

SUSTAINABILITY POLICY
FOR SUPPLIERS

tratter®





FOREWORD

Sustainability plays a crucial role in the long-term strategic success not only of Tratter Engineering Srl but also of its suppliers. The new sustainability policy for suppliers of Tratter Engineering Srl actively promotes sustainable business practices while forming the basis for economic, environmental, and social responsibility. This document summarizes the fundamental principles and standards of Tratter Engineering Srl for its suppliers of production-related and non-production-related goods and services, adhering to globally recognized guidelines and principles.



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1 EMPLOYEE RELATIONS

Tratter Engineering Srl places great importance on its suppliers respecting fundamental workers' rights according to the applicable national legislation. Furthermore, we expect our suppliers to recognize the core labor standards of the International Labour Organization (ILO), taking into account local laws and legal forms in different countries and locations.

1.1 CHILD LABOR

We do not tolerate any form of child labor as per ILO conventions and prohibit the exploitation of children by our suppliers. Likewise, supporting child labor and the exploitation of children is strictly prohibited. The minimum age for employment must be at least 15 years, unless legal regulations establish a higher minimum age.

1.2 HUMAN RIGHTS

It is important to us that our suppliers respect and support internationally recognized human rights. We expect them not to participate in human rights violations.

1.3 FORCED LABOR AND HUMAN TRAFFICKING

Our suppliers must refrain from all forms of forced or compulsory labor as well as involuntary prison labor. Any involvement in human trafficking, the use of violence, or the use of involuntary or slave labor is strictly prohibited.

1.4 DISCRIMINATION AND EQUAL OPPORTUNITY

In our sustainability policy at Tratter Engineering, we emphasize the importance of diversity, equality, and inclusion. We expect our suppliers to actively promote these values. Discrimination in personnel decisions, advancement opportunities, or training offerings is unacceptable. Our partners must ensure that no one is disadvantaged or favored due to skin color, gender, disability, sexual orientation, age, religion, ethnic or social origin, nationality, physical condition, appearance, marital status, or political or union activity. We also value gender equality and the protection of the rights of indigenous populations and local communities in accordance with international standards.

1.5 HEALTH AND SAFETY AT WORK

Our suppliers must comply with the applicable national legislation on health and safety at work. Regardless of whether international standards allow for lower requirements, suppliers must ensure all workplace safety requirements.

1.6 REMUNERATION AND WORKING HOURS

Our suppliers must provide remuneration and social benefits in accordance with the basic principles of minimum wages, overtime, and legally prescribed social benefits. Working hours should be determined in accordance with industry laws and standards or relevant ILO conventions.

1.7 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We expect our suppliers to respect employees' rights in accordance with national legislation, allowing them to form worker representation and engage in collective bargaining.

1.8 WHISTLEBLOWING

The corporate ethics of our suppliers must include whistleblowing and protection against retaliation as per Article 19 of the World Bank Guidelines. Compliance violations must be thoroughly investigated.



2 BUSINESS CONDUCT

2.1 PRODUCT SAFETY

Our suppliers are obligated to ensure that their products and services do not pose a risk to human beings or the environment. Compliance with agreed-upon or legally mandated standards regarding product safety is of utmost importance. Suppliers are also urged to provide clear instructions for the safe use of their products.

2.2 CORRUPTION AND BRIBERY

Tratter Engineering Srl expects a clear commitment from its suppliers to a zero-tolerance policy towards corruption. Adherence to United Nations (UN) and Organization for Economic Co-operation and Development (OECD) conventions combating corruption, as well as all relevant anti-corruption laws, is mandatory. In particular, it is prohibited for employees, subcontractors, or representatives to offer, promise, or grant benefits to employees of Tratter Engineering Srl or closely related third parties in order to obtain business contracts or other preferential treatment.

2.3 FAIR COMPETITION

Tratter Engineering Srl does not tolerate actions, agreements, or arrangements that restrict competition in any manner. Our suppliers must neither participate in antitrust agreements with competitors nor exploit any potentially dominant market position. Furthermore, we require our suppliers to actively prevent the entry of counterfeit parts into the supply chain. If a counterfeit is discovered, all appropriate measures must be taken promptly to prevent damage, and Tratter Engineering Srl must be informed.

2.4 MONEY LAUNDERING

Our suppliers must comply with the relevant legal provisions for preventing money laundering and must not participate in any way in money laundering activities.

2.5 AVOIDANCE OF CONFLICTS OF INTEREST

Suppliers of Tratter Engineering Srl are expected to make decisions related to business activities with our company solely on an objective basis. Conflicts of interest, where secondary personal or institutional interests could jeopardize primary business interests, must be avoided.

2.6 PROTECTION OF INTELLECTUAL PROPERTY AND INFORMATION DISCLOSURE

The confidentiality of data, information, inventions, know-how, and intellectual property is of high priority for us and our suppliers. We assume that these sensitive pieces of information are carefully protected and used exclusively for business purposes. Our business relationships are based on concluded confidentiality agreements between the parties.

2.7 FINANCIAL RESPONSIBILITY

Tratter Engineering Srl places great importance on the prudent use of monetary resources within the company to significantly reduce financial risk for customers and suppliers. The documentation of financial information is carried out diligently, and the traceability of monetary flows is ensured to the best extent possible. Employees who, in the course of their work, come into contact with the company's bookkeeping or other financially and legally relevant documentation are obligated to exercise due diligence within the legal framework.

2.8 EXPORT CONTROLS AND ECONOMIC SANCTIONS

Our suppliers must adhere to all export controls and economic sanctions in accordance with international laws and regulations. We expect them to act responsibly and uphold the highest ethical standards.



3 ENVIRONMENTAL PROTECTION

3.1 RESOURCE MANAGEMENT AND SUSTAINABLE ECONOMIC BENEFIT

Tratter Engineering Srl places a strong emphasis on the responsible use of resources and strives for sustainable economic benefit in all business activities. Through the implementation of new technologies, consideration of material cycles, and targeted utilization of expertise, the consumption of raw materials is aimed to be minimized. Special attention is given to the efficient use of energy and water. Additionally, we continuously work on concepts to reduce water consumption and enhance water quality. Whenever possible, we prefer the use of renewable resources.

3.2 AVOIDANCE AND MITIGATION OF ENVIRONMENTAL IMPACT, WASTE REDUCTION, GREENHOUSE GAS, AND NOISE EMISSIONS, USE OF RECYCLING MATERIALS

Our goal at Tratter Engineering is to minimize all emissions according to current technological standards. We monitor and treat detrimental emissions before they enter the environment. Our efforts focus on waste reduction and recycling, including material reuse and exploring recycling possibilities. We also develop procedures for the safe transport, storage, and environmentally friendly disposal of waste. Air and noise emissions as well as greenhouse gas emissions are constantly monitored, and appropriate measures are taken. Our exhaust gas cleaning systems are continuously monitored and improved to minimize emissions.

3.3 SUSTAINABLE RESOURCE AND HABITAT MANAGEMENT: OUR RESPONSIBILITY IN ACTION

We place special emphasis on the sustainable use of water and the protection of land, forest, and water rights. Our suppliers are required to ensure that their activities do not impair water quality and efficiently utilize water resources. We encourage them to minimize water-intensive processes and drive creative solutions for responsible water use, without violating land, forest, and water rights. Evictions related to our supplier activities are strictly prohibited.

Animal welfare, biodiversity conservation, sustainable land use, and prevention of deforestation are cornerstones of our mission. Our suppliers are urged to align their activities with these principles and provide support.

Preserving soil quality holds a prominent place in our sustainability policy. We expect our suppliers to take specific measures to preserve and promote soil health – a crucial contribution to long-term sustainability.

3.4 AVOIDANCE OF HAZARDOUS SUBSTANCES

Tratter Engineering Srl avoids the use of substances that could pose a danger to human beings and the environment whenever possible. Additionally, we implement hazardous substance management to ensure the safe use and transportation, secure storage, recycling, reuse, and disposal of hazardous substances.

3.5 ENVIRONMENTALLY FRIENDLY PRODUCTS - ENHANCED FOCUS ON ENERGY EFFICIENCY AND USE OF RENEWABLE ENERGY

In the development of products and services, Tratter Engineering Srl places great importance on their efficient use of energy and natural resources. Our products are intended to be suitable for reuse, recycling, or safe disposal. Our environmental objectives have a heightened focus on energy efficiency and increased use of renewable energy sources. We aim to reduce the CO² footprint along the entire supply chain and explore the possible use of recycled materials.



4 CONFLICT-FREE ORIGIN OF MINERALS

Tratter Engineering Srl is aware of the potential link between the production of raw materials and armed conflicts or gross human rights violations. If minerals are sourced from conflict-affected regions or high-risk areas, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas must be followed.

Conflict minerals currently include columbite-tantalite (coltan), cassiterite, gold, wolframite, and their derivatives, limited to tantalum, tin, and tungsten. Deliveries to Tratter Engineering Srl must be considered „DRC conflict-free“ in accordance with SEC regulations.

5 MANAGEMENT SYSTEMS

Tratter Engineering Srl implements management systems that ensure compliance with the principles outlined here and certifies them according to recognized standards. We prefer suppliers who actively operate a quality management system in accordance

with ISO 9001, an energy management system according to ISO 50001, an environmental management system according to ISO 14001, and ISO 45001 for occupational health and safety, or equivalent systems.

6 PROTECTION OF IDENTITY AND PROTECTION FROM PERSECUTION, DATA PRIVACY

Tratter Engineering Srl expects its suppliers to protect employees who submit a complaint report within the supplier's organization from threats, harassment, or any other adverse actions. Additionally, the protection of personal data of the reporting and reported individuals must be ensured. Whistleblowers' identities are to be kept confidential during all stages of the process by the supplier company.

Confidentiality / Data Privacy:

The supplier commits to meet the reasonable expectations of its clients, suppliers, customers, consumers, and employees regarding the protection of private information. The supplier must comply with data protection and information security laws and regulatory requirements concerning the collection, storage, processing, transmission, and disclosure of personal information.



7 SUPPLIER RELATIONSHIPS

7.1 SUB-SUPPLIERS

Tratter Engineering Srl expects its suppliers to communicate all the principles and requirements described here to their sub-contractors, suppliers, and service providers and enforce their compliance. When selecting suppliers/service providers, the standards regarding human rights, working conditions, corruption prevention, and environmental protection should also be taken into account. Suppliers are encouraged to ensure that their sub-contractors and suppliers adhere to the described standards.

7.2 MONITORING AND ACCOUNTABILITY

Upon request, the supplier must provide Tratter Engineering Srl with all necessary information for an initial assessment, accurately and comprehensively, as part of a self-assessment. Furthermore, the supplier shall provide any other information that proves compliance with this policy. Tratter Engineering Srl will monitor the implementation of this policy. The supplier is required to inform Tratter Engineering Srl about any events that contradict the principles of this policy.

7.3 SUPPLIER'S DECLARATION

The supplier hereby confirms:

We have received the Sustainability Agreement of Tratter Engineering Srl and commit to comply with the principles and requirements of this Sustainability Agreement in addition to our obligations under the framework agreement with Tratter Engineering Srl. We agree that this declaration is governed by substantive law, excluding norms that refer to other legal jurisdictions.

_____ *Date* _____ *Company name* _____ *Signature*

_____ *Date* _____ *Company name* _____ *Signature*

IMPRINT

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Date: 28.07.2023

