

BORBET



CODE OF CONDUCT
SUPPLIER

November 2025

TABLE OF CONTENTS

	<p><u>INTRODUCTION</u> 03</p> <p>scope of applications</p>		<p><u>TRANSPARENT BUSINESS RELATIONS</u> 07</p> <p>Avoidance of conflicts of interest prohibition of corruption</p>
	<p><u>HUMAN AND LABOUR RIGHTS</u> 04</p> <p>prohibition of child labour and forced labour labour no discrimination freedom of association fair pay and benefits safety at work and working hours</p>		<p><u>FAIR MARKET BEHAVIOUR</u> 08</p> <p>fair competition money laundering prevention import and export control confidential information and data protection regular inspection</p>
	<p><u>ENVIRONMENTAL PROTECTION</u> 05</p> <p>creation and application of environmental management systems active handling of ecological challenges waste and recycling quality and safety animal welfare</p>	<p><u>REPORTING OPTIONS</u> 09</p> <p>for violations of the code of conduct</p>	<p><u>LEGAL CONSEQUENCES</u> 09</p> <p>of violations of the code of conduct</p>
		<p><u>APPROVAL</u> 10</p> <p>by the Supplier</p>	

Status November 2025



SCOPE OF APPLICATIONS

This “Code of Conduct” defines the principles and requirements that BORBET companies set for themselves and for their suppliers of goods as well as works and services with regard to their responsibility for people and the environment. BORBET reserves the right to change or adapt the contents and requirements of the “Code of Conduct” if necessary.

In this case, BORBET expects its suppliers and business partners to take such changes into account and confirm their acknowledgement.

Document see last page „[Supplier commitment](#)“



HUMAN AND LABOUR RIGHTS



Prohibition of child labour and forced labour

It is forbidden to recruit employees who are not at least 15 years of age. In countries that come under the exception for developing countries in the ILO Convention no. 138, the minimum age may be reduced to 14 years.

In accordance with the provisions of principle 4 of the United Nations Global Compact, it is prohibited to promote or tolerate any kind of modern slavery or forced labour.



No discrimination

Equal opportunities and equal treatment shall be guaranteed, irrespective of ethnic origin, skin colour, gender, religion, nationality, sexual orientation, social background, age or disability, insofar as this is based on democratic principles and tolerance towards other people. Employees are generally selected, recruited and promoted on the basis of their qualifications and skills. Suppliers' employees are also expected to respect the rights, national, cultural and ethnic characteristics of each individual with whom they come into contact during their business activities. At this point, the rights of women, minorities and indigenous peoples should be mentioned in particular. Diversity, equality and inclusion must be promoted in the company.



Gender equality

As a company, we are committed to ensuring gender equality. We therefore support and promote women's rights to achieve gender equality. We will not tolerate discrimination, harassment or violence based on prejudice or personal prejudices or personal attitudes against a specific gender will not be tolerated in any form.

We will ensure that women in our company have equal career opportunities, salaries and chances to realise their full potential.



Rights of minorities and indigenous peoples

The supplier respects the rights of local communities to decent living conditions, education, employment and social activities. Furthermore, minorities and indigenous people have the right to free, prior and informed consent (FPIC) regarding developments that affect them and the land on which they live.

Furthermore, no private or public security forces will be deployed to protect a business project if the prohibition of cruel and inhuman treatment is disregarded.



Freedom of association

The suppliers and business partners of BORBET recognise the fundamental right of all employees to form and join trade unions and employee representatives. Where this right is limited by local laws, alternative, legally compliant options for employee representation should be promoted.



Fair pay and benefits

Remuneration and benefits correspond to the legally valid and guaranteed minimum. If statutory or collective agreements are not in place, BORBET's suppliers and business partners shall align themselves with the sector-specific tariff remuneration and benefits customary for the location.



Safety at work and working hours

BORBET's suppliers and business partners comply with all applicable occupational health and safety regulations. They promote the continuous improvement of working conditions.

In the event of a fire, this must be reported immediately; if possible, initial rescue and extinguishing measures must be initiated. Every supplier must inform themselves about fire hazards, escape routes and fire extinguisher locations. When handling hazardous substances, the operating instructions and manufacturer's instructions must be observed; prescribed protective equipment must be worn. Working hours must at least comply with the statutory or industry-specific minimum standards. Harassment and disciplinary measures are prohibited.

ENVIRONMENTAL PROTECTION



Creation and application of environmental management systems

All BORBET suppliers and business partners continuously improve their environmental performance. Suppliers implement suitable environmental management systems for this purpose, for example in accordance with the international standard ISO 14001 or the EU EMAS Regulation. In the case of new suppliers, BORBET first obtains a self-assessment and creates a risk profile. If required certificates cannot be viewed, we also carry out production inspections or audits via third parties. With regards to the environment, our existing management system is subject to careful review.

This means suppliers may need to prove REACH registration. We also rely on the self-assessment tool for existing suppliers and request appropriate supporting documents that meet our sustainability requirements. Certificates, documentation, and sustainability reports are evaluated for this purpose.



Active handling of ecological challenges

When developing new products and services as well as operating production facilities, BORBET ensures that all the resulting effects on the environment and climate are minimized and that our products make as positive as possible a contribution to environmental and climate protection for our customers. We also demand the same from our suppliers. In order to improve the environmental performance indicators of products and services, the supplier should proactively manage the main environmental indicators, including the reduction of greenhouse gas emissions along the entire supply chain. The BORBET Group monitors the developments of its suppliers and requests information regarding total energy consumption in MWh and CO2 emissions in tons, Scope 1, 2 and 3 emissions (in accordance with GHG protocol and/or ISO 14064). Furthermore, the avoidance and reduction of environmental pollution must be promoted.

- Emission-reduced design of production processes
- Control and treatment of waste, exhaust air and liquids before release into the environment
- Reduction of energy and water consumption and noise emissions
- Optimization of air and water quality
- Protection of soil quality
- Promotion of biodiversity
- Compliance with land and water rights

We expect our suppliers to procure raw materials responsibly. Raw materials obtained illegally or through ethically reprehensible and unreasonable measures are not permitted. The use of conflict minerals affected by embargoes and other import restrictions must be excluded. Suppliers are therefore required to identify these raw materials in manufactured products in the supply chain and to disclose the origin and sources of the raw materials they use.

Animal welfare

Suppliers and business partners comply with nationally and internationally applicable legal standards on animal welfare and animal protection as well as recognized frameworks that define ethical principles in this regard.



ENVIRONMENTAL PROTECTION



Waste and recycling

The prevention of waste, reuse, recycling, the economical use of resources and the safe and environmentally friendly disposal of waste are taken into account in development, extraction of raw materials, production, use of products and other activities.



Quality and product safety

All products and services must meet the contractually defined criteria for quality and product safety upon delivery and must be able to be safely used for their intended purpose.



TRANSPARENT BUSINESS RELATIONS



Avoidance of conflicts of interest

BORBET's suppliers and business partners make their decisions solely on the basis of objective criteria and will not be influenced by personal and financial interests or relationships.



Prohibition of corruption

BORBET's suppliers and business partners do not tolerate corrupt practices and take action against them. BORBET requires its suppliers and business partners to reject and prevent any form of corruption. This also includes so-called „facilitation payments“ (illegal payments to speed up routine administrative matters). Suppliers shall ensure that their employees, subcontractors or agents do not give or offer bribes, kickbacks, improper donations or other improper payments or benefits to customers, public officials or other third parties. Neither shall they accept such payments or benefits from them.



FAIR MARKET BEHAVIOUR



Fair competition

In all countries, relationships and arrangements with competitors, suppliers, distributors and dealers that affect fair competition are prohibited by law. This includes, for example, price agreements, the division of customers or sales territories between competitors, anti-competitive boycotts and other unfair methods of competition. BORBET and its suppliers are committed to fair competition and to compliance with these laws and regulations.



Confidential information and data protection

All information that has not been made publicly available is subject to confidentiality and may not be disclosed to unauthorised third parties either during or after termination of the business relationship.

Personal data can only be processed in accordance with the applicable statutory provisions on data protection. The intellectual property of third parties, as well as product safety, must be protected. The privacy of each individual must be respected.



Money laundering prevention

BORBET's suppliers maintain business relationships exclusively with reputable business partners whose business activities are in accordance with statutory provisions and whose financial resources are of legitimate origin.



Regular inspection

We reserve the right to inspect our suppliers by means of inquiries, internal audits or other procedures.



Import and export control

BORBET's suppliers and business partners shall ensure compliance with all applicable laws for the import and export of goods, services and information.



REPORTING OPTIONS FOR VIOLATIONS OF THE CODE OF CONDUCT

In order to protect BORBET, its employees, suppliers and business partners, misconduct must be detected at an early stage, reviewed and remedied immediately. This requires the awareness of everyone and their willingness to point out possible violations of the rules when there are concrete indications. In the event of concrete indications of misconduct on the part of our employees in Europe or the employees of our suppliers, please report this to the mailbox Compliance@borbet.de, via the homepage under: „Code of Conduct & Compliance“ or by phone: **+49 2984 301 2288** or **+4915140090787**. Reported information is processed confidentially by the responsible parties in a transparent and fair procedure. Whistleblowers must be protected from retaliation by law. Information regarding our location in South Africa can be made via the following KPMG hotline: **0800 777117**

KPMG is tasked with receiving and processing the information. The supplier must also establish a whistleblower procedure in its company. Whistleblowers must be protected from retaliation.



LEGAL CONSEQUENCES OF VIOLATIONS OF THE CODE OF CONDUCT

If a supplier or business partner of BORBET does not comply with the basic principles set out in this document, BORBET is entitled to end the business relationship with this supplier by termination for cause. It is at BORBET's discretion to refrain from such consequences and instead to take alternative measures if the supplier or business partner can provide credible assurances and can demonstrate that he has taken immediate action to prevent future violations.

SUPPLIER COMMITMENT

As one of the leading manufacturers of light alloy wheels, BORBET is aware of its corporate responsibility towards customers, employees, suppliers and the public. Not only our own production is to be made more sustainable, but also the entire value chain. As an internationally active company, it is part of our responsibility to comply with applicable laws at all times and everywhere and to respect ethical values. We expect the same from our suppliers and business partners.

This Code of Conduct is intended to serve our suppliers and business partners as a guideline for compliance with international standards, environmental rights, human rights and business ethics. These values are regarded as fundamental at BORBET, in order to establish long-lasting and mutually satisfying business relationships.

For this reason we ask all our suppliers and business partners to sign this Code of Conduct by a legal representative.

By signing, the supplier confirms that he has read the Code of Conduct and accepts all of the terms and conditions. In addition, BORBET expects its suppliers to have introduced their own internal guidelines and procedures with the same or similar topics of the BORBET Code of Conduct. If this is not the case, the supplier confirms with his signature that he adheres to the BORBET Code of Conduct and passes on the conditions mentioned there to his employees and suppliers.

If one or more points, currently or in the future, cannot be fulfilled by the supplier, this must be communicated immediately in writing.

Supplier Commitment	
Company name	
Address	
Signatory's name	
Signatory's function	
Already adopted internal guidelines and procedures? (Company's Code of Conduct)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Date	
Company Stamp & Signature	

Please return the signed form to the following address within two weeks after its receipt:

E-Mail: csr@borbet.de

By post: Sustainability, BORBET GmbH, Hauptstraße 5, 59969 Hallenberg