

# Supplier Code of Conduct

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Proalpha Group

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## 1. Introduction and Purpose

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The Proalpha Group is convinced that long-term economic success is inseparably linked to ethical, responsible, and sustainable business conduct. This Supplier Code of Conduct defines the Proalpha Group's expectations regarding the behavior of its suppliers.

It is based on the same core values that we uphold internally: integrity, respect, loyalty, diversity, openness, and determination. As key partners in our business environment, we expect our suppliers to share the same ethical and professional standards that are upheld by the Proalpha Group. Our responsibility is reflected in three central areas: as a member of society, as a business partner, and in the workplace. Together with our suppliers, we seek to actively implement the principles associated with these responsibilities.

The Proalpha Group's Supplier Code of Conduct is aligned with internationally recognized standards, including the United Nations Guiding Principles on Business and Human Rights, the UN Global Compact, the ILO Core Labor Standards, and the OECD Guidelines for Multinational Enterprises.

Our shared actions have a direct impact on people, the environment, and society. The purpose of this Code is to establish a foundation for trustworthy, legally compliant, and customer-oriented cooperation that combines economic success with social and environmental responsibility.

## 2. Scope

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This Code of Conduct applies to all suppliers of the Proalpha Group and its affiliated subsidiaries worldwide. It is binding for the Proalpha Group and all of its subsidiaries, regardless of the country in which they operate. The requirements set forth in this Code apply whether the services are provided directly or indirectly. This includes physical products as well as digital, consulting, or other types of services.

The Proalpha Group expects its suppliers to ensure that their own subcontractors and business partners also comply with the principles outlined in this Code, provided they are involved in delivering services to the Proalpha Group.

If a supplier maintains its own code of conduct, it may be accepted if it includes standards and principles that are substantively equivalent. The Proalpha Group reserves the right to assess such equivalency on a case-by-case basis.

In the event of any discrepancies between applicable local laws or regulations and the requirements of this Code, the stricter provisions shall apply. Compliance with applicable law shall take precedence in all cases.

## 3. General Principles and Legal Compliance

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### 3.1 Compliance with Laws and Ethical Conduct

Our suppliers are required to comply with all applicable laws and regulations in their respective countries and to reject any form of unfair business practices. Any violation of applicable law may lead to consequences and jeopardize the business relationship with the Proalpha Group.

Suppliers are expected to follow ethically sound business practices and avoid any form of corruption, fraud, or unethical conduct. The Proalpha Group expects behavior that reflects integrity, respect, loyalty, diversity, openness, and determination.

The Proalpha Group aligns itself with internationally recognized frameworks such as the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the Core Labor Standards of the International Labour Organization (ILO). Suppliers are encouraged to take these principles into account in their conduct.

### 3.2 Responsibility and Cooperative Partnership

Suppliers are expected to maintain a respectful and cooperative relationship with the Proalpha Group, its customers, and its business partners. Decisions must be implemented reliably, agreements honored, and challenges communicated proactively.

Clear and transparent communication is an essential part of a successful collaboration. Suppliers take responsibility for the services they have committed to and for their proper execution. Feedback should be provided in a timely and traceable manner. Smooth cooperation is built on mutual understanding, trust, and dependability.

## 4. Human Rights and Working Conditions

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### 4.1 Respect for Human Rights and Prohibition of Unethical Labor Practices

Suppliers must respect internationally recognized human rights and ensure that they are upheld throughout their operations. Violations of human rights, including forced labor, slavery, human trafficking, child labor, and discrimination, will not be tolerated.

The Proalpha Group expects implementation in accordance with internationally recognized standards, including the ILO Core Labor Standards, the UN Guiding Principles on Business and Human Rights, and the United Nations Global Compact.

The employment of minors is permitted only within the framework of legally allowed training programs. Activities that may endanger the safety, health, or moral development of young people are strictly prohibited.

### 4.2 Working Conditions and Equal Treatment

Suppliers are expected to treat all individuals with respect, fairness, and appreciation for diversity. Discrimination, racism, harassment, or bullying in any form is not acceptable. People of different ethnic backgrounds, religions, beliefs, ages, disabilities, languages, genders, or sexual identities must be valued and not subjected to discrimination.

All employment and business decisions must be based on objective criteria such as qualifications, skills, and performance, and must comply with applicable labor laws.

Suppliers must ensure a safe and healthy working environment and comply with national occupational safety regulations and health protection requirements. The continuous improvement of working conditions and the promotion of employee health are essential components of this responsibility. The payment of a living wage, along with adherence to statutory working hours and rest periods, is explicitly expected. Freedom of association and the right to collective bargaining must be respected, where legally permitted.

### 4.3 Implementation and Responsibility in the Supply Chain

The requirements outlined in this chapter apply not only to the direct business partners of the Proalpha Group, but also throughout the respective supply chain. Therefore, suppliers of the Proalpha Group are required to take appropriate measures to ensure that these standards are also upheld by their upstream suppliers and subcontractors.

## 5. Environmental and Climate Protection

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### 5.1 Environmental Awareness and Legal Requirements

Suppliers are expected to conduct their business activities in an environmentally responsible manner and to minimize negative environmental impacts. This includes, in particular, compliance with all applicable environmental protection laws and regulations at their respective locations.

The Proalpha Group expects its suppliers to take responsibility for environmental and climate protection and to contribute to sustainable development. Sustainable action also includes the prevention of risks to people and the environment, such as air, water, or soil pollution, excessive water consumption, or the inappropriate use of hazardous substances.

### 5.2 Resource Conservation, Waste Reduction, and Climate Protection

Suppliers are encouraged to minimize the consumption of resources such as energy, water, and raw materials. Emissions, waste, and wastewater should also be reduced as much as possible.

The Proalpha Group welcomes measures that promote circular economy practices, protect biodiversity, and improve energy efficiency. The goal is to avoid or reduce negative impacts throughout the entire supply chain. The use of environmentally friendly materials and the reduction of single-use packaging are considered positive examples of sustainable sourcing.

Suppliers with high environmental or climate-related risk are explicitly encouraged to implement appropriate control processes to identify, document, and reduce environmental impacts. The implementation of a structured environmental management system is recommended.

## 6. Ethical Business Conduct

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### 6.1 Integrity, Anti-Corruption, and Conflicts of Interest

We reject all forms of corruption and bribery. Our success is based on honest values such as innovation and flexibility. Gifts or invitations must never be used to gain unfair advantages in business dealings. Employees of the Proalpha Group may not accept inappropriate gifts or other monetary benefits from business partners. Suppliers must not support money laundering or the financing of terrorism in any way. They are responsible for complying with all applicable national and international laws governing anti-money laundering and the financing of terrorism.

Suppliers must ensure that their personnel avoid any potential conflicts between personal interests and the interests of the Proalpha Group. This applies in particular to business decisions, financial interests, contract awards to close associates, or existing personal relationships with employees of the Proalpha Group.

The Proalpha Group expects its suppliers to make business decisions with integrity and in full independence. It must always be ensured that customer trust is maintained and that the business success of all parties involved is not unduly affected.

## 6.2 Fair Competition and Prevention of Market Distortion

Suppliers are expected to respect fair and open competition and to comply with all applicable competition and antitrust laws. Anticompetitive agreements or unlawful exchanges of information, particularly regarding prices, terms, or market strategies, are strictly prohibited.

The Proalpha Group expects its suppliers to behave responsibly in competitive situations and to handle confidential information of competitors, customers and partners with care and respect.

## 6.3 Transparency in Donations, Sponsorships, and Business Conduct

Suppliers must not make donations or investments in order to gain or retain improper advantages with the Proalpha Group. Sponsorship activities must be transparent, serve a legitimate business purpose and be proportionate to the value provided. They must be documented in a written agreement.

Proper and traceable handling of business decisions, benefits and external activities is a fundamental basis for trust in the collaboration with the Proalpha Group. All business activities related to the Proalpha Group must be documented transparently, completely, and truthfully. Suppliers are required to meet their tax and customs obligations in accordance with applicable legal requirements. Suppliers must ensure that their business practices are transparent, traceable, and objectively justified. Preferential treatment or undue advantages based on personal connections or non-objective criteria must be avoided.

## 7. Data Protection, Information Security, and Intellectual Property

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Suppliers must ensure that the processing of personal data is always carried out in compliance with applicable data protection laws, such as the General Data Protection Regulation (GDPR). The consent of the data subject or another valid legal basis must be obtained before processing such data.

All trade and business secrets as well as other confidential information of the Proalpha Group must be treated with strict confidentiality. Such information may not be disclosed to third parties or used for purposes other than those agreed upon without explicit authorization.

Suppliers are responsible for maintaining the security of their IT systems and regularly assessing them for potential vulnerabilities. Any potential threat or security incident that could affect the Proalpha Group must be reported without delay.

The protection of the intellectual property of the Proalpha Group, including copyrighted works, trademarks, patents, and technical information, must be ensured at all times. The use or disclosure of such assets is only permitted with prior explicit approval.

Suppliers are required to handle the property and resources provided by the Proalpha Group with care and use them only as intended. Any misuse, negligence, or unauthorized use is strictly prohibited.

## 8. Export Controls and Sanctions

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Suppliers must comply with all applicable national and international export control and sanctions regulations, including those of the European Union and the United States. This particularly includes

restrictions on the export, re-export, or provision of goods, software, technologies, and services that can be used for both civilian and military purposes.

Engaging in business relationships with individuals, companies, or organizations listed on applicable sanctions lists is strictly prohibited. Suppliers are required to implement appropriate measures to prevent violations of applicable export control and sanctions regulations.

## 9. Implementation and Management Systems

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Suppliers are required to take appropriate measures to effectively implement the requirements of this Code of Conduct. This includes, in particular, suitable processes and internal responsibilities that support compliance with legal requirements as well as the standards described in this Code.

The type and scope of the measures should reflect the scale of the business activities and the nature of the business relationship with the Proalpha Group. Suppliers are expected to identify risks, establish basic control mechanisms, and, where necessary, raise awareness among their employees.

Upon request, appropriate evidence of implementation must be provided to the Proalpha Group. This may include a self-declaration or the submission of relevant documentation. Open and responsible communication is considered a foundation for a trust-based collaboration.

## 10. Whistleblower Mechanism

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Suppliers are required to promptly report any potential violations of this Supplier Code of Conduct or applicable laws, particularly in the areas of human rights, environmental protection, or ethical conduct.

Reports may be submitted through the Proalpha Group's whistleblower system or via an appropriate internal procedure established by the supplier. In any case, it must be ensured that reports can be submitted anonymously and confidentially.

The Proalpha Group promotes a culture of open communication and accountability. Retaliation against whistleblowers is strictly prohibited. The confidentiality of all reports is guaranteed.

The Proalpha Group's whistleblower system is available at the following link:

[Proalpha Whistleblowing System](https://www.proalpha.com/en/whistleblowing-system) (<https://www.proalpha.com/en/whistleblowing-system>)

## 11. Contractual Consequences and Escalation

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Compliance with this Supplier Code of Conduct is a fundamental basis for the business relationship with the Proalpha Group. Violations of the requirements set forth in this Code may result in different consequences depending on their nature and severity.

In cases of non-severe violations, suppliers will generally be granted the opportunity to remedy the situation within a reasonable period of time. If no appropriate corrective action is taken or if the violation is serious or repeated, the Proalpha Group may terminate the cooperation with the supplier.

Serious violations, in particular those relating to human rights, environmental obligations, or legal requirements, may result in the immediate termination of the business relationship.

The Proalpha Group also reserves the right to take identified violations into account when evaluating existing suppliers and selecting future business partners.

## 12. Acknowledgment and Commitment

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Suppliers of the Proalpha Group acknowledge this Supplier Code of Conduct as binding. Alternatively, a supplier's own Code of Conduct may be applied, provided it contains requirements that are substantively equivalent with regard to human rights, working conditions, environmental protection, ethical behavior, and lawful business practices. In such cases, the supplier is required to confirm in writing and under its own responsibility that its Code of Conduct fully complies with the requirements set forth in this Code. Section 11 of the Proalpha Group Supplier Code of Conduct shall apply accordingly.

The Proalpha Group does not conduct any substantive review or assessment of the supplier's Code of Conduct. Responsibility for the equivalence of content and for providing the required proof under legal or regulatory obligations lies solely with the supplier.