

## Code of Conduct for VARIO Suppliers

(June 2024)

Sustainability, as part of our corporate culture, is an integral component of our vision for a better future. As a family business, we operate with a focus on future generations and take responsibility as employers and business partners. This ambition should also be reflected in the management of our supply chain, which is why we expect every company, organization, or individual offering goods or services to VARIO (supplier) to adopt our commitments and adhere to the provisions outlined in this Code of Conduct.

VARIO is a member of the United Nations Global Compact (UNGC) and this Code of Conduct has been developed taking into account the importance of the Compact's Ten Principles in the areas of Human Rights, Labor, Environment and Anti-Corruption<sup>1</sup>. This includes the requirements and objectives set forth in the United Nation's Sustainable Development Goals (SDGs)<sup>2</sup>.

The provisions of this Code of Conduct set the minimum standards expected from VARIO suppliers. Their implementation should be consistent, and our suppliers are expected to proactively address the ethical, social, environmental, and other risks within the supply chain.

Our suppliers are expected to follow a precautionary approach to manage ethical, social, environmental and supply chain related risks.

In detail, we require our suppliers to adhere to the following:

### 1. Ethics<sup>3</sup>

#### 1.1 Compliance with the Law

The supplier shall comply with and be bound by all applicable laws, regulations, and rules, including but not limited to consumer protection laws, environmental laws, intellectual and industrial property laws, personal data laws, labor laws, laws against bribery and corruption, and laws promoting fair competition.

#### 1.2 Fair Competition

Adherence to the principles of fair competition is an absolute requirement for market-based economies that rely on economic efficiency, growth, and innovation. Therefore, suppliers must operate in accordance with the rules of free and fair competition and comply with all relevant antitrust laws.

#### 1.3 Prohibition of Corruption and Bribery

The supplier shall not tolerate any form of corruption, including bribery and extortion, nor engage in such activities in any form. This also includes any illegal offers of payments or similar benefits to national or international public officials or private sector decision-makers to gain preferential treatment or influence their decisions. No gifts or personal benefits that could be perceived as bribes should be offered to VARIO employees. Under no circumstances should gifts or other tangible assets be offered to influence the business relationship or violate applicable laws or ethical standards.

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<sup>1</sup> See the [Ten Principles](#) of the UN Global Compact

<sup>2</sup> See the [United Nation's Sustainable Development Goals](#)

<sup>3</sup> See the Ten Principles of the UN Global Compact: [Principle 10](#) Anti-Corruption



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#### 1.4 Anti-Money Laundering

The supplier shall comply with all applicable laws against money laundering and take the necessary measures to prevent money laundering activities. VARIO will only accept funds obtained from legal sources.

#### 1.5 Data Protection

The supplier shall manage and protect all personal data in accordance with the Data Protection Regulation (GDPR) passed by the European Union<sup>4</sup>.

#### 1.6 Confidentiality

The supplier shall respect the confidential business information of others and protect corresponding rights.

#### 1.7 Identification of Concerns

The supplier shall encourage and provide means for its employees to confidentially report concerns, complaints, or potentially unlawful activities at the workplace respectively in business activities without threat of reprisal, intimidation, or harassment. The supplier shall investigate such reports and take corrective action if needed.

### 2. Labor and Human Rights<sup>5</sup>

#### 2.1 Human Rights

The supplier shall respect the personal Dignity, Privacy and Human Rights of everyone. The protection of internationally proclaimed Human Rights<sup>6</sup> shall be respected and supported. Complicity in human rights abuses is to be prevented by the supplier.

#### 2.2 Inclusion and Diversity

The supplier shall encourage equal job opportunities and equal treatment of its employees regardless of color, nationality, social origin, potential disability, sexual orientation, political or religious belief as well as gender or age<sup>7</sup>.

#### 2.3 No Harassment and No Coercion

The supplier shall not tolerate behavior (including gestures, language and physical contact), which is considered sexual, threatening, abusive or exploitative.

#### 2.4 Fair Working Conditions

The supplier shall provide adequate compensation, ensure a legally fixed national minimum salary<sup>8</sup> and obey the legally fixed maximum working hours for the respective country<sup>9</sup>.

<sup>4</sup> [Regulation \(EU\) 2016/679](#)

<sup>5</sup> See the Ten Principles of the UN Global Compact: [Principles 1 – 6](#)

<sup>6</sup> Universal Declaration of Human Rights: <http://www.ohchr.org>

<sup>7</sup> ILO Convention 111: <http://www.ilo.org>

<sup>8</sup> See ILO Topic page on [Wages](#)

<sup>9</sup> ILO Convention 1: <http://www.ilo.org>



## 2.5 Prohibition of Forced Labor

The supplier shall not employ anybody against the will of the person concerned nor force anybody to work<sup>10</sup>. Practices such as extortion, for example through withholding someone's passport, or similar are not acceptable.

## 2.6 Prohibition of Child Labor

The supplier shall not employ anybody without proof that they are at least 15 years old. In developing countries that fall under the ILO convention 138 and are therefore exempt, the minimum age can be reduced to 14 years<sup>11</sup>.

## 2.7 Health and Safety

- i. The supplier shall provide adequate safety measures to effectively protect its employees against accidents, chemical, biological and physical hazards as well as occupational diseases – including appropriate staff training and personal protective equipment<sup>12</sup>.
- ii. The supplier shall identify and effectively prevent relevant risks and emergency situations in the workplace, public neighborhood and company-provided living quarters as well as ensure appropriate emergency plans, regular safety trainings and response procedures.

## 3. Product Safety

The supplier shall comply with product safety regulations, label products properly and communicate comprehensively product-handling requirements. In this course, the applicable documentation containing all necessary safety and ecologically relevant information for all hazardous substances shall be provided proactively to relevant parties in case of a legitimate need.

## 4. Environment<sup>13</sup>

### 4.1 Saving of Resources

The supplier shall develop products and services that contribute to reducing energy, water, and further raw material usage throughout their lifecycle.

### 4.2 Avoidance of Critical Ingredients

To protect life on Earth and in water (biodiversity), the supplier shall choose environmentally friendly raw materials.

### 4.3 Reduction of Waste

The supplier shall reduce waste, promote a circular economy through the production of recyclable products and packaging, and facilitate the recycling of valuable materials.

<sup>10</sup> ILO Convention 29: <http://www.ilo.org>; Modern Slavery Act 2015

<sup>11</sup> ILO Convention 138: <http://www.ilo.org>

<sup>12</sup> ILO Convention 155, 161, 187: <http://www.ilo.org>

<sup>13</sup> See the Ten Principles of the UN Global Compact: [Principles 7 – 9](http://www.unep.org); Rio-Declaration: <http://www.unep.org>



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#### 4.4 Reduction of Greenhouse Gas Emissions

The supplier shall effectively reduce carbon dioxide emissions related to their business activities. Among other things the supplier shall provide products and services characterized by low energy consumption and CO2 emissions reduction throughout their lifecycle. The supplier shall also promote and select consolidated orders to reduce the carbon footprint from product transportation.

#### 4.5 Corporate Environmental Management System

- i. The supplier shall adhere to legal requirements and monitor international standards related to environmental protection.
- ii. The supplier shall implement an environmental management system based on international standards, such as ISO 14001.

### 5. Supply Chain

#### 5.1 Sub-Contractors

The supplier shall follow the above-stated requirements and standards, committing to and evaluating its subcontractors consistently.

#### 5.2 Supply Chain Regulation

The supplier shall comply with all applicable laws and regulations regarding the management of its supply chains, for example any social or environmental due diligence obligations or special specifications, such as the EU conflict mineral regulation<sup>14</sup>.

#### 5.3 Local Communities

The supplier shall respect the economic, social, and environmental concerns of the residents in the area where it operates, which are related to its activities.

### 6. Transparency and Disclosure

#### 6.1 Sustainability Reporting

The supplier shall ensure that it discloses accurate information about its actions and interacts with others, encouraging its partners to act with the same transparency.

#### 6.2 Product Data Provision

The supplier shall provide relevant data for each product throughout its lifecycle to enable proper and timely customer updates.

#### 6.3 Compliance Monitoring and Audits

The supplier should provide VARIO with all required information and details that demonstrate compliance with the provisions of this Code of Ethics and immediately inform VARIO of any non-compliance incident or event, including any legal actions, administrative investigations, or prosecutions that may affect their relationship with VARIO or adversely affect VARIO's reputation. VARIO is entitled to conduct a thorough investigation or audit of the supplier to verify compliance with the above.

<sup>14</sup> [Regulation \(EU\) 2017/821](#)



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## Supplier Declaration (Code of Conduct for VARIO Suppliers)

With this document, we confirm the following:

1. We have received the "Code of Ethics for VARIO Suppliers" (hereinafter referred to as the "Code of Ethics") and commit to comply with the principles and requirements of the Code of Ethics, where applicable beyond our obligations under our commercial agreements.
2. We acknowledge that the provisions outlined in this Code of Ethics for suppliers constitute an essential element for the selection and evaluation of suppliers.
3. We will communicate the content of this "Code of Ethics" to our suppliers and subcontractors, ensuring their compliance with these principles and requirements.
4. In the event of a breach of the principles and requirements contained in the "Code of Ethics" by us, we will promptly inform VARIO. In cases of public allegations, such as in the mass media, of alleged violations of the principles and requirements contained in the Code of Ethics or any other incident that could potentially harm VARIO's reputation, we will provide VARIO, upon request, with an immediate written statement from the company in response to such allegations.
5. We accept that VARIO has the right to cancel existing supplier contracts and/or purchase orders in writing, without prior notice or compensation, if:
  - i. They violate the principles and requirements of the Code of Ethics, or
  - ii. They do not adequately fulfill our obligations for cooperation.
6. We agree that this declaration is subject to the same legislation, legal procedures, and jurisdiction that have been agreed upon for supplier contracts. In cases where such agreements do not exist, this declaration is subject to the applicable legislation, legal procedures, and jurisdiction of VARIO's headquarters.
7. We agree that VARIO may revise and amend the above Code in accordance with changes in relevant legislation, United Nations Sustainable Development Goals, or United Nations Global Compact Principles. In such a case, VARIO will inform us accordingly.

Place, Date

For the Supplier

For VARIO

Name & Signature Company Stamp

Panagiotis Papadimitriou  
Managing Director



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