

# WashTec Supplier Code of Conduct.





# 1. Preamble

The WashTec Group<sup>1</sup> (hereinafter also referred to as **“WashTec”** or **“we”**), based in Augsburg, Germany, is the leading provider of innovative carwash solutions. WashTec employs around 1,800 people worldwide and has subsidiaries in the markets of Europe, North America and Asia/Pacific.

We are proud to work with business partners worldwide. Our goal is to make the business relationship as beneficial, reliable and sustainable as possible, for both sides. The principles of sustainable and responsible corporate governance – long-term responsibility towards our business partners, the environment, society and our employees – are therefore essential criteria for our conduct.

Our long-term success requires strict compliance with all applicable laws and regulations and the maintenance and development of high ethical standards in our business activities. We expect the same from our business partners – including along their own supply chains.

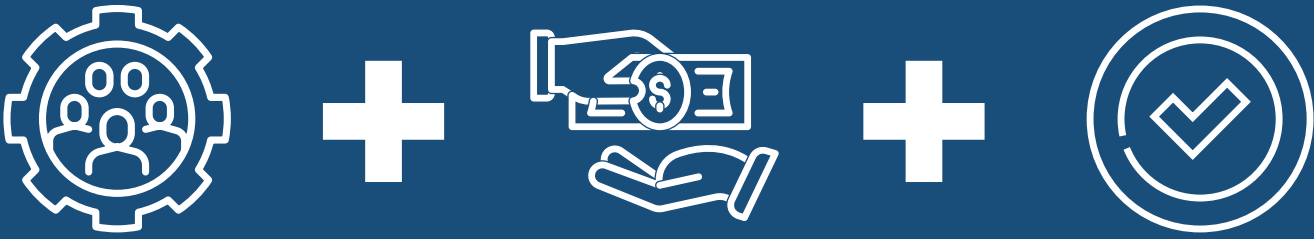
<sup>1</sup> “WashTec” refers to WashTec AG and the WashTec Group companies it controls



## 2. Scope of application

The WashTec Supplier Code of Conduct sets out requirements for our direct suppliers and service providers (“**Suppliers**”) for legally compliant and sustainable business conduct.

The Supplier complies with the requirements of this Supplier Code of Conduct in its business activities and makes reasonable efforts to ensure compliance with these requirements along its supply chains.



# 3. Requirements

## 3.1. Ethical business conduct

### Compliance with the law

All WashTec suppliers must comply with all laws, rules, regulations and other provisions of the legal systems to which they are subject.

The Supplier commits to the United Nations International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the ten principles of the UN Global Compact and the internationally recognized core labor standards of the International Labour Organization (ILO).

### Avoidance of conflicts of interest

The Supplier takes reasonable precautions against conflicts of interest among its governing bodies and employees and discloses potential conflicts of interest that affect the business relationship with WashTec.

### Fair competition

The Supplier operates in compliance with competition and antitrust law. In particular, the Supplier does not engage in price fixing, market sharing agreements, capacity agreements or bid rigging with competitors, does not divide sa-

les territories or assign customers or operate any fixed-price regime in violation of antitrust law, and does not abuse any dominant market position.

### Corruption

The Supplier adheres to the highest standards of integrity. The Supplier does not practice or tolerate corruption and complies with the applicable anti-corruption laws. In particular, any active giving of inducements or bribery and any passive acceptance of inducements or bribery are prohibited.

### Protection of business secrets

WashTec's confidential information and business secrets may only be disclosed to those for whom they are intended. The Supplier places its governing bodies and employees under obligation to protect business secrets and ensures this protection by means of appropriate security precautions, including with regard to IT systems, and appropriate training. In particular, business secrets may not be published, passed on to third parties or made available in any other form without authorization.



#### **Data protection**

The Supplier complies with all applicable laws for the protection of personal data (including, in particular, that of employees, contractors and customers).

#### **Intellectual property**

The Supplier protects WashTec's intellectual property and respects the intellectual property of third parties. No products may be supplied to WashTec that infringe the intellectual property rights of third parties.

#### **Foreign trade regulations**

The Supplier complies with the rules and regulations on foreign trade, customs and sanctions and, in particular, ensures strict compliance with all applicable laws on the import and export of goods and services.

#### **Money laundering and terrorist financing**

The Supplier ensures compliance with the applicable laws, rules and regulations for the prevention of money laundering and terrorist financing.



## 3.2 Environmental responsibility

### **Compliance with applicable environmental rules and regulations**

The Supplier complies with all applicable environmental laws and other environmental regulations. The Supplier makes reasonable efforts to minimize negative environmental impacts of its business activities and as far as possible to conserve natural resources and avoid adverse effects on biodiversity.

### **Handling of hazardous substances**

When using hazardous substances, the Supplier ensures due consideration and appropriate management of the risks to people and the environment. In particular, the Supplier complies at all times with the requirements of the Minamata Convention (use of mercury), the Stockholm Convention (persistent organic pollutants) and the Basel Convention (transboundary movements of hazardous wastes and their disposal).

### **Waste and recycling**

The Supplier avoids or reduce waste as far as reasonably possible. The applicable legal requirements are complied with in waste disposal.



### 3.3 Social responsibility

#### Human rights

For WashTec, respect for internationally recognized human rights is fundamental to all business relationships. The Supplier undertakes to uphold and actively comply with all internationally recognized human rights.

#### Anti-slavery and human trafficking

The Supplier rejects all forms of forced and compulsory labor and all forms of modern slavery and human trafficking. The Supplier respects the principle of free choice of employment, including the freedom of employees to terminate their employment relationship, subject to reasonable notice.

#### Prohibition of child labor and protection of young employees

The Supplier respects and observes the rights of children and young people. The Supplier ensures that it employs only workers who are not subject to compulsory schooling in the jurisdiction where they employed, and who are at least 15 years of age, unless the law in the jurisdiction where they are employed stipulates otherwise in accordance

with the core labor standards of the International Labour Organization (ILO).

The Supplier also ensures that young employees under the age of 18 do not work overtime or at night. They must be protected from working conditions that are detrimental to their safety, health, morale or development.

#### Right to fair pay

The Supplier provides its employees with fair pay. This at least equals the minimum wage under applicable law.

#### Freedom of association

The Supplier recognizes the right to freedom of association and the right to form employee representative bodies and grants its employees the right to represent their interests on the basis of the applicable national legislation. Employees suffer no disadvantage if they make use of these rights.

#### Working hours

The Supplier complies with the rules and regulations on working hours, overtime, breaks and regular vacations applicable at the place of employment.

**Non-discriminatory environment**

The Supplier avoids any form of unjustified unequal treatment (discrimination) of its employees.

**Workplace safety and health**

The Supplier complies with the applicable health and employment laws, rules and regulations. The Supplier ensures safe working conditions for its employees and takes precautions against health hazards as far as possible. Physical and psychological harassment and violence in the workplace are not tolerated.

**Land seizure**

The Supplier complies with the prohibition to unlawfully evict or take land, forests and waters when acquiring, developing or otherwise using land, forests and waters, the use of which secures the livelihood of a person.

**Handling of conflict minerals**

The Supplier complies with the applicable rules and regulations on the handling of conflict minerals and seeks to source raw materials responsibly while respecting human rights and the environment.





## 4. Implementation of the requirements

### 4.1. Notification obligation and verification rights

The Supplier undertakes to notify WashTec in writing without delay of any material incident including, in particular, any non-compliance or suspected non-compliance with this Supplier Code of Conduct. In the event of any suspected non-compliance, the supplier undertakes, on request, to immediately investigate the matter and to inform WashTec accordingly. The Supplier undertakes to answer questions regarding compliance with and implementation of this Supplier Code of Conduct completely and truthfully.

WashTec reserves the right to verify compliance with this Supplier Code of Conduct, for example by inspecting relevant documents or, with prior notice, conducting visits and/or on-site audits, including through third parties under obligation of confidentiality. The Supplier undertakes to cooperate in such activities in an appropriate scope.

### 4.2. Remedial measures

In the event of imminent or actual non-compliance with the Supplier Code of Conduct, the Supplier undertakes to take appropriate remedial action without delay to prevent or end the non-compliance. WashTec may require the Supplier to draw up and implement a plan to remedy any non-compliance with the Supplier Code of Conduct. The plan must include a concrete timetable that is appropriate to the nature and severity of the non-compliance.



# 5. Grievance mechanism

We encourage our suppliers and their employees to report potential human rights or environmental risks or violations. For this purpose, an electronic whistleblower system is available, which can also be used by external parties. Information can be submitted confidentially and, if desired, anonymously on the whistleblower system website. A grievance and reporting procedure, available on our website at <https://ir.washtec.de/en/corporate-governance/> describes the whistleblower system and ensures proper investigation of any suspected human rights or environmental risks or violations. This procedure is standardized for the entire WashTec Group.

