

Code of Conduct for Suppliers



Integrity. Values. Cooperation.



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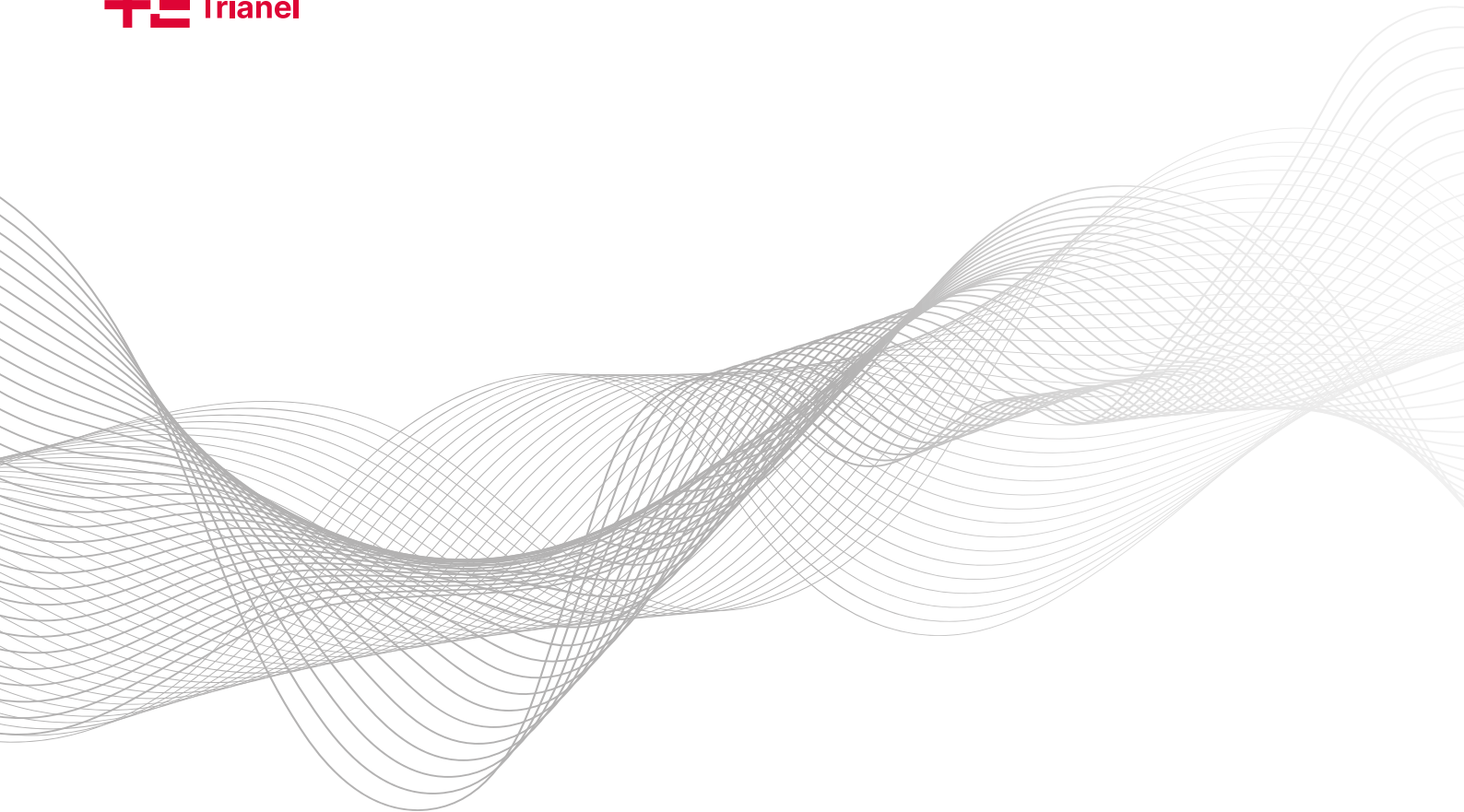
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Introduction

For the leading municipal utility cooperation Trianel GmbH (hereinafter: Trianel), taking responsibility for our society and the environment is essential and a matter of course. As a driving force in the renewable energies sector, Trianel contributes to sustainably shaping the present and the future by acting in an economically, ecologically, socially and legally responsible manner. The principles of fair play, transparency and respect guide Trianel in all its activities.

In order to ensure economic, ecological and therefore successful collaboration, Trianel expects its suppliers to comply with all relevant legal and ethical requirements and to adhere to recognised environmental, social and corporate governance standards.

Principles and scope

It is essential that we, as Trianel, and our suppliers, comply with the standards set out in the following legislation and guidelines:

- The German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz (LkSG))
- The Universal Declaration of Human Rights
- The Ten Principles of the UN Global Compact
- The European Convention for the Protection of Human Rights and Fundamental Freedoms
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights of Work
- The UN2030 Agenda for Sustainable Development and Sustainable Development Goals (SDGs).

In addition, national and international resource and territorial rights shall apply in a complementary manner.

As Trianel, we are committed to the requirements and principles set out in this Code of Conduct and use them as the basis for our contractual obligations and as a guideline for our collaboration. These create the framework for constructive collaboration and the responsible use of resources and the environment. We therefore require our suppliers to adhere to and implement these principles in the same way. Non-compliance will not be tolerated.

Code of Conduct for Suppliers

Human rights standards



Human rights

The internationally recognised principles of the United Nations Universal Declaration of Human Rights underpin all our activities and must be respected and actively promoted by our suppliers. Any involvement in, or acquiescence to human rights violations by our suppliers will not be tolerated.

No child labour

Child labour is strictly prohibited and will not be supported under any circumstances. Our suppliers are expected to respect the principles of the International Labour Organization and to comply with the minimum age required to perform work in accordance with applicable law.

No forced labour

Our suppliers must not use or tolerate any form of forced, bonded or other involuntary labour, or impose restrictions on the freedom of movement of workers.

Health and safety measures and minimum wage

Our suppliers must ensure that all safety standards are met, both at the workplace and for workers, and must provide the necessary protection and safety equipment. This includes organising operations in accordance with ILO standards on working hours, breaks and rest periods.

Work must be fairly remunerated. A fair wage is at least the minimum wage required by law and sufficient to meet the basic needs of the workers.

Freedom of association

Suppliers shall respect the right of workers to freedom of association and assembly. Our suppliers' workers must be able to organise, assemble and bargain collectively within the legal framework.

Equal treatment

Our suppliers are required to comply with all equal treatment legislation, in particular Germany's General Act on Equal Treatment (Allgemeine Gleichbehandlungsgesetz (AGG)). Diversity and equality must be promoted, and fair and open interaction between and with each other must be encouraged. Our suppliers shall not engage in any form of harassment, unequal treatment or discrimination, in particular on the basis of origin, gender, politics, race, religion, ideology, disability, age or sexual orientation.

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Ethical business practices



Fair play

Our suppliers agree to conduct their business ethically and in accordance with all applicable rules and regulations. They will not engage in any activity that could be perceived as restricting or manipulating competition. This includes, but is not limited to, price-fixing or promoting the intentional allocation of market segments or customers.

Preventing money laundering

Our suppliers are required to comply with, and actively participate in, applicable anti-money laundering and anti-terrorist financing laws and regulations.

Anti-corruption

Anti-corruption laws must be complied with. Our suppliers must prevent their employees from offering, promising or giving benefits to other companies or their employees in order to influence actions or gain an improper advantage. In particular, dealings with public officials, donations and sponsorship must be conducted in accordance with the law and must be transparent and objectively verifiable.

Conflicts of interest

Situations in which the personal interests of employees or management appear to influence an impartial decision shall be avoided.

If such a situation cannot be avoided, precautions must be taken to prevent or mitigate a conflict of interest. If a conflict of interest arises, it must be promptly disclosed and mitigating measures developed.

Data protection and privacy

Our suppliers shall ensure that individuals' rights to informational self-determination are not compromised. Our suppliers must comply with applicable data protection and information security laws. The technical systems used by our suppliers to process data must comply with legal requirements.

Where our suppliers have received information about us in any form, including but not limited to commercial and/or technical information, specifications, documents, customer, pricing and/or other business information, such information shall be treated as strictly confidential. This shall apply even if such information has not been expressly designated as such and to all agreements between our suppliers and third parties which are made available to such third parties.

Export and customs regulations

We expect our suppliers to carefully review and comply with applicable foreign trade regulations. In particular, our suppliers shall not violate any embargoes or economic sanctions imposed by the United Nations or the Federal Republic of Germany within the meaning of the Foreign Trade and Payments Ordinance or any similarly applicable anti-boycott law.

Security personnel

Our suppliers may only use private or security services to protect the business if it is ensured that the use of security services does not result in a violation of the prohibition of torture and cruel, inhuman or degrading treatment or pose a threat to life and limb or freedom of association, as directed or controlled by the relevant supplier. Where security services are used, measures must be taken to minimise the above risk.

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Environmental standards



Environmental protection

Our suppliers shall be committed to environmental protection and shall carry out their activities in an ecologically responsible manner with the lowest possible emissions. The quality of water, soil and air must not be adversely affected. Our suppliers shall take appropriate and transparent measures to ensure environmental protection. They are therefore encouraged to implement the latest technical standards to maximise resource efficiency.

Waste disposal and handling hazardous substances

Reducing the impact on the environment and people, as well as using resources wisely, should also lead to a reduction in the amount of material that needs to be disposed of. Wherever possible, materials that need to be disposed of should be recycled or reused. If this is not possible, or if the material to be disposed of is hazardous, it is expected that it will be properly stored or disposed of.

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Implementation



Obligation

Our suppliers confirm that they will meet the expectations set out in this Code of Conduct and will address them appropriately in their own supply chain.

Whistleblowing and complaints management

As Trianel, we have established a complaints procedure for reporting violations of this Code of Conduct or applicable law, which is available to anyone and through which information about violations can be submitted.

Information submitted will be treated confidentially and in accordance with the applicable data protection regulations. Our suppliers will establish their own whistleblowing and complaints management procedures. Any information received by the supplier that appears reasonably likely to indicate the existence of a violation must be reported to us immediately.

Corrective action

In the event of non-compliance with this Code of Conduct, our suppliers shall take immediate corrective action. If immediate corrective action is not possible and will not be possible in the foreseeable future, a corrective action plan outlining the nature and timing of the corrective action shall be developed immediately. The corrective action plan shall be made available to us upon request.

Supervisory measures

Compliance with the Code of Conduct and the implementation of any remedial actions may be reviewed by us on an ad hoc basis. This may be the case, for example, where we receive information, a suspicious activity report or other knowledge of circumstances that would warrant referral to the complaints management system. In such cases, we will have the right, subject to reasonable notice, to request information and other data from affected suppliers or third parties, or to conduct an audit, subject to reasonable notice. The parties involved will be given a reasonable period of time to cooperate.

Consequences of infringements

We reserve the right to demand corrective action and, if necessary, to suspend or terminate the relationship if the requirements are not met. This right is particularly applicable in the event of repeated and serious breaches.

Prior to termination, suppliers must be given a reasonable time to remedy the breach or, if this is not possible within a reasonable time, to minimise the breach.

In the event of an intentional or grossly negligent breach by our suppliers, and where, taking into account all the circumstances, it is unreasonable to expect the business relationship to continue, we shall be entitled to terminate the business relationship without notice.

Contacts for compliance issues or reporting non-compliance

If you have any questions about the Trianel Code of Conduct for Suppliers or its defining regulations, or any other compliance-related questions, please contact your supervisor or the Compliance department.

Staff members should also contact the Compliance department in confidence if there are any indications of non-compliance. If requested, all questions and information will be treated in the strictest confidence.

Our central Compliance contact is Erwin Dautzenberg.

Erwin Dautzenberg – Phone +49 241 4 13 20-231

→ compliance@trianel.com

Human rights officer:

If there is reasonable suspicion of a (possible) case of non-compliance, Trianel employees and any other person can contact the external human rights officer confidentially, anonymously and free of charge.

Trianel does not tolerate any reprisals or discrimination against anyone who has raised compliance concerns based on reasonable grounds and in good faith.

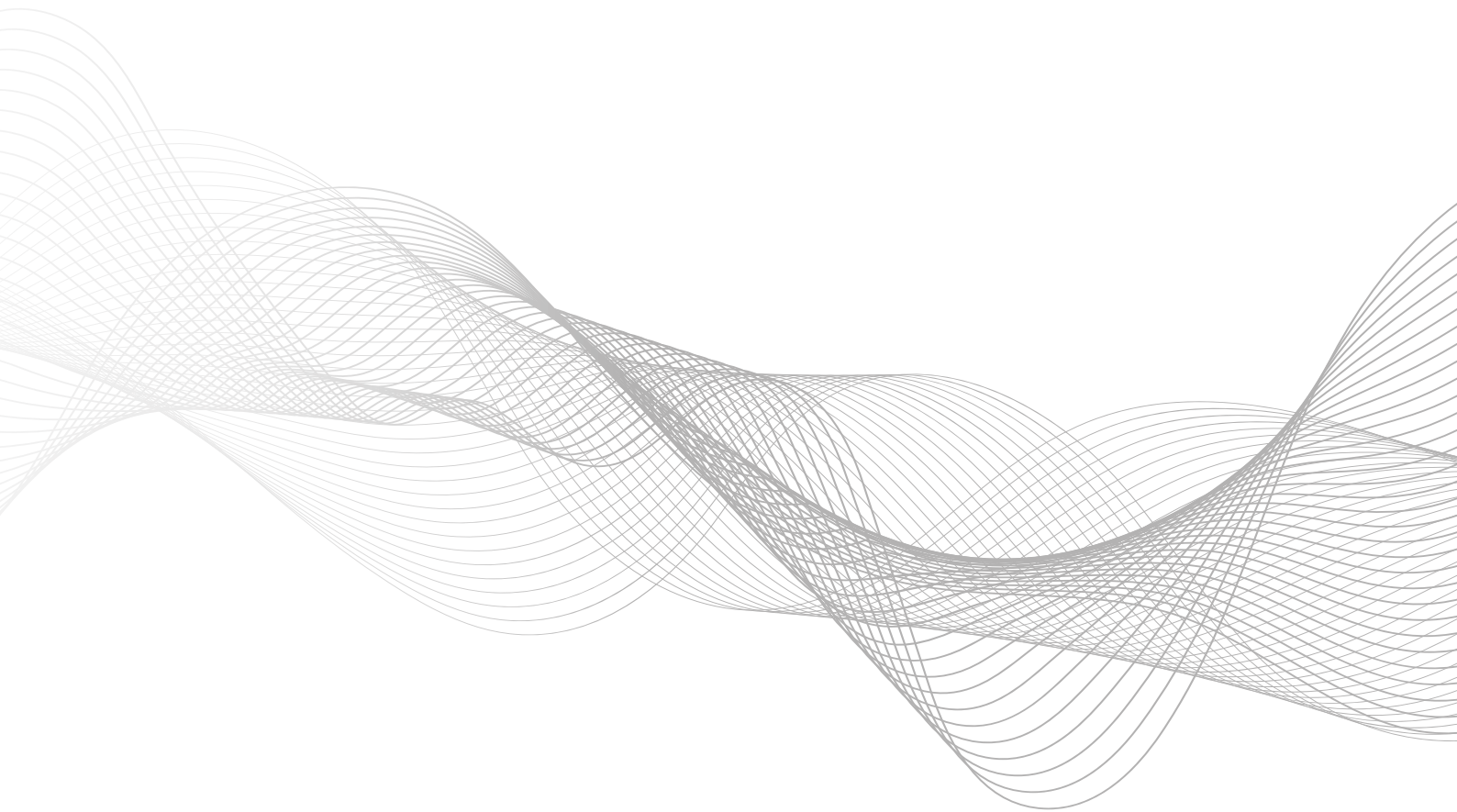
Contact:

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