

SUPPLIER CODE OF CONDUCT

AMPRION PROCUREMENT
VERSION 01.12.2023

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1 Objective

As a transmission system operator, Amprion operates in an environment that is shaped by a wide range of regulations and laws. At the same time, our task entails a great social responsibility. We are constantly aware of this: our actions are determined by personal responsibility, honesty, integrity and respect for our fellow human beings and the environment.

We face up to this responsibility not only with regard to our own business activities, but also expect our suppliers to fulfil their social responsibility.

This includes, among other things:

- Compliance with local laws,
- Respect for human rights, in particular the UN Guiding Principles on Business and Human Rights as well as the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises,
- Integrity in business practices,
- Respect and compliance with ecological standards and environmental and climate protection.

This Code is addressed to all contract partners of Amprion GmbH and its subsidiaries ("Amprion") who provide goods or services to Amprion ("Suppliers"). We expect all Suppliers to act in accordance with Amprion's values and principles set out in this document and to work towards the implementation of these values in their own supply chain.

2 Human rights and social responsibility

Amprion expects its suppliers to apply the humanitarian and social minimum standards resulting from national and international law in their own business activities as well as in their upstream supply chain. Standards for a company may also result from collective agreements with trade unions or employee representatives. This applies both to employees and to persons indirectly affected by the activities of suppliers.

Particular attention should be paid to:

- the prohibition of child labour,
- the prohibition of any form of forced or compulsory labour, (modern) slavery, human trafficking, servitude, debt bondage, labour exploitation, verbal or physical abuse,

violence or coercion, psychological abuse, sexual harassment, threats or intimidation, and other abusive working conditions,

- the implementation, compliance and monitoring of health and safety measures at the workplace,
- the implementation of measures to prevent excessive physical and mental fatigue, in particular through inadequate work organization in terms of working hours and rest breaks,
- respect for the right to freedom of association and the right of collective bargaining,
- rejection of any form of discrimination, including but not limited to personal characteristics such as gender, sexual orientation, nationality, ethnic origin, social background, skin colour, religious beliefs, political opinions, disability, age, physical or mental health status, or any other form of discrimination and harassment in the work environment,
- the guarantee of an adequate wage (remuneration at least equal to the minimum wage of the place of employment) in order to provide an adequate standard of living,
- the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in the acquisition, construction or other use of land, forests and waters, the use of which secures the livelihood of a person,
- responsible handling when hiring or using security companies, especially their instruction and supervision.

Suppliers can address their social responsibility through other measures, such as:

- timely communication of important company actions to the workforce,
- involve employees in decisions regarding work processes, particularly with respect to occupational health and safety,
- when necessary, assist employees in accessing health care,
- provide employees with appropriate training for their jobs and take into account their experience when assigning tasks,
- purchase goods and services from small and medium-sized enterprises located in close geographical proximity to the supplier's premises and/or owned or managed by members of vulnerable, marginalized, or underrepresented groups.

Amprion expects its suppliers to select their own suppliers according to the criteria described here and to avoid or at least minimize negative impacts on human rights through their value chain and to have a positive impact on strengthening social standards along their supply chain.

3 Integrity in business relations

Amprion expects its suppliers to always comply with the ethical standards of proper business conduct and, especially, to comply with applicable regulations and laws. In particular, the requirements cover the following aspects:

Preventing and combating corruption and money laundering

Amprion expects suppliers to comply with applicable laws and regulations regarding bribery, anti-corruption and gifts, hospitality, and gratuities. Suppliers and their employees shall not offer, promise, or give, direct or indirect, unauthorized financial or non-financial benefits to public officials or third parties in connection with business activities for the purpose of improperly influencing a business outcome, inducing, or rewarding criminal conduct, or influencing a business, contractual, regulatory, or personal decision. Nor may suppliers or their employees accept, demand or be promised such benefits.

Suppliers must also ensure compliance with applicable laws to prevent money laundering and transparency regulations.

Preventing and combating fraud and embezzlement

Suppliers of Amprion shall not engage in any form of fraud, embezzlement, extortion, bankruptcy fraud, illegal payments or other illegal activities.

Ensuring fair competition

Amprion expects its suppliers to comply with applicable laws in the context of free competition and cartels and dominant market positions. This includes compliance with laws governing anti-competitive activities. There shall be no improper acquisition of information about competitors and no false or misleading statements about competitors.

Avoidance and disclosure of conflicts of interest

Amprion expects its suppliers to avoid any activity that could lead to a conflict of interest. However, should a conflict of interest arise, it should be disclosed without delay so that appropriate measures can be taken to resolve it.

Sanctions, export and import regulations

Amprion expects its suppliers to comply with sanctions imposed by the German government as well as by other states and multilateral institutions, to the extent that such sanctions do not conflict with German or international law. In addition, all applicable import and export control laws must be complied with.

Protection and security of personal data

Amprion expects its suppliers to handle personal data and confidential information with care and not to disclose or make it available to unauthorized persons. They must comply with applicable data protection laws.

Intellectual property

Amprion expects its suppliers to respect the intellectual property of Amprion and other companies. Suppliers shall in particular not use any components or similar in their value chain that have been put on the market in violation of existing intellectual property rights (in particular patent and trademark law).

4 Health and safety at the workplace

For Amprion, health and safety at the workplace have the highest priority. Amprion expects its suppliers to ensure a safe and healthy working environment and to take appropriate safety precautions. In this context, appropriate working conditions are to be integrated in accordance with the applicable laws, which serve in particular to avoid health and safety risks.

The freedom of movement of employees living in company dormitories shall not be restricted.

5 Sustainability and environment

Amprion is committed to a responsible approach to the environment. Amprion expects its suppliers to be aware of their impact on the environment and the consumption of natural resources. Attention must also be paid to the efficient use of energy.

Environmental impacts are to be reduced to a minimum. This applies in particular to the production, use and disposal of mercury (as defined by the Minamata Convention), persistent organic pollutants (as defined by the Stockholm Convention) and hazardous waste (as defined by the Basel Convention). At the same time, Amprion expects its suppliers to take additional measures to reduce their general waste volume and/or to recycle waste products as far as possible.

Excessive emissions of pollutants to air, water and soil must be avoided. This applies in particular if the emissions directly affect people's access to natural drinking water, sanitary facilities or food. In the case of water in particular, care must be taken to ensure that excessive consumption does not affect the supply of drinking water to people.

In the production and packaging of products, the focus must be on the use of renewable, recycled and/or reusable materials in the sense of a circular economy. This applies to raw materials, consumables and supplies as well as semi-finished products. Amprion encourages the use of renewable, recycled and/or reusable materials wherever possible. Suppliers are also expected to take steps to increase their share of renewable, recycled, and reusable materials in production in the medium and long term.

Amprion is committed to reduce greenhouse gas emissions both in its own business and in the wider supply chain. It is therefore expected that suppliers will also take appropriate measures to reduce greenhouse gas emissions.

Amprion expects that its suppliers also select their own suppliers according to the environmental criteria described here and thus avoid or at least minimize negative impacts on the environment through their value chain.

Simultaneously, Amprion contributes to the strengthening of environmental and sustainability aspects throughout the supply chain by incorporating the above-mentioned aspects into its (future) procurement decisions.

6 Reporting of misconduct and contact person

Amprion encourages both its own employees and those of its suppliers, as well as all other potentially affected parties along Amprion's supply chain to report inappropriate behaviour without fear of reprisal.

Information on violations in connection with this Supplier Code of Conduct and suspected cases of possible misconduct can be reported at any time to our compliance reporting system, which is an independent, impartial, and confidential reporting office:

Dr. Thomas Höch
Lawyer at Höch & Partner
Wittekindstraße 30
44139 Dortmund
Phone: +49 231 2222-7676
Email: ombudsmann@hoech-partner.de

Dr. Christoph Richter
Head of Risk Management/Compliance/
Data Protection
Robert-Schuman-Straße 7
44263 Dortmund
Phone: +49 231 5849-13100
Email: Christoph.Richter@amprion.net

Reports can also be submitted anonymously on request.

To ensure that breaches can be reported, Amprion expects its suppliers to refrain from any action that might cause a whistleblower to feel restricted. This includes the prohibition of investigative and retaliatory measures, threat, or similar actions.

Should the Supplier receive information relevant to Amprion via its own complaint procedure, he shall forward this information to Amprion immediately.