PREAMBLE

The Poppe-Veritas Group, comprising Veritas AG and Poppe GmbH and their respective affiliated companies, ranks as a global leader in the production and processing of rubber, plastics and metal in the automotive sector. In our business activities, we cooperate with suppliers of services, and suppliers of direct and indirect materials ("Suppliers") all over the world. We believe that our Suppliers are a vital part of all of our business. Accordingly, we require our Suppliers to share our values and to take part in our sustainability strategy. Therefore, we have implemented this Supplier Code of Conduct, which is binding for all Suppliers having a business relationship with the Poppe-Veritas Group.

This Supplier Code of Conduct supplements any contractual arrangement made between a Supplier and the Poppe-Veritas Group. Should there be a conflict of terms between this Supplier Code of Conduct and the specific arrangement, the terms of such other arrangement shall prevail.

SUPPLIER CODE OF CONDUCT

All Suppliers to the Poppe-Veritas Group are expected to comply with the following principles:

1. Duty of Legality

Our Suppliers adhere to all applicable laws and regulations.

2. Respect of Human Rights

Our Suppliers respect internationally recognized human rights and comply with conventions, treaties and laws protecting these human rights and fundamental freedoms, and ban any form of modern slavery.

3. Ban on Forced Labor

The principle of freely chosen employment is a cornerstone of ethical and sustainable business. Therefore, all of our Suppliers reject forced labor and ensure that all of their own suppliers being part of the supply chain of the Poppe-Veritas Group adhere to the same principles.

4. Ban on Human Trafficking

Our Suppliers reject practices of human trafficking and strictly avoid any business activity that could – even remotely – be connected to consequences of such practices.

5. Ban on Child Labor

Our Suppliers refrain from the use of child labor und do only cooperate with third parties which also adhere to the core labor standards of the international community in this area.

6. Appropriate Labor Practices

Our Suppliers provide appropriate labor practices for their workforce. This includes respecting the applicable laws regarding labor issues like minimum wages, working conditions, work hours and vacation days.

7. Fair Remuneration

Our Suppliers fairly compensate their employees and refrain from establishing practices of unpaid overtime work or willfully paying wages below the minimum subsistence level.
8. Non-Discrimination

Our Suppliers do not discriminate in any way against anyone based on race, color, religion, gender or gender identity, age, national origin, sexual orientation, marital status, veteran status, disability or any other characteristic protected by law.

9. Freedom of Association

Our Suppliers comply with the applicable legal framework regarding the freedom of association of their workforce and do not limit or suppress any activities in the area of employee representation, e.g. the foundation of work councils.

10. Cooperation with Collective Bargaining Efforts

Our Suppliers provide a fair framework for earnest and open-minded negotiations with representatives of the employees in matters of collective bargaining. They do not attempt to limit or adversely affect any collective bargaining efforts of their workforce.

11. Data protection

Our Suppliers use personal data only to the extent they are indispensable for the purpose of an efficient processing or this is required by legal provisions.

12. Anti-Corruption and Anti-Bribery

Our Suppliers comply with all relevant legislation, including but not limited to the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and other applicable anti-corruption laws wherever they do business. They refrain from improperly offering anything of value to government officials or private citizens with the goal of securing business opportunities or other advantages. Additionally, they request the same integrity from all third parties with whom they have business relationships.

13. Conflict of Interest

Our Suppliers will avoid all activities or situations which might result in conflicts between the private interests of any employee of the Poppe-Veritas Group or any Supplier and the business interests of the Poppe-Veritas Group. As soon as a Supplier becomes aware of a conflict of interest, it shall inform the compliance organisation of the Poppe-Veritas Group without undue delay (email: compliance@veritas-ag.de).

14. Maintaining Health and Safety

Our Suppliers adhere to all relevant laws and regulations relating to work safety and health protection and strive to provide a safe and hygienic working environment for their employees. Additionally, they shall maintain a management system for occupational health and safety issues.

15. Environmental Protection

Our Suppliers adhere to all applicable laws and regulations as well as international standards relating to the protection of the environment. They minimize any negative impact their business might have on the environment and avoid a wasteful handling of resources.

16. Recording and Disclosure of Information

We require our Suppliers to prepare the records regarding their business and finances in a correct and exact manner. They disclose the information about the business activities, structure, financial situation,
and performance of their respective company in accordance with applicable regulations and prevailing industry practices.

17. Conflict Minerals

Our suppliers take a responsible approach in the use of raw materials like tin, tantalum and tungsten, their ores and gold (so-called conflict minerals). They know that the mining of such minerals, in particular in the Democratic Republic of Congo and adjoining countries, may finance violent conflicts and result in human rights abuses. Therefore, we expect that our suppliers when using such minerals comply with the requirements of the US law as laid down in the Dodd-Frank Wall Street Reform and Consumer Protection Act as well as with those of the EU Union system. We support the OECD Due Diligence Guidance for Responsible Supply Chains for conflict minerals. All suppliers are expected to avoid the supply of such minerals from conflict-affected and high-risk areas and to disclose to us sufficient information in relation to conflict minerals in their own and in their respective suppliers’ supply chain up to smelters and refiners.

18. Counterfeit Parts

Our Suppliers make efforts to develop, implement and maintain effective methods and processes which are suitable for their products, in order to avoid the risk that counterfeit parts and materials are added to their products to be supplied. In addition, the Suppliers undertake if appropriate to inform the recipients about counterfeit parts and to exclude such parts from the delivery object.

19. Compliance with the Supplier Code of Conduct

To ensure compliance with the Supplier Code of Conduct, the Poppe-Veritas Group in its discussions with Suppliers from time to time reviews the efforts of the Suppliers relating to the underlying principles of the Supplier Code of Conduct. In addition and on a regular basis, the Poppe-Veritas Group will request its Suppliers to perform a self-assessment relating to the Supplier Code of Conduct and report to the Poppe-Veritas Group on this self-assessment. Furthermore, in case there are facts or circumstances justifying the assumption of a breach by a Supplier of its obligations under this Supplier Code of Conduct in relation to the Poppe-Veritas Group, the Poppe-Veritas Group, to the extent legally permissible, has the right to perform an audit of Suppliers in matters governed by this Supplier Code of Conduct.

Any violation of the principles contained in this Supplier Code of Conduct constitutes a significant breach of the contractual obligations of the Supplier towards the Poppe-Veritas Group. In such case, the Poppe-Veritas Group reserves the right to trigger appropriate ramifications, including but not limited to an extraordinary termination of any contractual relationship between the Supplier and the Poppe-Veritas Group.

We expect our Suppliers to give their employees the opportunity to raise legal or ethical issues and concerns, also in anonymous form, without fear of suffering retaliation measures. In addition, the Suppliers are expected to take measures for preventing, detecting and removing retaliation, if any.