

Supplier Code of Conduct

We expect you, as our supplier, to recognize, support, and implement the following standards together with us. These standards are based on the European Model Clauses (EMCs) for responsible and sustainable supply chains, the principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the Declaration of the International Labour Organization (ILO).

These standards are aligned with the Ten Principles of the United Nations Global Compact covering human rights, labour, environment and anti-corruption.

Environment

- We jointly commit to adhering to applicable national and international legal requirements, particularly in environmental protection.
- We take organizational measures in environmental management to minimize or prevent environmental risks and impacts.
- We implement efficient resource and environmental management systems to minimize waste and emissions.
- We reduce our negative impacts on biodiversity, climate change and water scarcity and seek to reduce environmental impact, including greenhouse gas emissions and climate-related effects.
- We take into consideration internationally recognized climate objectives in our activities.
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Social

- Together, we support the protection of internationally recognized human rights and commit to combating forced labor (including modern slavery and human trafficking) and child labor. Suppliers are expected to implement appropriate measures to identify, prevent and mitigate risks related to modern slavery in their operations and supply chains.
- We respect the freedom of association and the right to collective bargaining in line with applicable laws.
- We create a respectful work environment, free from harassment, abuse, discrimination, inequality, and inhumane treatment.
- We ensure that all employees are compensated in compliance with applicable local legal requirements.
- We promote an anonymous and secure complaint mechanism through Universal Investment's existing system: <https://universal-investment.meldung.clarius.legal/>. Any stakeholder may report concerns or violations here without fear of retaliation.

Governance

- We comply with all applicable national and international trade laws, including but not limited to antitrust and sanction regulations.
- We consider business integrity the foundation of our business relationships and prohibit any form of bribery, corruption, and money laundering.
- We respect the privacy and confidentiality of information related to our employees and business partners, protecting data and intellectual property from misuse.
- We implement a compliance management system that ensures and promotes adherence to relevant laws, regulations, and standards.

Shared Responsibility

We jointly take responsibility to ensure that our supply chain meets the above principles. These principles are also appropriately addressed with (indirect) suppliers along the supply chain, and they are encouraged to implement a due diligence process for human rights and environmental matters within their capacity. We conduct thorough checks before commissioning subcontractors and communicate with each other as necessary.

If required, we conduct self-assessments and audits to ensure compliance with the standards and work together on reporting when necessary.

Where appropriate, we may conduct reviews, assessments or other checks to support transparency and compliance.

If adverse impacts on human rights or the environment are identified, leading to prioritized/specific risks, we commit to developing and implementing a remediation plan to address the risks or their damages and prevent future incidents. Termination of the business relationship will only occur responsibly if no effective remedy can be achieved and in consideration of the potential impact on affected individuals.

If become aware of, or have reason to suspect, any breaches of Supplier Code of Conduct or applicable laws, please report your concerns via Universal Investment's complaint system: <https://universal-investment.meldung.clarius.legal/>

Together, we can shape a more sustainable future – we rely on your commitment!

Questions?

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