



# SUPPLIER CODE OF CONDUCT

BUHLMANN Group



# DEAR COLLEAGUES

The BUHLMANN Group is a premium trading company for steel pipes, pipe fittings and accessories all over the world and is characterized by quality and global service. Not least due to its strategy of inorganic growth, the BUHLMANN Group's position goes hand in hand with a great deal of responsibility – towards business partners, employees, society and the environment.

In order to master the challenges of the globalized economy and meet and fulfill this great responsibility, this Supplier Code of Conduct provides orientation. It is based on the principles of the BUHLMANN Group with regard to legal, social, ethical and ecological requirements. The code includes standards on human rights, business ethics, environmental protection and safety.

We expect this Code to be respected and followed by all stakeholders, including employees, managers and business partners. If you have any questions or concerns, or in the event of any violations, we encourage you to bring these to our attention immediately. The Code is not just a guideline, but a shared commitment to our values and principles.

The management of the BUHLMANN Group



## 1. SCOPE OF APPLICATION

The principles formulated in this Supplier Code of Conduct form an integral part of the contractual relationship between BUHLMANN and all suppliers, contractual partners and other business partners (hereinafter referred to as 'suppliers'). Furthermore, we expect all suppliers of the BUHLMANN Group to comply with and implement these standards in their own company and to ensure compliance with and implementation of these standards in their own supply chain.

## 2. GUIDELINES

### 2.1 Social responsibility and respect for human rights

#### 2.1.1 Prohibition of forced labour

BUHLMANN does not tolerate forced labour within the meaning of ILO Convention No. 29, i.e. all work must be voluntary and without threat of punishment. We do not tolerate any form of slavery or slave-like practices, serfdom or other forms of domination or oppression, e.g. through extreme economic or sexual exploitation and humiliation in the workplace. Our suppliers are obliged to observe this prohibition at all times and to ensure that no form of forced labour or slavery is used or tolerated in their downstream supply chains.

#### 2.1.2 Prohibition of child labour

Child labour in any form is not tolerated in our supply chain. The definition of child labour is based on the guidelines of the International Labour Organisation (ILO, No. 138). If a local law prescribes a higher legal minimum age for workers or a longer compulsory schooling period, the higher age/stricter regulation applies.

#### 2.1.3 Fair remuneration

BUHLMANN expects its suppliers and business partners to pay remuneration to employees regularly, on time and in full, without exception, in accordance with applicable laws. It must be in accordance with national laws on remuneration and at least comply with the laws on minimum wages. Deductions from wages as part of disciplinary measures are not permitted. The level of remuneration is based on the applicable national laws. It must be ensured that the remuneration paid out covers the basic needs of employees and their families.

#### 2.1.4 Fair working conditions

The supplier is obliged to create a working environment in which harassment and unlawful discrimination are not tolerated.

#### 2.1.5 Fair working time

Working hours must comply with applicable national laws or industry standards.

#### 2.1.6 Diversity and inclusion

Unequal treatment of employees in any form is not permitted. In particular, no one may be discriminated on the basis of gender, national, ethnic or social origin, skin colour, disability, health status, political conviction, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are to be respected.

#### 2.1.7 Freedom of association

In accordance with ILO No. 87, workers have the right to form and join organisations of their own choosing without prior authorisation. Forming, joining and being a member of a trade union are no reason for unjustified discrimination or retaliation.

#### 2.1.8 Preserving the natural foundations of life

Unlawful eviction, unlawful deprivation of land, forests and waters is prohibited. Harmful changes to the soil, water and air pollution, noise emissions and excessive water consumption must be avoided if this harms the health of people, significantly impairs the natural basis for food production or prevents people from having access to safe drinking water or sanitary facilities.

#### 2.1.9 Conflict minerals

The supplier shall ensure that the products delivered to BUHLMANN do not contain metals extracted from minerals or their derivatives that originate from conflict-affected or high-risk regions where they contribute directly or indirectly to the financing or support of armed groups and the violation of human rights. Suppliers are expected to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG) and other applicable regulations, such as the EU Conflict Minerals Regulation ((EU) 2017/821).

#### 2.1.10 Local communities and vulnerable groups

The supplier shall respect applicable local, national, international and traditional land, water and resource rights. In particular, the rights of local communities, as well as the rights of the indigenous population and other vulnerable and disadvantaged groups, shall be respected, promoted and protected. The supplier shall obtain the prior, voluntary and informed consent of the indigenous population to intended business activities and the manner in which they are carried out. Illegal displacement and confiscation of land is not accepted.

## 2.2 Health protection and occupational safety

### 2.2.1 Health protection and safety in the workplace

Suppliers are responsible for a safe and healthy working environment for their employees. The work processes must be organised in such a way that accidents are excluded as far as possible. Suitable measures must be taken to prevent excessive physical or mental fatigue. In addition, employees are to be regularly informed and trained on applicable health and safety standards and measures. Employees are to be given access to sufficient quantities of drinking water and access to clean sanitary facilities.

### 2.2.2 Process safety

The supplier must implement safety programmes and management systems to control and maintain all work processes in accordance with the applicable safety standards. The programmes must be adapted to the operating site and the process risks. The supplier must adequately communicate, disclose and control process and product inherent risks to ensure that affected or potentially affected third parties are protected. In addition, major incidents must be analysed and communicated promptly. For hazardous equipment and processes, the supplier must regularly perform specific risk assessments and take measures to prevent incidents such as chemical leaks, fires and/or explosions.

### 2.2.3 Product safety

The supplier must comply with all applicable product safety regulations. This includes the legal requirements regarding safety, labelling and packaging of the products, as well as the use of hazardous substances. If required, the supplier must provide the parties involved with the relevant documentation containing all necessary safety-relevant information. This includes product information, safety data sheets, notification and authorisation confirmations, uses and exposure scenarios. The supplier shall proactively and transparently inform all parties involved about the health, safety and environmental aspects of its products.

### 2.2.4 Emergency preparedness, risk information and training

The supplier shall provide employees and contractors with safety information on identified risks in the workplace. The legal requirements form the basis for this and are to be understood as a minimum requirement. Employees and contractors are to be continuously trained accordingly to ensure that they are adequately protected at all times. Relevant risks and emergency situations at the workplace, in the neighbourhood and in the accommodation provided by the company must be identified and assessed. Their potential impact must be minimised through the provision of ad-

equated fire protection, effective emergency plans, regular drills and the corresponding reporting procedures.

## 2.3 Ecological responsibility

### 2.3.1 Natural resources and environmental protection

The supplier is obliged to use natural resources responsibly and to contribute to the careful consumption of energy, water and fuels. National and international environmental standards and laws must be complied with. Natural resources should be protected through practices such as material reduction and substitution, shared use, maintenance, re-use, remanufacturing and recycling, and by modifying production processes. Everyone in our supply chain should be committed to the continuous development and use of environmentally and climate-friendly products, processes and technologies.

### 2.3.2 Environmental management system

BUHLMANN expects compliance with applicable local environmental laws, regulations and standards. Furthermore, everyone in our supply chain should endeavour to establish and apply an appropriate environmental management system (e.g. in accordance with ISO 14001). This applies in particular to suppliers with their own production sites. Environmental pollution and hazards should be minimised and environmental protection established and improved in daily business operations. Corresponding evidence and reporting should be available on request.

### 2.3.3 Treatment and discharge of industrial wastewater

Wastewater from operational procedures, production processes and sanitary facilities must be standardised, monitored, checked and, if necessary, treated prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

### 2.3.4 Dealing with air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions must be standardised, routinely monitored, checked and, if necessary, treated before they are released. The supplier is also responsible for monitoring its emission control systems and is required to find cost-effective solutions to minimise any emissions.

### 2.3.5 Handling of waste and hazardous substances

The supplier shall follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989, as amended, must be observed. Chemicals or other materials that pose a risk when released into the environment shall be identified and

managed in a manner that ensures safety during handling, transport, storage, use, recycling or reuse and disposal. Mercury shall be used in accordance with the prohibitions of the Minamata Convention and persistent organic pollutants in accordance with the Stockholm Convention.

Service providers who provide services on the BUHLMANN premises are obliged to comply with the requirements expected by BUHLMANN when handling waste and hazardous substances (TRGS510) and to report any environmental damage immediately.

### **2.3.6 Reducing consumption of raw materials and natural resources**

The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced. This can be done either directly at the point of origin or through procedures and measures, for example by changing production and maintenance processes or procedures within the company, by using alternative materials, by economising, by recycling or by reusing materials.

### **2.3.7 Dealing with energy consumption/efficiency**

Energy consumption must be monitored and documented. Economical solutions shall be found to improve energy efficiency and minimise energy consumption. The supplier shall make reasonable efforts to continuously improve energy efficiency in operational processes with the help of suitable management systems.

## **2.4 Ethical business behaviour**

### **2.4.1 Prohibition of corruption, bribery, acceptance of advantages**

Corruption, i.e. bribery, corruptibility, granting and accepting advantages, has devastating effects worldwide. That is why we do not accept any form of corruption. This also applies to precursors of acts of corruption. The highest standards of integrity must be applied to all business activities. Procedures for monitoring and enforcing standards must be applied to ensure compliance with anti-corruption laws.

### **2.4.2 Fair competition**

BUHLMANN stands for expertise, innovative strength, customer-orientation and motivated, responsible employees, and we expect the same from our suppliers. We do not tolerate bribery, corruption or competition offences. We expect everyone in the supply chain to behave fairly in competition and to comply with all applicable antitrust and competition laws and neither to participate in agreements that violate antitrust law nor to abuse their dominant market position. Unlawful restrictions of competition include anti-competi-

tive behaviour and agreements with other suppliers or providers on prices, other charges, profit mark-ups, processing margins and other price components, payment, delivery and other conditions, payment of default compensation or compensation payments and profit sharing or other levies, unless the behaviour and agreements are permitted under competition law.

### **2.4.3 Money laundering**

BUHLMANN expects its suppliers to comply with all relevant legal obligations to prevent money laundering and not to participate in money laundering activities.

### **2.4.4 Export/import control**

The supplier shall comply with all applicable import and export control laws, regulations and sanctions of the country in which the supplier is located and all countries in which transactions are conducted, including import, export, re-export, transfer or disclosure. In particular, the supplier is obliged to comply with the import and export control laws, sanctions regulations and embargo regulations of the European Union, the United States, the United Kingdom and the United Nations.

### **2.4.5 Confidentiality and data protection**

The supplier is obliged to fulfil the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. The Supplier shall comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transferring and disclosing personal information.

### **2.4.6 Protection of know-how, patents, trade and business secrets**

All intellectual property rights must be respected by the supplier. The transfer of technologies and expertise must be implemented in such a way that the intellectual property rights of the respective owner are protected. The use of plagiarised or counterfeit materials is prohibited. The use, further processing or marketing of counterfeit products is not authorised by BUHLMANN.

### **2.4.7 Compliance with the Supplier Code of Conduct**

BUHLMANN expects the supplier to identify the relevant risks in relation to supply chains and to take appropriate measures. In the event of suspected violations within the supply chain and to safeguard supply chains with increased risks, the supplier shall provide prompt and, if necessary, regular information on the violations and risks identified and the measures taken. In order to determine the supplier's compliance with the principles and requirements of this

Supplier Code of Conduct, we reserve the right to check these ourselves, through third parties or by means of supplier self-assessments.

In addition, on-site audits can be carried out by BUHLMANN or a third party commissioned by BUHLMANN in consultation with the supplier.

#### **2.4.8 Complaints procedure**

expects the supplier to introduce an anonymous complaints system that is open to all employees to report violations of the standards anchored in this Supplier Code of Conduct.

If a supplier becomes aware of violations or deviations from the BUHLMANN Supplier Code of Conduct in its own company or within the supply chain, these must be reported to BUHLMANN immediately and remedial measures must be initiated. If a violation of the provisions of this Supplier Code of Conduct is detected, we will inform the supplier immediately in writing and set a reasonable grace period to bring its behaviour in line with these provisions. If a remedy is not possible in the foreseeable future, the supplier must notify us immediately and, together with us, draw up and implement a concept with a timetable for ending or minimising the breach.

We have the right to temporarily suspend the business relationship in the meantime. If the grace period expires without result or the implementation of the measures contained in the plan does not remedy the situation after the expiry of the timetable and no milder means are available, we may terminate the business relationship and cancel all contracts.

A statutory right to extraordinary termination without setting a grace period, in particular in the case of willful and very serious breaches, remains unaffected, as does the right to compensation.





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