

# Supplier Code of Conduct



Spedicam & Logistik GmbH

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## Preamble

This Supplier Code of Conduct has been approved by the management of Spedicam & Logistik GmbH<sup>1</sup>. The Code emphasizes the importance that Spedicam attaches to responsible and sustainable business relationships.

It defines the values and behavioral principles that are expected from all suppliers, their employees, and the entire supply chain. These principles form the binding foundation for the cooperation between Spedicam and its suppliers.

For this reason, Spedicam expects its suppliers to take responsibility for adhering to this Code and to ensure that their employees and their own suppliers follow these principles as well.

### Scope of application

This Code applies to all natural and legal persons, who supply products, processes or services directly or through third parties, such as subcontractors or agents<sup>2</sup>, to Spedicam.

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<sup>1</sup> Hereinafter referred to as "Spedicam"

<sup>2</sup> Hereinafter referred to as "suppliers"

# 1 Basic principles and behavioral requirements

## 1.1 Integrity

Integrity means that the business practices of Spedicam are always aligned with the ethical principles and values of the company. Spedicam expects its suppliers to comply with all relevant legal regulations and to observe the behavioral guidelines outlined in this document.

Spedicam conducts long-term business relationships only with partners whose business practices are in line with the principles of this Code. This serves to protect the company and its employees from legal or financial risks.

## 1.2 Transparency, trust, and cooperation

Spedicam is a reliable and fair business partner. Spedicam and its employees always operate transparently in cooperation with suppliers. Transparency fosters trust, which is an indispensable foundation for a successful and sustainable partnership in the supply network. We also expect you, as a supplier, to adhere to this principle.

Responsible collaboration requires that all actions and decisions are traceable and transparent. Only in this way can they be accepted and supported by all parties involved. Transparency in this context also means addressing issues openly and honestly and communicating clearly with each other.

## 1.3 Managing Risks

Spedicam consciously takes calculated risks when necessary to achieve the company's strategic goals and to capitalize on associated opportunities. Business success typically requires seizing opportunities while also recognizing, assessing and actively managing potential risks early on.

Given the complexity of the global supply network, which also includes our suppliers, careful analysis and evaluation of supply chains is a crucial part of this process.

We expect our suppliers' active support in identifying and assessing risks, particularly in relation to the use of methods such as self-disclosures or on-site inspections.

## 1.4 Respect for Human Rights

Respect for human rights is a central element of Spedicam's corporate responsibility. As a supplier, you should also commit to the fundamental principles of human rights, as outlined in the "UN Guiding Principles on Business and Human Rights", the ten principles of the "UN Global Compact," and the guidelines of the International Labour Organization (ILO).

Spedicam expects its suppliers to respect the dignity and rights of every person, particularly those with whom they are connected through business relationships, activities or products. Additionally, Spedicam expects you to proactively take measures to prevent human rights violations and address existing impacts.

### **1.5 Compliance with applicable laws**

Spedicam is committed to respecting and adhering to all applicable local, national and international laws and regulations. Compliance with these regulations is a prerequisite for the sustainable success of the company. Violations can lead to serious legal and financial consequences that affect not only the company but also employees, business partners and other stakeholders.

Spedicam does not tolerate violations of applicable laws and expects its suppliers to strictly comply with all relevant legal provisions and regulatory requirements.

### **1.6 Avoidance of conflicts of interest**

Spedicam expects its suppliers to always act with the highest integrity and avoid potential conflicts of interest.

### **1.7 Care in handling Spedicam assets**

If suppliers are provided with Spedicam property, such as keys or keycards, they are obligated to handle these carefully and protect them from unauthorized access.

### **1.8 Proper accounting and financial reporting**

Spedicam expects its suppliers to always adhere to the standard accounting principles and, where relevant, the corresponding regulations for financial reporting.

### **1.9 Appropriate public conduct**

Spedicam prohibits its suppliers from making public statements or comments regarding Spedicam without prior written approval from the company. This also applies to the use of the Spedicam logo for personal purposes, which also requires explicit approval.

## 2 Conduct towards suppliers and third parties

### 2.1 Fair competition

Spedicam stands for fair and unaltered competition.

In many countries, there are legal regulations that prohibit agreements or behavior between competitors, suppliers, buyers and traders if they may restrict or distort competition. This also applies to the abusive use of market power through unilateral behavior.

Spedicam expects its suppliers not to engage in anti-competitive or cartel practices and encourages its suppliers to ensure that these standards are being upheld throughout their supply chain.

### 2.2 Anti-corruption

Spedicam tolerates no form of corruption. Any actions by suppliers that could create the impression of improper influence on business decisions are strictly prohibited.

Gifts, invitations and other advantages from suppliers are only permissible if they are appropriate and transparent.

As a supplier of Spedicam, you commit to refraining from offering or accepting any advantages aimed at influencing decisions.

Spedicam requires strict compliance with applicable anti-corruption laws.

### 2.3 Prevention of money laundering and terrorist financing

Spedicam expects its suppliers to comply with all legal regulations regarding the prevention of money laundering and terrorist financing and to refrain from engaging in activities that may facilitate or enable money laundering or terrorist financing.

### 2.4 Export control and sanctions law

There are national and international laws and regulations that govern the import, export and conduct of trade, intermediations, financing and provision of services.

Spedicam expects its suppliers to implement appropriate processes to ensure that all transactions and activities – both with third parties and Spedicam – are conducted in compliance with export control and sanctions regulations. In addition, any required documentation and information must be provided without delay.

### 2.5 Taxes and customs duties

Spedicam expects its suppliers to fully comply with all applicable tax and customs regulations.

## 3 Handling information

### 3.1 Protection of company-relevant information

Spedicam expects its suppliers to protect all company-relevant information from misuse, loss, destruction or manipulation.

### 3.2 Protection of personal data

Spedicam expects all personal data to be protected and respected in accordance with applicable data protection laws. Suppliers must ensure compliance with all relevant legal requirements, especially regarding the handling of personal data.

### 3.3 IT security

All data processed in IT systems must be protected according to reasonable economic considerations and the current state of technology. Legal requirements must at least be met.

## 4 Treatment of employees

### 4.1 Fair working conditions and employee development

Spedicam expects its suppliers – especially labor providers – to comply with the legally established minimum wages as well as the respective labor laws, particularly concerning working hours.

Recruitment practices must not involve deceptive or fraudulent practices. False information about working conditions, including details on wages and benefits, workplace, living conditions, work hazards, accommodation or associated costs (especially if the employer or intermediary provides or arranges these) should not be spread.

Employment contracts must be drawn up in accordance with the respective national regulations and laws and include a clear, understandable description of the working conditions.

Spedicam expects that identity documents of employees are neither withheld, altered nor destroyed.

Accommodation provided should meet at least the respective national standards.

#### **4.2 Diversity and equal treatment**

Spedicam expects its suppliers to create a respectful and non-discriminatory working environment where no form of intimidation, harassment or discrimination is tolerated. All employees should be treated equally regardless of age, gender, gender identity, ethnic origin, nationality, religion, worldview, disability or sexual orientation.

#### **4.3 Rejection of forced and child labor**

Spedicam strictly rejects any form of child labor, forced labor, modern slavery, involuntary prison labor, human trafficking and any other form of exploitation in its own business practices. Spedicam expects the same standards from its suppliers.

Severe forms of human trafficking, such as the use of violence, coercion, kidnapping, fraud, deception, abuse of power or the granting of payments or benefits to a person who controls the victim, will not be tolerated and will lead to immediate termination of the partnership.

Spedicam prohibits its suppliers from using forced labor or being involved in severe forms of human trafficking – including the provision of sexual services. Suppliers should take effective measures to combat human trafficking and regularly review the effectiveness of these measures.

## **5 Sustainability, environment, safety and health**

### **5.1 Sustainable Actions**

Sustainability is a central element of Spedicam's values and actions. Sustainable value creation is based on a balanced approach that includes economic, ecological and social responsibility – both in products and services as well as in the related processes and the entire supply chain. Spedicam therefore regards sustainable action as a comprehensive issue that can only be successfully implemented in its entirety.

Spedicam expects its suppliers to comply with relevant local, regional and international regulations regarding human rights, health protection, occupational safety and environmental protection for all products, processes and services.

### **5.2 Environmental and climate protection**

Spedicam expects its suppliers to take active responsibility to, for example, reduce air pollution, lower energy and water consumption, minimize waste and wastewater, close cycles and reduce greenhouse gas emissions. Any form of illegal waste treatment or disposal is rejected.



### 5.3 Occupational and health safety

Compliance with human rights also includes the responsibility to provide all directly employed employees and those in the supply chain with a safe and healthy work environment that meets legal requirements. Suppliers are expected to ensure that all relevant regulations are observed, and their compliance is always guaranteed. Special attention should be paid to the protection of young workers.

Suppliers are expected to adhere to all national laws and requirements and ensure a safe working environment. This also includes, if necessary, the provision of personal protective equipment as well as the development and implementation of emergency plans and drills.

## 6 Reporting, notices and contact person

### 6.1 Reporting misconduct of any kind

Misconduct is actively addressed by Spedicam. Employees and external partners are always encouraged to raise concerns or problems openly and without fear of retaliation. Retaliation against employees who report misconduct in good faith will not be tolerated.

To report concerns or provide feedback, please contact:

### 6.2 Contact

Stefan Laube-Wendler  
*Managing director*

Hamburger Straße 70  
90451 Nuremberg

E-Mail: [compliance@spedicamlogistik.de](mailto:compliance@spedicamlogistik.de)

Spedicam takes every report of misconduct seriously, considering the principle of proportionality. Every report will be carefully examined, and based on the results, it will be decided which actions are required, suitable, and appropriate in a transparent manner.

## Agreement to the Supplier Code of Conduct

As a supplier of Spedicam, we commit to adhering to the ethical and legal principles outlined in this Supplier Code of Conduct.

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Date / Signature and stamp of supplier or digital signature / Acknowledgment