

Supplier Code of Conduct – Due diligence policy statement

Blume Elektronik Distribution GmbH is committed to its social responsibility in the context of corporate activities worldwide. In addition to legal, economic, technical and procedural criteria, we also pay attention to social and ecological aspects such as human rights, working conditions, corruption prevention and climate and environmental protection in our procurement activities. For this reason, we have firmly integrated responsible action into our procurement processes and developed this Supplier Code of Conduct, which clearly formulates our expectations of our suppliers. The Supply Chain Due Diligence Act that applies in Germany is also intended to improve the social responsibility of companies regarding the protection of fundamental human rights and also include environmental concerns, provided they serve to protect human health. Our aim is to only work with suppliers who follow the principles set out here and who comply with the relevant national laws in this context.

Blume Elektronik Distribution GmbH makes this Supplier Code of Conduct available with the aim of strengthening the common understanding of the implementation of the principles listed below in business cooperation.

1. Integrity and ethics

1.1 Compliance with applicable laws and regulations

We are committed to the values of integrity and lawful conduct, particularly regarding the European and national laws and regulations applicable at our location. We are committed to these values both within our own company and in our relationships with suppliers. Our success and reputation depend on a shared commitment to always act on these values. We expect our suppliers to ensure these fundamental values by complying with the laws and regulations that apply to them and by taking appropriate measures to this end.

Suppliers must also support us as their customers in meeting own legal and regulatory requirements. You will make every effort to maintain the required documentation and to present it correctly and completely on request.

1.2 Prohibition of corruption, bribery and money laundering

We expect that our suppliers will not tolerate corruption and in their companies be ensured, that comply with the conventions of the United Nations (UN) and the Organization for Economic Co-operation and Development (OECD) to fight corruption and relevant anti-corruption laws, including those dealing with bribery abroad. Our suppliers reject any form of corruption, bribery, theft, embezzlement, fraud or extortion, nor will they tolerate illegal payments or the granting of any other advantage to an individual, company or public official to influence decision-making processes. In particular our suppliers shall not, under any circumstances, offer, grant or accept, either themselves or through third parties, any bribes, kick-back payments or other illegal payments, inducements, favors or other advantages or gifts of value for the realization of business opportunities, to expedite or facilitate an official act

(kickbacks or expediting money) or in any way related to the business activities of Blume Elektronik Distribution GmbH.

Money laundering is generally defined as conducting a transaction involving assets obtained through criminal methods, structuring a transaction in a manner that avoids the detection of criminal behavior, or conducting a transaction that encourages criminal activity.

We expect our suppliers to comply with all applicable anti-money laundering laws and regulations. In addition, they must take appropriate measures to ensure that they only establish relationships with trusted business partners who are engaged in legitimate business activities with funds from legitimate sources.

1.3 Avoiding conflicts of interest and raising concerns

We expect our suppliers to make decisions related to doing business with us based solely on factual criteria. Conflicts of interest with

private concerns or economic or other activities, including those of relatives or other related persons or organizations, are avoided from the outset.

Our suppliers must provide means for their employees to report compliance concerns, including potentially illegal activity in the workplace or potential violations of laws and regulations, at any time and without fear of retaliation. Any compliance report made in good faith should be protected by an appropriate policy against retaliation. Every compliance report – as well as the identity of the reporting person – must be treated confidentially. Where permitted by local law, it should be possible to make compliance reports anonymously. Suppliers must promptly and properly investigate any compliance report and take corrective action as necessary.

1.4 Fair competition

We expect our suppliers to behave fairly in competition and to comply with applicable antitrust and competition law. Our suppliers do not participate in anti-trust violations agreements with competitors, nor do they abuse a potentially dominant market position, nor do they participate in other anti-competitive business practices.

1.5 Foreign trade law

We expect our suppliers to consistently comply with the applicable international and national regulations of foreign trade law, in particular export control and embargo regulations, and not to engage in any illegal business activities with sanctioned persons, companies or organizations.

1.6 Terrorist financing prevention

We expect our suppliers to comply with applicable legal obligations to prevent terrorist financing and not to engage in terrorist financing directly or indirectly.

1.7 Data protection, information security, confidentiality and intellectual property

Our suppliers must properly use confidential and protected by copyright information. They must protect both their own and Elektronik Distribution GmbH's intellectual property, including patents, trademarks, copyrights, trade secrets, technical and scientific information, or the know-how and expertise accumulated in the course of our business activities.

We expect that our suppliers attach special importance to the protection of personal data and comply with all applicable data protection laws. Information systems of suppliers that contain confidential information or data of Blume Elektronik Distribution GmbH must be managed appropriately and protected against unauthorized access by their appropriate technical protection.

2. Human rights and working conditions

We expect our suppliers to comply with the International Human Rights Charter of the United Nations, considering the laws and legal forms applicable in the various countries and locations, the basic employee rights of the applicable national legislation and recognition of the core labor standards of the International Labor Organization (ILO). This requirement includes the use of external personnel by the supplier, regardless of the type of contract, e.g. work contract or temporary work. In addition, the rights of third parties are respected and any impairments are kept as low as possible in compliance with all international standards.

2.1 Prohibition of child labor

Our suppliers must speak out clearly against any form of exploitative child labor. No workers may be employed who are under the minimum age for regular employment as defined by applicable national legislation or international conventions. We expect our suppliers to adhere to the ILO core labor standards and in this context prohibit and refrain from any kind of child labor in their companies.

2.2 Prohibition of forced labor

We expect that our suppliers will not allow or engage in any form of forced or compulsory labor or human trafficking in their businesses. All activities must be carried out on a voluntary basis. Employees must be free to part with their employer in accordance with the statutory notice periods. Forced labor refers to all forms of debt bondage. We expect our suppliers to prohibit all surveillance measures in their companies, such as withholding identification documents, passports, work permits or deposits as a condition of employment.

2.3 Prohibition of discrimination

We expect a working environment from our suppliers that is consistently free of any form of discrimination. No employee of the supplier may be disadvantaged, favored, or harassed because of characteristics such as gender, skin color, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation and identity or other characteristics.

2.4 Freedom of association

Our suppliers must respect the rights of employees in accordance with the applicable national legislation in order to be able to form employee representation and engage in collective bargaining.

2.5 Freedom of expression, personal rights and privacy

Our suppliers respect the right to freedom of expression such as the protection of the personal rights and privacy of their employees.

2.6 Working hours and payment

We expect our suppliers to comply with the applicable national legislation on working hours. If there is no national legal regulation, the international standards of the ILO apply. Furthermore, it is expected that the employees of the suppliers receive remuneration that is at least in line with the applicable national laws and the legally valid and guaranteed minimum income and social benefits.

2.7 Work- and health protection

Our suppliers agree to comply with the applicable national legislation on occupational health and safety and to ensure humane working conditions. We expect our suppliers to set up and apply an appropriate occupational health and safety system. This includes the determination, evaluation and reduction of actual and potential accident and health risks, the recording and investigation of incidents, the provision of suitable work equipment and protective equipment as well as appropriate measures for emergency prevention and defense. In addition, employees are trained and instructed in occupational safety in a form that they can understand.

3. Environmental protection

Our suppliers take all necessary measures to minimize the adverse effects of their activities on the environment and to eliminate or, if it is not possible to avoid them, to minimize and control all significant environmental risks. We expect our suppliers to avoid pollution, promote efficient use of natural resources, recycle waste and reduce their environmental balance. This includes the conservation natural resources by operating in an environmentally responsible and efficient business activity, avoiding the use of hazardous substances and carrying out activities to reuse waste products.

3.1 Environmental law

Our suppliers must comply with applicable national energy and environmental laws and related regulations and standards. All required environmental permits, licenses, information registrations and restrictions are to be obtained. The associated operating and reporting obligations must be fulfilled.

3.2 Waste and emissions

Our suppliers must have systems in place to ensure safe and lawful handling, transportation, storage and disposal of waste and emissions. Waste or emissions that may affect human health and the environment must be properly managed, controlled and treated before being discharged into the environment. All required plant and equipment shall be constructed and maintained to control relevant risks.

3.3 Outlets and inlets

Our suppliers must have systems in place to prevent or reduce the accidental spills and discharges of hazardous substances, waste, effluents and emissions into the environment or facilities where the associated risks can no longer be controlled (e.g. public sewers, public surfaces). Procedures must also be put in place to minimize potential impacts on the affected environment (stakeholder).

4. Conflict minerals and high-risk raw materials

We expect our suppliers to perform their due diligence to promote responsible raw material supply chains and comply with all applicable legal regulations on conflict minerals. It is expected that minerals, in particular tin, tantalum, tungsten, gold and the corresponding ores and metals have been acquired without conflict. In the event that a product contains one or more of the so-called conflict minerals or high-risk raw materials, such as cobalt, which is an important raw material for battery production, we expect that they will be able to ensure transparency about their supply chain up to the smelter and the origin of the material upon request. Smelters without an appropriate and verified due diligence process should be excluded.

5. Communication of our Supplier CoC in the supply chain

our suppliers must ensure that the principles described in this code of conduct also in the lower levels of the supply chain and beyond, that all third-party providers / subcontractors who act on behalf of the supplier and have an impact on the business relationship with Blume Elektronik Distribution GmbH observe the code of conduct.

Our business relationship is based on mutual sincere and respectful interaction between business partners. Suppliers can also demonstrate their commitment to this code of conduct by complying with their own comparable code of conduct or their own company guidelines.

6. Conformity of our Supplier CoC

Blume Elektronik Distribution GmbH reserves the right to make changes to this code of conduct to a reasonable extent. This right is primarily exercised in the event of changes to the Supply Chain Due Diligence Act applicable in Germany or if this law is adapted to the upcoming European Supply Chain Act. Any adjustments will be communicated to the suppliers in good time via the company's website and via the request for supplier self-assessment. Upon request, suppliers will fill out a questionnaire on compliance with this Code of Conduct (self-assessment).

Any breach of the principles and requirements of this Supplier Code of Conduct will be considered a material breach of the contractual relationship by the supplier. If there is a suspicion of non-compliance with the principles described and requirements, Blume Elektronik Distribution GmbH reserves the right to request information about the relevant facts. In addition, we have the right to terminate extraordinary individual or all contractual relationships with suppliers who demonstrably do not comply with our code of conduct for suppliers or who do not strive for and implement improvement measures after setting a reasonable period of time.

General information:

Wherever possible, we use neutral language to address all genders.
All designations of persons such as e.g. employee or worker we understand as gender neutral.

Sources on which this Code of Conduct is based:

German Federal Ministry of Labor and Social Affairs:

[Act on Corporate Due Diligence Obligations in Supply Chains \(bmas.de\)](https://www.bmas.de)

Act on Corporate Due Diligence in Supply Chains Germany (LkSG):

[Act on Corporate Due Diligence Obligations in Supply Chains Germany \(csr-in-deutschland.de\)](https://www.csr-in-deutschland.de)

International Labor Organization – ILO core labor standards:

<https://www.ilo.org/>

The Organization for Economic Cooperation and Development:

<https://www.oecd.org/about/>

OECD- guiding principles:

<https://www.oecd.org/daf/inv/mne/48004323.pdf>