

Code of Conduct for Subcontractors and Suppliers

The Apleona Group is bound by the principles of ethical behaviour, integrity and compliance. Adherence to the Code of Conduct and the compliance guidelines of Apleona as well as the United Nations Global Compact Initiative¹ is mandatory for all Apleona employees.

Also from its subcontractors and suppliers, Apleona expects integrity and ethical, law-abiding behaviour in line with the Global Compact Initiative and the minimum standards set out below.

Counteracting Corruption

Subcontractors and suppliers actively and consistently counteract criminal or unethical influence on decisions taken by Apleona or other companies and institutions and fight corruptibility within their own companies.

Counteracting Bid Rigging

Subcontractors and suppliers do not participate in illegal, anti-competitive bid rigging and take action against forbidden cartels.

Counteracting Illegal Employment

Subcontractors and suppliers comply with the applicable legal requirements and effectively eliminate illegal employment.

Respect for the Fundamental Rights of Employees

Subcontractors and suppliers respect the health, safety and personal rights of their employees and are bound by the principles of respect, fairness and non-discrimination. They employ and remunerate their employees on the basis of fair and compliant contracts and maintain international minimum labour laws.

Respect for the Environment

Apleona's subcontractors and suppliers comply with all applicable and relevant environmental laws and permits. They undertake to conserve resources, avoid waste and reduce unavoidable environmental pollution to an absolute minimum.

¹ <http://www.unglobalcompact.org>.

Apleona's suppliers and subcontractors make special efforts to reduce the carbon emissions generated by their business activities. This also includes efforts to achieve energy efficiency in products, services and transport.

Complying with the principles of Code of Conduct

Apleona requests from its subcontractors and suppliers that also they require their own subcontractors and suppliers to comply with the principles of the Global Compact Initiative and the minimum standards of this Code of Conduct for Subcontractors and Suppliers (Flow Down).

Subcontractors and suppliers of Apleona are required to report their own violations of this Code of Conduct for Subcontractors and Suppliers, insofar as these affect their business relations with Apleona. They are also asked to report any knowledge of misconduct on the part of Apleona employees.

Apleona Compliance Communications

Apleona Compliance Communications is available for information on compliance violations. If desired, information can be given anonymously.

You can reach Apleona Compliance Communications worldwide at:

Internet: <https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=2BT20&language=ger>

Subcontractors and suppliers are required to actively resolve any suspicious cases and to cooperate unconditionally with Apleona in this regard.

If there are reasonable grounds to believe that a subcontractor or supplier has violated this Code of Conduct for Subcontractors and Suppliers or if a subcontractor or supplier, when a suspicious case arises, fails to sufficiently meet his obligations to resolve the case and to cooperate, Apleona can, on the basis of existing contractual or legal rights, end all business relations with the subcontractor or supplier with immediate effect. In the event of a violation of this Code of Conduct for Subcontractors and Suppliers, Apleona retains the right to initiate further legal measures, particularly damage claims.

Apleona can, from time to time, appropriately update this Code of Conduct for Subcontractors and Suppliers and expects that subcontractors or suppliers accept any such changes.