

# Supplier Code of Conduct

Code of Conduct for Suppliers and Business Partners of the auxalia WESTCAM Group

Version 2.0 – April 2026

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# 1. Introduction

The auxalia WESTCAM Group is a European provider of digital solutions in the fields of construction, product design, manufacturing and quality assurance. As a corporate group comprising auxalia, WESTCAM and ICN, it combines extensive expertise across the entire value chain and represents innovation, quality and sustainable development.

The business activities of the auxalia WESTCAM Group are based on integrity, responsibility and partnership. These principles form the foundation of all business activities as well as the relationships with suppliers and business partners.

With this Code of Conduct, the auxalia WESTCAM Group defines binding minimum requirements for responsible, lawful and sustainable behaviour within the supply chain. The requirements are based on internationally recognised standards, in particular the principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the core labour standards of the International Labour Organization.

**This Code was last reviewed and updated on: 15. April 2026.**

## 2. Purpose and Objectives

The purpose of this Supplier Code of Conduct is to ensure consistent social, environmental and ethical standards throughout the entire supply chain of the auxalia WESTCAM Group. The objective is to minimise risks, promote sustainable business relationships and ensure compliance with legal and internationally recognised requirements.

Suppliers and business partners undertake to comply with the requirements set out in this Code, to actively implement them and to integrate them into their business processes.

## 3. Scope

This Code of Conduct applies to all suppliers, service providers and other business partners of the auxalia WESTCAM Group. Suppliers are required to comply with the requirements set out herein and to pass them on appropriately to their own suppliers, subcontractors and other business partners. Each individual supplier and/or business partner (individually or collectively) is hereinafter referred to as the "Supplier".

The Supplier is responsible for ensuring that the requirements set out in this Code are complied with throughout its entire supply chain.

## 4. Social Responsibility

### 4.1 Human Rights

The Supplier undertakes to respect internationally recognised human rights without restriction. Any form of child labour, forced labour, modern slavery or human trafficking is strictly prohibited.

## **4.2 Equal Opportunity and Non-Discrimination**

The Supplier shall ensure a working environment that is free from discrimination. Any disadvantage based on ethnic or social origin, gender, religion, belief, age, disability, sexual orientation or any other legally protected characteristic is not permitted.

## **4.3 Fair Wages and Working Hours**

The Supplier shall ensure that wages paid to their employees complies at least with applicable legal requirements or corresponds to industry standards. Working hours shall be organised in accordance with applicable laws and recognised standards.

## **4.4 Whistleblowing System and Complaints Mechanisms**

The auxalia WESTCAM Group provides an effective and confidential whistleblowing system which enables the reporting of potential violations of legal provisions, internal policies or this Code.

Reports can be submitted via the official reporting channel:

**<https://auxalia.personiowhistleblowing.com/>**

The Supplier is required to inform their employees about existing reporting channels and to ensure access to such systems. Where the provided reporting channel is not used, the supplier shall establish appropriate and confidential complaints mechanisms at his own level.

All reports shall be treated confidentially. Persons who report in good faith or contribute to the clarification of facts shall be protected against any form of disadvantage or retaliation.

## **4.5 Protection of Whistleblowers and Non-Retaliation**

The auxalia WESTCAM Group and its suppliers shall ensure that individuals who report concerns in good faith or participate in investigations are fully protected.

Any form of disadvantage, intimidation, discrimination or other retaliation against whistleblowers is prohibited. This includes measures aimed at preventing, hindering or sanctioning reports.

## **4.6 Cooperation in Investigations**

The Supplier undertakes to cooperate fully in the clarification of potential violations. Investigations shall be supported by providing complete and accurate information.

## **4.7 Health, Occupational Safety and Working Conditions**

The Supplier shall ensure a safe and healthy working environment and comply with all applicable occupational health and safety regulations. Appropriate measures shall be implemented to prevent workplace accidents and health risks and shall be continuously improved.

## 5. Environmental Responsibility

### 5.1 Compliance with Environmental Regulations

The Supplier undertakes to comply with all applicable national and international environmental laws and regulations.

### 5.2 Energy and Resource Efficiency

Natural resources shall be used responsibly and efficiently. The Supplier is encouraged to reduce energy consumption, minimise emissions and implement measures for climate protection.

### 5.3 Resource and Waste Management

The use of raw materials and the generation of waste shall be minimised. Waste shall be handled properly, recycled or disposed of in an environmentally responsible manner.

## 6. Ethical Business Conduct

### 6.1 Avoidance of Conflicts of Interest

Business decisions shall be made solely on the basis of objective and factual criteria. Conflicts of interest shall be avoided or, where unavoidable, disclosed without delay.

### 6.2 Prohibition of Corruption

The Supplier undertakes to maintain a zero-tolerance policy towards corruption and bribery. It is prohibited to offer, grant or accept improper advantages, whether directly or indirectly.

This includes in particular cash payments, gifts, hospitality, commissions, kickbacks, inappropriate donations or any other benefits that may improperly influence business decisions.

### 6.3 Fair Competition

The Supplier shall comply with all applicable competition and antitrust laws. Anti-competitive practices, in particular price-fixing, market sharing, bid-rigging or the exchange of competitively sensitive information, are prohibited.

### 6.4 Intellectual Property

Intellectual property rights shall be respected and protected. Confidential information shall be safeguarded appropriately.

### 6.5 Integrity and Anti-Money Laundering

The Supplier shall comply with all applicable laws relating to the prevention of money laundering and terrorist financing and shall only engage in business with reputable partners.

## 7. Confidential Data and Business Secrets

The Supplier undertakes to protect confidential information and personal data in accordance with applicable legal requirements. Any unauthorised disclosure of business and trade secrets of the auxalia WESTCAM Group is prohibited.

## 8. Implementation, Monitoring and Audits

The Supplier undertakes to provide evidence of compliance with this Code of Conduct and to make relevant information available upon request. He shall cooperate in audits conducted by the auxalia WESTCAM Group or by third parties commissioned by it.

The auxalia WESTCAM Group reserves the right to review compliance with this Code appropriately.

## 9. Measures in Case of Violations

In the event of violations of this Code of Conduct, the Supplier is obliged to take appropriate corrective measures without delay. The auxalia WESTCAM Group reserves the right to take appropriate actions in the event of serious or repeated violations, including termination of the business relationship.

## 10. Acknowledgement and Acceptance

By signing this document, including by electronic signature (e-signature), the Supplier confirms that it has received, read and understood this Code of Conduct and agrees to comply with the requirements set out herein.

Acceptance of this Code of Conduct may also be effected through conduct. This applies in particular where the Supplier accepts a purchase order from the auxalia WESTCAM Group or initiates or continues a business relationship, provided that reference is made to this Code of Conduct in the relevant contractual documents or purchase orders.

Place, Date:

Company:

Contact Person:

Position:

Email:

Telephone:

Signature / Company Stamp: