

**Anyline.**  
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## Supplier Code of Conduct

<b>1</b>	<b>Introduction &amp; Scope</b>	<b>2</b>
<b>2</b>	<b>Business Ethics &amp; Integrity</b>	<b>2</b>
2.1	Compliance with Law & Records Management	2
2.2	Anti-Money Laundering	2
2.3	Anti-Corruption	2
2.4	Conflicts of Interest	2
2.5	Fair Competition & Anti-Trust	3
2.6	Counterfeit Parts	3
2.7	Whistleblowing	3
2.8	Trade Restrictions & Economic Sanctions	3
<b>3</b>	<b>Working Conditions &amp; Human Rights</b>	<b>4</b>
3.1	Child Labour	4
3.2	Modern Slavery	4
3.3	Indigenous Peoples	4
3.4	Freedom of Association & Collective Bargaining	4
3.5	Wages & Benefits	4
3.6	Recruiting Standards	5
3.7	Non-Discrimination & Anti-Harassment	5
3.8	Women's Rights	5
3.9	Health and Safety	5
3.10	Public and Private Security Forces	5
<b>4</b>	<b>Safeguarding Information</b>	<b>6</b>
4.1	Disclosure of Information	6
4.2	Data Protection & Data Security	6
4.3	Intellectual Property	6
<b>5</b>	<b>Environmental Protection</b>	<b>6</b>
5.1	Decarbonisation Efforts	6
5.2	Waste Reduction & Recycling	6
5.3	Water Quality, Consumption & Management	7
5.4	Soil & Air Quality	7
5.5	Noise Emissions	7
5.6	Land, Forest and Water Rights	7
5.7	Biodiversity, Land Use & Deforestation	7
5.8	Animal Rights	7
<b>6</b>	<b>Inquiries</b>	<b>7</b>

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## 1 Introduction & Scope

Anyline Group is committed to the highest standards of ethical conduct and requires the same of its business partners. Safe working conditions, treating employees with dignity and respect as well as acting in an ethically and environmentally responsible way are the cornerstones of entering into business together.

Anyline requires its suppliers, service providers, contractors, and sub-suppliers (each a “Supplier” and collectively “Suppliers”) to adhere to the supplier code of conduct (“Code”) as set forth in this document.

## 2 Business Ethics & Integrity

### 2.1 Compliance with Law & Records Management

Suppliers providing services or products to Anyline are required to operate in full compliance with all applicable laws and regulations. Suppliers shall be fully compliant with labour requirements, health and safety regulations and environmental regulations.

We expect Suppliers to maintain records to demonstrate compliance with applicable laws and regulations. This includes the accuracy, completeness and transparency of business and financial records.

### 2.2 Anti-Money Laundering

Suppliers shall not engage and/or assist to engage in money laundering activities. This is achieved by implementing relevant procedures, mechanisms, and internal controls within the organization. Suppliers shall undergo a due diligence and verification process that confirms non-involvement in any activities that can be considered a financial crime.

### 2.3 Anti-Corruption

Corruption and bribery have the potential to harm the reputation of Anyline Group and violate the trust that we have built with our business partners. Anyline does not condone any forms of corruption, including any direct or indirect act of bribery, extortion, or embezzlement.

Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates, including any applicable international anticorruption conventions.

### 2.4 Conflicts of Interest

In the event of a conflict of interest, whether real, potential or apparent, Suppliers shall refrain from entering into business with Anyline. In order to avoid even the appearance of a conflict of interest, both Suppliers and Anyline employees are expected to report any relationships that precede or extend outside potential business.

This may be economic, financial, political or professional or personal in nature, and it could relate to an advantage for the Supplier itself or in favour of people or organizations with previous or current business relationships.

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## 2.5 Fair Competition & Anti-Trust

Anyline believes in fair and open markets and expects its Suppliers to comply with local laws and also with generally accepted prohibitions on anti-competitive practices (e.g. price-fixing, market dividing).

Suppliers will not offer or accept privileges to/from their business partners, on which the business relationship is dependent. Suppliers must conduct their activities in accordance with free competition and in accordance with applicable anti-trust laws. Suppliers must avoid any agreement or action directly or indirectly restricting trade or free competition in an illegal manner.

## 2.6 Counterfeit Parts

Suppliers are responsible for ensuring that all parts and/or materials delivered within the supply chain adhere to relevant rules and regulations. Suppliers shall not knowingly deliver a suspect part and/or material or engage with independent distributors to prevent counterfeit cases. Especially in the technology industry, counterfeit parts are tricky to detect – Suppliers must therefore be extra vigilant to secure their supply chain.

## 2.7 Whistleblowing

Anyline Group will implement a whistleblowing infrastructure to enable employees as well as other stakeholders to report possible breaches of the code of conduct or violations of applicable law shortly.

## 2.8 Trade Restrictions & Economic Sanctions

Suppliers shall respect international trade restrictions and sanctions, taking into account any potential changes, as well as all laws and regulations concerning export controls.

As committed to its shareholders, Anyline is obligated to adhere to the following sets of rules and regulations, urging its Suppliers to commit to the same:

- Any economic, financial and trade restrictive measures and arms embargoes issued by the European Union pursuant to Chapter 2 of Title V of the Treaty on European Union as well as Article 215 of the Treaty on the Functioning of the European Union
- Any economic, financial and trade restrictive measures and arms embargoes issued by the United Nations Security Council pursuant to Article 41 of the UN Charter
- All anti-money laundering, fight against terrorist financing, tax evasion and tax fraud, insider trading and “know your customer” laws, regulations, directives or special measures applicable in Austria or Germany and in accordance with the standards set by the EU (including Directive EU 2018/843 of the European Parliament and of the Council of 30 May 2018 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (the “AML Directive”))

Furthermore, Anyline’s business activities do neither currently consist of or focus on and nor shall in the future consist of or focus on any activity mentioned in the Exclusion List and Sectoral Guidelines of KfW Group or any later version thereof as agreed upon between the Fund and KfW Capital from time to time.

Due to recent developments, Anyline Group is furthermore complying with current sanctions against Russia in relation to Ukraine and is expecting Suppliers to respect the same set of standards.

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## 3 Working Conditions & Human Rights

Anyline expects Suppliers to enable working conditions that meet international and national standards and to actively work to exceed those standards. Suppliers shall ensure that working hours are not excessive, respect designated rest days, allow for meal breaks, and do not exceed the maximum number of work hours or days allowed by applicable law.

### 3.1 Child Labour

As an organization, we want to do business in a legal and ethical manner adding value to society and the environment instead of doing harm. As such, helping stop child labour is fundamental to us and should not be condoned under any circumstances. We want to make sure that our organization does not take part in children's exploitation, while also helping to end it to the best of our ability.

Therefore, our Suppliers are also expected to comply with and respect fundamental and internationally recognized human rights. While we want to grow and thrive as a business, we are also committed to doing good by the community we belong to. Suppliers shall follow this Code, not only because we demand it as an organization, but because securing a bright future for children is everyone's duty.

### 3.2 Modern Slavery

Anyline Group has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

### 3.3 Indigenous Peoples

Suppliers shall respect the rights of indigenous and tribal peoples and their social, cultural, environmental, and economic interests, including their connection with lands and other natural resources. Under no circumstances shall indigenous or local peoples be forcibly removed from their land, respecting the principles of free, prior and informed consent.

### 3.4 Freedom of Association & Collective Bargaining

Suppliers must protect and support employees' rights to freedom of association, allowing them to form or join a trade union of their own choosing. Employee's representatives must not be discriminated against and must be allowed to carry out their representative functions.

In cases where the right to freedom of association and collective bargaining is restricted under law, the Supplier must facilitate the development of means for independent and free association and bargaining.

### 3.5 Wages & Benefits

Suppliers must fully comply with the regulations of the applicable collective bargaining agreement, informing their employees about their employment terms in writing and ideally exceeding minimum salaries defined. They shall also compensate overtime hours or offer compensatory time off. Pay structures shall be communicated company-wide, including transparency on payment periods.

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Moreover, Suppliers shall provide benefits that apply to all employees. Suppliers shall also provide their employees with access to training opportunities, supporting their talents and interests.

### 3.6 Recruiting Standards

Anyline Group expects their Suppliers to conduct business according to the highest ethical standards, which also includes non-discrimination in screening or hiring practices based on race, color, age, sex, gender, gender identity, gender expression, etc.

### 3.7 Non-Discrimination & Anti-Harassment

Suppliers are expected to provide a work environment free from discrimination and of equal opportunities. Suppliers shall not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability or other legally protected class.

The use of physical, verbal or sexual harassment or abuse, including any kind of intimidation of employees, shall be prohibited by suppliers.

### 3.8 Women's Rights

Suppliers shall respect the rights of women and seek to establish an environment in which they can access opportunities to participate in the workplace on an equal basis.

### 3.9 Health and Safety

Suppliers shall provide and maintain a safe and secure work environment, establishing procedures to prevent workplace hazards and accidents. No underage persons shall be required to engage in any work that involves a substantial risk of harm to the safety or health of the employees themselves or their co-workers.

Suppliers must ensure that working facilities have adequate and well-lit emergency exits and exit routes; evacuation maps shall be posted in appropriate locations, with respect to languages spoken in the workplace. What is more, suitable fire prevention, safety measures and training thereof must be provided. On top of these requirements, Suppliers shall also obtain and keep up to date any relevant health and safety permits.

### 3.10 Public and Private Security Forces

Suppliers shall not engage with private or public security forces with the goal to protect a business project. Making use of such aforementioned services may jeopardize the integrity of a project due to unforeseen circumstances and certain lack of control of external partners.

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## 4 Safeguarding Information

### 4.1 Disclosure of Information

Supplier shall accurately disclose information regarding its business activities, structure, financial situation, performance labor, health and safety, and environmental practices without falsification or misrepresentation to all appropriate parties and as required by law. Anyline Group does not condone or accept falsification of records or misrepresentations of conditions in the supply chain.

### 4.2 Data Protection & Data Security

Suppliers shall comply with all relevant data protection and privacy laws and regulations, therefore appropriately collect, store and process personal information. Suppliers shall conduct data processing within the framework of their contractual relationship with Anyline Group to guarantee the rights of the people concerned.

### 4.3 Intellectual Property

Anyline requests all Suppliers to thoroughly comply with intellectual property rules and to respect the intellectual property rights of third parties. Suppliers shall not use or pass on to third parties any intellectual property that belongs to Anyline without prior authorization and/or written permission. The Supplier and its employees are required to safeguard trade secrets.

## 5 Environmental Protection

Suppliers shall strive to avoid and minimise impacts on the environment and ecosystem. They shall use resources such as energy, water, land and raw materials in an efficient and sustainable manner. Suitable compensatory measures or restoration measures are to be undertaken if impacts cannot be fully avoided or mitigated.

### 5.1 Decarbonisation Efforts

To the best of their abilities, Suppliers shall establish sustainable and energy-efficient operations, adhering to good operating practices and ensuring the responsible use of natural – ideally renewable – resources.

In a joint effort to reduce the impact we have on our environment we expect our Suppliers to take every effort to reduce GHG emissions in their own supply chain and to strive for their individual emission-reduction targets or net-zero goals.

### 5.2 Waste Reduction & Recycling

Suppliers shall ensure to effectively reuse and recycle all (natural) resources, as well as reducing waste and by-products to the absolute minimum.

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## 5.3 Water Quality, Consumption & Management

Anyline requests its Suppliers to practice good water stewardship and asks them to establish practices ensuring the optimization of water usage onsite. Water consumption should be minimized and wastewater discharges treated responsibly, reusing and recycling where possible.

## 5.4 Soil & Air Quality

Suppliers must ensure access to preserved resources including clean drinking water, good soil quality for farming and the regeneratable air quality should be provided to local communities at all times.

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals or combustion by-products generated from operations are to be specified, monitored, controlled and treated as required prior to discharge.

## 5.5 Noise Emissions

Where applicable, Suppliers shall make any effort to avoid noise pollution, monitoring, controlling and largely reducing noise emissions caused by industrial machinery, construction and vehicles.

## 5.6 Land, Forest and Water Rights

Anyline demands of Suppliers to steer clear of any and all business practices that involve the forced eviction of peoples and communities and the subsequent acquisition of forests, lands and water supplies. This also includes the development and other unlawful practices associated with the reclamation of land.

## 5.7 Biodiversity, Land Use & Deforestation

In all areas of their business operations shall Suppliers protect ecosystems and ecologically diverse regions, respecting the internationally recognized biodiversity regulations as set out by the Biodiversity Information System for Europe<sup>1</sup> – a joint venture between the European Commission and the European Environment Agency. As such, illegal deforestation is to be avoided at all costs, aiming for the maintenance and protection of key areas for biodiversity.

## 5.8 Animal Rights

Anyline does not condone any form of violation of animal rights as declared by the World Organization for Animal Health<sup>2</sup>. Animals shall not be raised and killed for the sole purpose of furthering a Supplier's business success.

## Inquiries

All addressees are invited to comment on this Supplier Code of Conduct and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to **compliance@anyline.com**. Anyline Group is committed to respond as soon as possible.

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<sup>1</sup> <https://biodiversity.europa.eu/policy>

<sup>2</sup> <https://www.woah.org/en/what-we-do/standards/codes-and-manuals/>