



# **CODE OF CONDUCT for Suppliers**

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## Code of Conduct for Suppliers

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## Introduction and foreword by the management

PCH Technischer Handel GmbH pledges to conduct its corporate governance in an ecologically and socially responsible manner.

Being a company engaged in international business, PCH is committed to integrity and sustainability throughout its business activities.

Not only does PCH endeavour to achieve commercial success, but it also strives to comply with internationally recognised ethical standards and therefore takes into account the risks and opportunities associated with the social and environmental impacts that PCH may encounter in its own business and along its supply chain.

If you are a supplier, subcontractor or consultant („Supplier“) to PCH, then you are an important link in our supply chain and therefore the contribution you make to achie-

ving these high standards is fundamental. As such, the standards reflected in this Code of Conduct for Suppliers represent an important factor in the selection and evaluation of suppliers for PCH. When conducting any business with or for PCH, we expect our suppliers to comply with the legal and regulatory requirements applicable to their business activities as set out in this Code of Conduct for Suppliers.

The suppliers are hereby obliged to ensure compliance with this Code of Conduct for Suppliers along their entire supply chain.

PCH Technischer Handel GmbH

Dirk van Elten  
Managing Director

## Compliance with laws

This Code is founded on the values and rules outlined in PCH’s Code of Conduct and Ethics, the principles of international compliance and ethics standards as well as country-specific laws and guidelines.

Our suppliers have a duty to comply with all applicable laws and other legal provisions of the respective countries where they conduct business.

Insofar as any provisions of this Code of Conduct are in conflict with or amend the provisions of an existing contract between PCH and the supplier, in the absence of any agreement to the contrary, the provisions of the contract with the supplier shall take precedence.

PCH has been a member of the UN Global Compact since 20.02.2025.

# 1. Responsibility at the workplace

## Human rights

Our suppliers pledge to,

- › comply with internationally recognised human rights in accordance with the UN Charter of Human Rights when conducting its business activities.
- › strictly oppose all forms of forced and child labour as well as other forms of slavery and human trafficking, apply all applicable policies, laws and regulations in this respect and refrain from profiting from forced or child labour in their business activities and advocate the elimination of forced and child labour, and
- › adequately adhere to human rights due diligence obligations within the context of the German Supply Chain Due Diligence Act when conducting business with or for PCH.

## Equal opportunities and ban on discrimination

In accordance with applicable guidelines and laws, our suppliers ensure that,

- › all employees and applicants are afforded equal opportunities and no discrimination against employees is tolerated, such as on the basis of gender, ethnic origin, age, skin colour, marital status, physical or mental disability, religious affiliation or sexual orientation.
- › their employees are provided with a working environment that is free from physical, verbal and psychological violence, sexual harassment or other demeaning or abusive behaviour.

## Employee rights

Our suppliers respect and ensure,

- › compliance with all laws and regulations governing employment relationships with regard to the employment of its staff.
- › the free exercise of the rights conferred on workers to freedom of assembly, freedom of association, including through the formation of trade unions and workers' representation on a democratic basis under national rules and through membership of such an association, as well as the right of workers' representation to engage in collective bargaining, without workers and their representatives being subjected to intimidation, penalties or other detriment or disadvantage as a result of the exercise of their rights.

## **Wages and bonuses**

Our suppliers are obliged to,

- › pay employees at least the local statutory minimum wage, to pay overtime on top and to provide all legally prescribed additional benefits.
- › comply with laws restricting working hours.
- › neither utilise nor promote undeclared work and other illegal employment.

## **Occupational health and safety**

Our suppliers

- › must take measures to prevent health and safety risks in the workplace and ensure the best possible precautionary measures for avoiding accidents and occupational illnesses.
- › make the necessary and suitable personal protective equipment available to their employees.
- › provide their employees with the necessary safety information about risks in the workplace or hazardous substances and offer training measures in this respect.
- › adhere to all prevailing regulations and applicable standards pertaining to the health and safety of their employees in the workplace.

## 2. Conduct in business dealings

### Avoiding corruption

Our suppliers pledge to,

- › implement all necessary measures aimed at preventing corruption and bribery as part of their business activities in compliance with all anti-corruption laws and provisions of the countries in which they conduct business and all international guidelines (e.g. OECD guidelines).
- › not receive (passive corruption) or grant (active corruption) any improper benefits of any kind from members of public authorities and public officials or private business partners that could result in or give the impression of improper and inappropriate influence. This is also applicable to donations and sponsoring measures.
- › prohibit and refrain from facilitation payments of any kind, regardless of whether they contravene applicable local law in the respective country.
- › ensure, in giving or receiving gifts and hospitality, that they are of an appropriate scope, are legally permissible and do not contravene the rules of the recipient's organisation. Gifts and hospitality must not constitute any obligation for the recipient, must not exert any undue influence or create the appearance of such influence and must not be interpreted as bribery.
- › when initiating business transactions, not use any intermediaries or consultants for this purpose and, where necessary, take special care to avoid corruption when drafting and implementing contracts.

### Avoiding conflicts of interest

We expect our suppliers to

- › avoid any type of conflict of interest or situation giving the appearance of a potential conflict of interest.
- › in the event of an actual or potential conflict of interest, notify all affected parties without delay. This also includes a conflict between the interests of PCH and the interests of the supplier or their family members, relatives or acquaintances or their business partners.

### Fair competition

Our suppliers are obliged to,

- › act in accordance with national and, to the extent applicable, European laws and regulations aimed at fair competition.
- › refrain from any kind of illicit agreements or arrangements that unduly restrict competition (e.g. agreements on pricing, market allocation, limitation of production).

## **Preventing money laundering**

Our suppliers shall honour their legal obligations in relation to preventing money laundering and shall not be involved in money laundering activities.

## **Reporting**

Our suppliers

- › emphasise transparent, truthful and complete reporting and communication on the business transactions of their companies towards investors, employees, customers, business partners, the public in general and state institutions.
- › ensure that both internal as well as external reports, records and other documents of their companies as well as their storage are in compliance with the applicable legal rules and standards.

## **Trade embargoes, export control**

Our suppliers must ensure that,

- › their imports and exports conform to all applicable national and international laws and regulations pertaining to the import and export of parts, components, technical data and expertise.
- › they provide truthful and accurate information and obtain any necessary export licences or permits.

## **Plagiarism**

We expect our suppliers to adopt a strict policy against the purchase and use of plagiarised products.

## 3. Data and information security

### Data protection and IT security

Our suppliers pledge to,

- › gather, process and utilise all personal data in a lawful, transparent and secure manner in accordance with the applicable data protection regulations.
- › ensure that data protection breaches are avoided and to inform the contact person at PCH as quickly as possible should a data protection breach occur.
- › retain data in accordance with the retention periods.
- › protect confidential and proprietary information against unauthorised access, use, disclosure, amendment or destruction employing appropriate security procedures.
- › implement technical and organisational measures so as to ensure that the processing of personal data is in line with the latest technology.

### Business partner data and intellectual property

Our suppliers are obliged to,

- › treat confidential information of their business partners properly.
- › not use information from their customers and suppliers for purposes (e.g. advertising) other than what it was provided for, except where the owner of this information has given permission accordingly.
- › not copy, publish or disclose to unauthorised third parties any confidential information pertaining to PCH, except with the prior consent of PCH.
- › respect the intellectual property of others and comply with all laws designed to protect intellectual property, including patents, copyrights and trademarks.

## 4. Social responsibility

### Environmental protection

Our suppliers pledge to,

- › apply all applicable environmental laws and provisions,
- › especially follow the European Chemicals Regulation REACH („Registration, Evaluation, Authorisation and Restriction of Chemicals“) as well as the European Directive RoHS („Restriction of certain Hazardous Substances“) as amended in each case,
- › observe environmental due diligence obligations within the sense of the German Supply Chain Due Diligence Act in what is appropriate when doing business with or for PCH, and
- › ensure as a matter of principle, in particular when developing new products and services and when operating production facilities, that all resulting adverse effects on the environment and climate are minimised to the greatest extent possible. By this, PCH means the following in particular:
  - › reducing waste;
  - › economical use of natural raw materials;
  - › reducing greenhouse gas emissions;
  - › reducing the use of energy from fossil fuels;
  - › and achieving climate-neutral solutions.

**We expect all our suppliers to be certified in accordance with the ISO 14001 environmental management standard by 2026 at the latest.**

### Procuring mineral raw materials responsibly

Our suppliers are obliged to,

- › adhere to the laws and provisions applicable to minerals from conflict areas.
- › comply in particular with the European Regulation on Conflict Minerals (EU) 2017/821 (‘‘Establishing supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores and gold from conflict-affected and high-risk areas’’), applicable from January 1st, 2021.
- › do everything reasonable to avoid using raw materials originating from conflict-affected or high-risk areas if sourcing them would result in human rights violations, corruption, the financing of armed groups or similar adverse consequences.

## 5. Fundamentals of the ethics programme

### Implementation by our suppliers

Our suppliers are required to set up suitable management systems in accordance with the size and type of their company, designed not only to ensure compliance with laws and regulations, but also to uphold the rules of conduct outlined in this Code within the supplier's company and along its own supply chain.

With this in mind, PCH expects that its suppliers define their own rules of conduct in written form with the aim of creating a binding foundation for ethical and responsible behaviour on the part of their employees and business partners. The responsibility lies with the suppliers to inform and train their employees and business partners along their own supply chain on how to comply with these standards and to monitor compliance by suitable means.

### Whistleblower protection

Our suppliers

- › give their employees the opportunity to voice company-related or ethical concerns freely and regardless of their role.
- › ensure that the identity of whistleblowing employees and the concerns expressed in the course of any required investigations are treated in strict confidence consistent with applicable laws, in particular data protection laws.

### How to deal with breaches of the code

Should there be a breach of this Code of Conduct, whether committed by our suppliers, their bodies and employees themselves or by affiliated companies (and/or their bodies and employees) or other companies involved in fulfilling the contract, our suppliers undertake to report the breach without delay to their contact person at PCH or to the PCH whistleblower portal, accessible via the following link:

[To the whistleblower portal](#)

The supplier shall provide PCH with all information it requires to investigate the incident when the breach is reported, co-operate in the investigation and, where required, allow PCH or its advisors to conduct an on-site investigation at the supplier's premises.

Should there be a substantial breach of the provisions of this Code of Conduct by the supplier, the PCH reserves the right to review the business relationship and assert contractual rights.

## Our locations

### Potsdam Head Office

Wetzlarer Straße 14 | D-14482 Potsdam | Germany

**Tel** +49 (0)331 7093-311

**Mail** potsdam@pch-24.de

### Balingen Branch Office

Hölzlestraße 26 | D-72336 Balingen | Germany

**Tel** +49 (0)7433 27993-76

**Mail** balingen@pch-24.de

### Bautzen Branch Office

Baschützer Straße 17 | D-02625 Bautzen | Germany

**Tel** +49 (0)3591 5297-0

**Mail** bautzen@pch-24.de

### Dresden Branch Office

Nickerner Weg 5 | D-01257 Dresden | Germany

**Tel** +49 (0)351 48173-0

**Mail** dresden@pch-24.de

### Berlin Store

Ringbahnstraße 16 – 20 | D-12099 Berlin | Germany

**Tel** +49 (0)30 4036434-34

**Mail** berlin@pch-24.de

### Magdeburg Sales Office

Lorenzweg 42/5 | D-39124 Magdeburg | Germany

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### PCH BeNeLux B.V.

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Visit us at



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