ensuring healthy working conditions and a safe work environment.

Wages and Social Benefits

Our business partners pay remuneration and social benefits that at least meet national and local statutory standards, regulations or agreements.

Working Hours

Our business partners comply with the applicable regulations on working hours and holidays. Freedom of association and collective bargaining. Our business partners maintain an open and constructive dialogue with their employees and employee representatives. They respect the freedom of association and the right to form interest groups. They grant their employees the right to defend their interests in accordance with national legislation.

Protection Against Retaliation

Our business partners protect any employee from retaliation who reports potential misconduct or provides relevant information.

Deployment of Public and Private Security Forces

Our business partners ensure that they do not hire or use private security service providers if they disregard human rights.

Environmental Protection and Sustainability

Environmental Protection

Our business partners undertake to comply with all applicable national laws, regulations and standards on environmental protection. Our business partners furthermore undertake to conserve resources to the greatest extent possible, and to minimize environmental impacts and risks. This includes the establishment and ongoing development of its own production processes and sites to ensure that environmental impacts (e.g. from energy and water consumption, wastewater, improper land use, emissions of gas, noise and odours, waste and hazardous substances) are identified and systematically considered. Vector is committed to halting deforestation and the conversion of natural ecosystems in its supply chains. We expect our business partner to protect natural ecosystems and to not contribute to the alteration, deforestation and deterioration of natural forests and other natural ecosystems.

Animal Welfare & Biodiversity

Our business partners comply with applicable national regulations for the protection of animal and species diversity.

Rights of Local Communities

Our business partners do not engage in land theft. When acquiring, cultivating or otherwise using land, forests and waters, our business partners will comply with the prohibition of unlawful eviction from land, forests and waters.

Climate Protection

Our business partners engage in active and sustainable climate protection, for example by purchasing energy from renewable sources. The aim is to gain transparency on CO₂ emissions as well as clarity on our business partners' efforts regarding CO₂ reduction targets.

Energy Consumption

Our business partners monitor and document their energy consumption. They shall endeavour to find economic solutions to improve energy efficiency and to minimize energy consumption in the long term.

Water Consumption

Our business partners use water carefully. Water abstraction, especially in areas suffering from water scarcity, shall be minimized.

Air and Soil Quality

Our business partners shall comply at least with the relevant legal requirements and thus contribute to the preservation of air and soil quality. Waste and emissions

Our business partners use resources efficiently, employ energy-efficient and environmentally friendly technologies and reduce their waste volume as well as their emissions to the air, water and soil.

Responsible Chemicals Management

Our business partners identify and handle chemicals and other materials that pose a hazard when released into the environment so as to ensure safety when handling, transporting, storing, using, recycling, reusing and disposing of these substances.

Responsible Behaviour

Compliance With Laws and Agreements

Our business partners undertake to comply with applicable national and international laws, provisions and agreements at all times, to respect human rights and to protect human dignity.

Avoiding Conflicts of Interest

Our business partners make business decisions exclusively based on objective criteria and will not be guided by personal interests. Conflicts of interest, including those of relatives or otherwise related parties, shall be excluded. We expect our business partners to disclose potential as well as actual conflicts of interest and identify an appropriate response. Messages and notices can be sent to the email address below.

Corruption, Extortion and Bribery

Our business partners prohibit corruption, extortion and embezzlement in any form. No bribes or other unlawful payments or other benefits shall be offered or accepted.

Safeguarding Fair Competition

Our business partners compete fairly and observe the applicable anti-trust, contract and competition laws.

International Trade

Our business partners comply with all national and international trade regulations, customs, export as well as embargo regulations, to ensure that all applicable national and international sanctions and trade embargoes are observed. If necessary, any required measures shall be taken to avoid sanction violations.

Conflict Minerals

Our business partners ensure that products supplied to Vector do not contain metals derived from minerals or their derivatives which originate from conflict regions

where they directly or indirectly finance or benefit armed groups.

Anti-Money Laundering

Our business partners comply with the applicable legal provisions for the prevention of money laundering.

Protection of Intellectual Property

Our business partners comply with all applicable national and international intellectual property laws. In addition, our business partners ensure that they have all the necessary rights of use to avoid infringements of industrial property rights and the appropriation of other people's intellectual work (plagiarism).

Handling of Information

Trade and Business Secrets, Confidential Information and Data Protection

Our business partners shall ensure that internal and confidential information as well as trade secrets of the Vector Group and its customers are kept secret; the same applies for personal data of any kind. This obligation begins during the initiation of the business

relationship and continues after it ends. The information systems of our business partners which process, store and/or transmit the above-mentioned information shall be adequately protected in accordance with the state of the art against unauthorized access, unauthorized use, modification, disclosure and destruction. In this context, our business partners shall ensure their compliance with the law (e.g. GDPR) and implement the accepted standards for information security (e.g. VDA ISA, ISO/IEC 27000 series).

Use of Artificial Intelligence

Our business partners ensure compliance with applicable laws and regulations when developing and/or using artificial intelligence. In doing so, you follow an approach that ensures that people remain the pace setters of development.

Insider Information

Our business partners refuse to act based on insider information, to exploit such information or to make it available to third parties.

Compliance With This Code of Conduct

Our business partners shall communicate this Code of Conduct to third parties along their supply chain which are engaged in the fulfilment of the contractual relationship with Vector, they shall take the Code of Conduct into account in their selection of such third parties and shall endeavour to commit them to compliance.

Consequences of Infringements

This document constitutes an essential part of the business relationship between Vector and its business partners. In the event that a business partner is suspected of violating the principles or requirements set forth in this document, Vector reserves the right to demand the release of all relevant information. Vector also reserves the right to terminate the business relationship with the business partner in accordance with applicable law in the event of non-compliance with the requirements.

Notifications/Reports/Contacts

If you have any questions about the Code of Conduct or if you would like to report indications of a possible violation, please contact us using the following email address: compliance@vector.com