

Code of Conduct for Suppliers

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1. Introduction

At PANOVO tec, longstanding collaboration, mutual commitments, sustainability, and social responsibility are core principles. These principles are of particular importance in the procurement of raw materials, semi-finished goods, finished products, and services, and we expect our suppliers to adhere to them as well. This code applies to all suppliers of PANOVO tec.

The provisions of this code extend to all employees of the supplier, regardless of their position or relationship to the supplier. Therefore, this code also applies to employees who are informally employed, on temporary contracts, or part-time. Suppliers will actively endeavor, where feasible and appropriate, to ensure that their suppliers or subcontractors also adhere to the guidelines of this code. Compliance with this code is an essential requirement for any business relationship between PANOVO tec and its suppliers.

This code is based on guidelines, norms, and standards including:

- the Universal Declaration of Human Rights of the United Nations
- the UN Convention on the Rights of the Child
- the fundamental conventions and international labor standards of the ILO (International Labour Organization)
- the principles of the United Nations Global Compact

2. Obligations of PANOVO tec GmbH

- PANOVO tec GmbH commits to adhering to the guidelines applicable to suppliers.
- Actively collaborate with suppliers to promote these guidelines.
- Maintain transparent communication with suppliers.

3. Obligations of Suppliers

Suppliers of PANOVO tec commit to fully complying with regional, national, and international laws in their current versions. Specifically, examples include:

- EU Directive 2011/65/EU (RoHS 2)
- European chemicals regulation REACH
- Minimum Wage Act (MiLoG)
- Directive 2012/19/EU – WEEE2

4. Protection of Human Rights

Suppliers commit to upholding the human rights of their employees. No employee shall be discriminated against based on nationality, religion, age, ethnic origin, gender, or sexual orientation by the supplier or any other employee. Child labor and forced labor are prohibited.

5. Occupational Safety

Suppliers must control the exposure of their employees to potential safety risks through proper design, engineering controls, administrative controls, preventive maintenance, safe work practices, and ongoing safety training. We require our suppliers to comply with existing occupational safety regulations. We encourage our suppliers to develop and implement emergency plans to minimize the impact of emergency situations. This includes training their employees in appropriate evacuation procedures, emergency reporting, and emergency plans.

6. Occupational Health

We expect our suppliers to provide their employees with a workplace free from hazards and health risks. Suppliers are required to implement measures for workplace health protection. Minimum requirements for a safe and healthy workplace include providing drinking water, adequate lighting, appropriate room temperature, good ventilation, sanitary facilities, and potentially safe and healthy company accommodations.

7. Environmental Protection

Suppliers must proactively and responsibly manage their operations to minimize adverse environmental impacts of their activities, products, and services. This includes:

- Waste reduction
- Waste separation
- Improving energy efficiency
- Minimizing and safely storing hazardous substances
- Using environmentally friendly technologies

8. Anti-Corruption

Suppliers must not tolerate corruption under any circumstances and must actively combat all forms of corruption, whether in the public or private sector. Offering, demanding, giving, accepting, or receiving bribes and other inappropriate advantages—directly or indirectly, for business or personal gain, for oneself or others—is strictly prohibited.

9. Business Gifts, Hospitality, and Entertainment

Suppliers must prohibit the offering and acceptance of business gifts, hospitality, and entertainment—or any other form of advantage—that could constitute undue influence or be perceived as such. Suppliers should exercise particular caution when dealing with government officials.

10. Sanctions

Suppliers must not engage in business or maintain relationships with any country, group, organization, or individual subject to sanctions.

11. Fair Competition

Suppliers should uphold high economic and ethical standards and conduct their activities in accordance with market competition regulations applicable in their operating regions. They must refrain from participating in illegal price-fixing, illegal market allocations, or other business practices that violate applicable competition laws.

12. Ethics

Adherence to ethical and moral principles is fundamental to us. It is essential that our suppliers share this commitment as part of their own principles. We place equal emphasis on integrity in business transactions, as well as on data protection and digital ethics. Responsible sourcing of raw materials is of utmost importance to us.