



# SUPPLIER CODE OF CONDUCT

Personio SE & Co. KG and its affiliated companies (referred to as "Personio") consider it essential to uphold a shared set of guidelines, practices, and principles regarding ethics, social responsibility, and environmental protection with their partners. Accordingly, Personio is committed to fostering exemplary relationships with all partners, including suppliers, distributors, subcontractors, etc., based on responsibility, fairness, and integrity.

To achieve this, Personio mandates that its suppliers adhere to the ethical principles outlined in this Supplier Code of Conduct (referred to as the "Supplier Code") and ensure that their own suppliers and subcontractors do the same. While this Supplier Code does not cover every potential issue, it establishes fundamental principles and policies to align Personio's supplier relationships with Personio's values and Code of Conduct and Ethics.

In conducting its operations, the organization is dedicated to adhering to all relevant laws, regulations, national and international conventions, as well as best practices, particularly in the areas of ethics, social responsibility, and environmental protection. The organization anticipates its suppliers to mirror the same commitment to applicable laws and ethical principles as they apply in the management of their own enterprises. The organization mandates rigorous adherence to these standards by all its suppliers, their personnel, production facilities, subcontractors, and their respective suppliers.

In instances where national laws or other applicable regulations address the same matters covered in this Supplier Code of Conduct, the most stringent standards or restrictive provisions shall prevail. If any conflict arises between this Supplier Code of Conduct and applicable law, the latter shall take precedence. The organization collaborates with suppliers who consent to abide by the stipulations of this Supplier Code of Conduct and the principles outlined in the International Labour Organization Conventions, the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Women's Empowerment Principles.

Suppliers assume responsibility towards the organization for the work conducted by their subcontractors and suppliers, ensuring compliance by their subcontractors and suppliers with this Supplier Code of Conduct and relevant obligations.

In the event of any breach of this Supplier Code of Conduct by the supplier, its suppliers, or subcontractors, the organization reserves the right to assess the business relationship and

potentially terminate it in accordance with applicable law. This holds true even in the absence of a written contract formalizing the relationship, without prejudice to the organization's other rights or remedies.

- **LABOR STANDARDS AND SOCIAL RESPONSIBILITIES**

The organization mandates its suppliers to demonstrate exceptional social responsibility in their conduct, encompassing the following guidelines:

**Prohibition of Child Labor:**

- Work by children under the age of 16 is strictly forbidden.
- In regions where local laws set a higher age for child labor or require completion of compulsory education beyond 16, the highest age applies.
- No work that may endanger the physical, mental, or moral well-being of individuals under the age of 18 is allowed.

**Prohibition of Forced Labor:**

- Any form of forced labor, slavery, servitude, or human trafficking is strictly prohibited.
- Withholding identity papers or work permits, demanding a bond, or using any other form of coercion is strictly prohibited.
- Workers have the right to freely accept or leave their employment, and no repayment of debt through labor is allowed.

**Prohibition of Illegal Employment:**

- Suppliers must comply with all applicable regulations to prevent illegal, clandestine, and undeclared employment.

**Prohibition of Harassment and Abuse:**

- Suppliers are expected to treat their workers with respect and dignity.
- Any form of corporal punishment, physical, sexual, verbal, or psychological harassment, or other abuse is strictly prohibited.

**Prohibition of Discrimination:**

- Suppliers are required to treat all workers equally and fairly, without discrimination based on various factors.
- Discrimination related to wages, hiring, training access, promotion, maternity protection, dismissal, and other aspects is strictly prohibited.

**Wages and Benefits:**

- Suppliers must pay wages regularly and at least monthly, pay local minimum wages and, compensate for overtime if legally required.
- Compliance with legal requirements regarding worker benefits is mandatory.
- Deductions from wages are not permitted as a disciplinary measure.
- Suppliers must ensure that workers receive benefits as stipulated in applicable agreements.

**Working Hours:**

- Compliance with local laws and regulations regarding working hours is required.
- Excessive overtime is not allowed, and total weekly hours, including overtime, must not exceed legal limits.

- Workers are entitled to the minimum days off established by laws and must have at least one day off in every seven-day period.

**Freedom of Association:**

- Suppliers must respect workers' right to negotiate collectively and join labor organizations without any sanction, discrimination, or harassment.

**Ensuring Health and Safety:**

- Suppliers are expected to provide a safe and healthy workplace environment.
- Procedures and training to detect, avoid, and mitigate hazards must be implemented.
- Compliance with applicable local and international regulations and laws is required.
- The same principles apply to housing provided by suppliers.

● **ENVIRONMENTAL REGULATIONS AND PROTECTION**

The customer implements concrete measures to safeguard the environment through a specific program, collaborating with suppliers to uphold best practices across the supply chain. The customer expects suppliers to share this dedication and encourages initiatives to diminish the environmental impact, emphasizing the adoption of eco-friendly technologies.

Supplier compliance is mandated, requiring adherence to local and international environmental regulations, obtaining necessary permits, and demonstrating effective implementation of the following:

- Deployment of an environmental management system.
- Enhancement of environmental performance at sites and in production resources, focusing on proper waste management, elimination of air, water, and soil pollution, reduction of greenhouse gas emissions with a preference for renewable energies, reduction of water and energy consumption, and safe handling of hazardous chemicals.
- Implementation of measures to conserve biodiversity and ensure regulatory traceability and compliance for raw materials and substances.
- Adoption of best practices throughout the supply chain to uphold animal welfare.
- Contributions to continuous improvements in environmental performance throughout the lifecycle of the customer's products.
- Ensuring that personnel with direct environmental impact are adequately trained, skilled, and equipped with the necessary resources for effective job performance.

● **BUSINESS INTEGRITY REQUIREMENTS**

Personio insists on the highest standards of integrity from its suppliers in their business conduct. The following legal requirements must be adhered to:

**Compliance with Laws:**

- Suppliers are expected to fully comply with local, national, and international laws in the course of their business activities.

**Anti-Corruption:**

- Personio has a zero-tolerance policy for corruption and trading in influence. Suppliers are required to comply with all relevant laws regarding corruption, implement measures to prevent, detect, and penalize any such activities within their operations.

**Conflict of Interest Prevention:**

- Suppliers must adhere to all applicable laws related to conflicts of interest. Efforts should be made to prevent situations that could create a conflict of interest within the business relationship with Personio.

**Money-Laundering Prevention:**

- Suppliers are obligated to take appropriate measures to prevent their operations from being used for money-laundering activities.

**Competition Law Compliance:**

- Suppliers must commit to complying with competition laws in their host countries, which includes prohibiting the abuse of dominant positions and unlawful agreements between competitors.

**Confidentiality:**

- Suppliers must take all necessary measures to ensure the confidentiality of professional secrets and other non-public information received during the business relationship.

**Protection of Personal Information:**

- Suppliers are required to comply with all applicable laws and regulations regarding the protection of personal information.

**Customs and Security Compliance:**

- Suppliers must comply with applicable customs laws, including those pertaining to imports and the prohibition of transshipment of merchandise to the importing country.

**Trade Restrictions and Sanctions:**

- Suppliers must adhere to international trade restrictions and sanctions, staying informed about changes in these measures and complying with export control laws.

**Gifts and Invitations:**

- Gifts and invitations must align with local laws, be transparent, and not offered with expectations of reciprocity. Suppliers should be aware of and comply with anti corruption regulations and legal requirements.

**Protection of Assets:**

- Suppliers are required to protect Personio's resources and assets, including intellectual property rights, and actively combat counterfeiting through prevention, cooperation, and communication.

**Public Statements:**

- Suppliers are expected to be cautious with public statements, especially on the Internet and social media, ensuring they are not attributed to Personio and are consistent with commitments to confidentiality and professional secrecy.

**Information Transparency:**

- Suppliers must provide clear and accurate information about their methods, resources, production sites, and product or service characteristics, refraining from making misleading claims.

- **COMPLIANCE**

Suppliers should retain documentary evidence to support their compliance with this Supplier Code and should provide this to Personio upon request.