

PSG - Code of Conduct

PREAMBLE

For more than 30 years, PSG has been striving to solve the problems of indirect purchasing for its customers – sustainably! We see ourselves as a link between all market participants and work together with them responsibly, honestly and in partnership. As part of the EPSA Group, we share and support their vision that the company of tomorrow must and will act responsibly. This conviction leads us together to build a group with clear human values. For us, this collective project is the lever for necessary changes, a driver of our performance and a source of sustainable growth.

PSG is committed to ensure compliance with internationally applicable human rights and social standards along the entire value chain. Our business partners contribute significantly to our success. We see a common understanding of ethical and sustainable action as an essential basis.

The social and environmental standards and processes described here are based on the ten principles of the United Nations Global Compact, the International Charter 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.

The requirements and principles of this Code of Conduct are an integral part of the contractual obligations and cooperation between our business partners and PSG. Therefore, our business partners undertake to comply with and promote the following principles of this Code of Conduct and to train their employees regularly and appropriately in this regard. In addition, this content is also fully valid for suppliers and other third parties used by our business partners to fulfil the contract with PSG. Specifications corresponding to the contents of this Code of Conduct must therefore be integrated by the business partner into his own contracts. We expect him to obligate his suppliers and other third parties to the best of his ability.

Principle of legality

PSG represents the principle of strict legality for all actions, measures, contracts and other processes of PSG and expects the same from its business partners. Compliance with the principle of legality includes, among other things, the payment of taxes and customs duties owed, compliance with competition and antitrust law, the strict prohibition of corruption and money laundering, compliance with the state of the art, obtaining the necessary official permits, compliance with export control law and compliance with the legal rights of third parties as well as legal regulations for the protection of social and environmental standards.

SOCIAL

Human rights

We expect our business partners to consistently respect internationally recognized human rights and to actively promote them. This is based on the United Nations Guiding Principles on Business and Human Rights. These include the protection of local communities, indigenous people and human rights defenders.

Child labour

Our business partners undertake to employ only employees who have reached the minimum age required to perform work in accordance with the applicable national legislation and not to tolerate

child labour. ILO Conventions No. 138 on the Minimum Employment Age and No. 182 on the Elimination of the Worst Forms of Child Labour must be complied with. Our business partners also commit to respecting the dignity and rights of children.

Forced labour

We expect our business partners to strictly reject any kind of forced labour, including human trafficking, torture and any form of slavery or compulsory labour. The principle of freely chosen employment must also be respected and met.

Freedom of association

The fundamental right of employees to form trade unions and to join them freely must be respected by our business partners. Membership of trade unions or employee representatives must not constitute a reason for unjustified unequal treatment. Within the framework of the law and in accordance with ILO Convention No. 98, the right to collective bargaining to regulate working conditions and the right to strike must be guaranteed.

Equal opportunities and fair conduct

We expect our business partners not to tolerate any discrimination, for example on the basis of skin colour, ethnic origin, gender, age, nationality, social origin, disability, sexual orientation, religious affiliation, ideology or political and trade union activities. The same applies to any form of harassment. In the case of comparable requirements and tasks, the principle of equal pay for work of equal value must apply irrespective of the difference of sex. The ILO conventions must be complied with.

Fair working conditions

Our business partners guarantee the right of fair working conditions in accordance with the applicable ILO conventions. This particularly includes fair remuneration and social benefits that at least comply with national and local legal standards, regulations or agreements. Legal regulations on the minimum wage in the respective countries as well as the applicable regulations on working hours, breaks and holidays must be complied with.

Occupational health and safety

The respective national standards for a safe and hygienic working environment must be complied with by our business partners and appropriate measures must be taken to ensure health and safety at work in order to ensure healthy working conditions. Furthermore, our business partners, who are also manufacturers, examine the introduction and further development of an occupational health and safety management system (OHS) and introduce measures in this context to implement the objectives of an OHS management system in an appropriate manner.

Protection against forced eviction and confiscation of land

Our business partners undertake not to carry out unlawful evictions. In addition, they undertake not to unlawfully deprive land, forests or water bodies through acquisition, development or other use.

Use of private or public security forces

Our business partners undertake to refrain from hiring or using private and public security forces if, due to a lack of instruction or control on the part of the company, there is a risk of torture and cruel, inhuman or degrading treatment, injury to life or limb, or impairment of the freedom of association and labor.

ENVIRONMENTAL STANDARDS

Environmental protection

In accordance with the precautionary principle, our business partners undertake to avoid hazards to people and the environment as far as possible and to protect the natural basis for food production accordingly. Processes, operating sites and resources of our business partners comply with the applicable legal requirements and environmental protection. Our business partners commit themselves to the introduction and further development of an environmental management system (EMS) or to the implementation of measures in order to realize the objectives of an environmental management system analogous to ISO 14001 in a suitable manner.

Climate protection

We expect our business partners to pursue sustainable and active climate protection, for example by increasing energy efficiency or generating or purchasing energy from renewable sources. The aim is to create transparency about their CO₂ emissions and set ambitious CO₂ reduction targets.

Water consumption and quality

Our business partners are committed to using water carefully. Particularly in areas of water scarcity, water withdrawal must be minimized and access to drinking water and sanitary facilities must be guaranteed. Wastewater quality standards are to be defined and monitored within the framework of and in accordance with applicable legal and regulatory requirements.

Air quality and soil quality

Our business partners comply at least with the relevant legal requirements as well as the requirements of the local authorities.

Materials and disposal

We expect our business partners to minimize any impact of their business activities on the environment and to use resources sparingly. Wherever possible, materials are reused. When dealing with waste, our business partners follow the principle of "avoid before recycle before dispose". Our business partners always comply at least with the relevant statutory regulations and official requirements.

Substances of Concern

Our business partners are obliged to comply with material compliance, i.e. the legal prohibitions of ingredients, restrictions and declaration regulations, as well as applicable standards for the prohibition and declaration of ingredients.

BUSINESS CONNECTIONS

Avoidance of conflicts of interest

We expect our business partners to make decisions on the basis of objective considerations and not to be guided by personal interests in an inadmissible manner. As soon as a business partner becomes aware of a potential conflict of interest, he is required to take internal measures to eliminate these conflicts and to inform PSG immediately.

Free competition

Our business partners are obliged to behave fairly in competition and to comply with the applicable legal regulations that protect free competition. Furthermore, they will not enter into agreements or concerted practices with other undertakings which have as their object or effect the prevention,

restriction or distortion of competition in accordance with the applicable antitrust laws and shall not unlawfully exploit any dominant position.

Corruption

Compliance with the applicable anti-corruption laws must be ensured by our business partners. In particular, they shall ensure that their employees, subcontractors or agents do not offer, promise or grant any benefits to employees of PSG with the aim of obtaining an order or other preference in the course of business. These principles also apply if our business partners cooperate with other third parties in connection with their work for PSG.

Money laundering

Our business partners must also comply with the relevant legal provisions for the prevention of money laundering and duly comply with their reporting obligations.

Conflict minerals

Our business partners work to eliminate direct or indirect funding of armed groups. PSG supports the OECD Guidelines for Promoting Responsible Conflict Minerals Supply Chains. We expect our business partners not to source goods and materials for the manufacture of their products in an illegal or unethical manner and to provide us with sufficient information regarding conflict minerals in the supply chain.

Data protection and data security

Our business partners are obliged to guarantee the right to informational self-determination, the protection of personal data and the security of all business information and personal data in all business processes in compliance with legal requirements and the applicable data protection and information security laws.

Customs and export control regulations

Our business partners comply with international customs and export control regulations and ensure the proactive exchange of information relevant to foreign trade with the aim of a secure supply chain.

Whistleblower

Every business partner – their employees or affected persons – is called upon to report possible suspected cases and violations of this Code of Conduct. In this way, the consequences of such violations should be limited and comparable misconduct avoided in the future. For this purpose, the business partner shall set up its own whistleblowing system or join an industry-wide system. Our business partners shall inform their employees about the possibility of whistleblowing.

COMPLIANCE WITH THE CODE OF CONDUCT

Controls

PSG reserves the right to reasonably verify compliance with this Code of Conduct. In doing so, the business partner is obliged to actively support the necessary controls.

Remedies

Violations, in particular of human rights-related or environmental obligations, must be stopped immediately. If this is not possible in the foreseeable future, the business partner must immediately create and implement a concept for termination or minimization. The concept must include a concrete timetable. Initiated measures must be documented and checked for effectiveness. In

addition, in the event of a suspected violation, the business partner must immediately clarify possible violations and inform PSG of the clarification measures taken.

Consequences of infringements

A violation of the duties described in this Code of Conduct constitutes a breach of contract towards PSG as well as a material impairment of the business relationship between PSG and the business partner. The business partner must inform PSG within a reasonable period of time of the internal measures it has taken to prevent future violations. If the business partner does not comply with these obligations within a reasonable period of time, if no suitable improvement measures are initiated by the business partner within a reasonable period of time or if a violation is so serious that a continuation of the business relationship becomes unreasonable for PSG, PSG reserves the right, without prejudice to further rights, to terminate the affected contractual relationship without notice or to withdraw from the affected contract.

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