



GIM | RELEVANCE COUNTS.

GIM Code of Conduct for Suppliers

Dear suppliers,

GIM mbH is committed to compliance with applicable law, social and ethical standards as well as responsible and sustainable practices. This is part of our corporate identity and is based on the ethical values of integrity, respect and fairness.

We take responsibility for a value chain that is based on compliance with international laws and standards and meets the highest possible ethical values.

Therefore, in this Supplier Code of Conduct, we have outlined our standards on compliance with regard to applicable law, human rights and non-discrimination, labour, ethics, health, safety and the environment.

GIM strives to maintain close, trusting and sustainable relationships with its suppliers based on the highest possible business standards. Therefore, we consider the principles outlined in this Code of Conduct as basic conditions for a business relationship with GIM.

These behavioural guidelines form a cornerstone of our GIM compliance programme. We believe that they contribute to strengthening the trustful cooperation with our partners, i.e. both customers and suppliers.

With kind regards,

Dr. Stephan Telschow
Managing Director

Lutz Goldschmidt
Sr. Legal Counsel/Compliance Officer

Human rights, labour and social standards

We expect our suppliers to treat all fellow human beings with respect and to uphold human rights. They should strive to make a positive contribution to the respect of human rights and the well-being of people. Suppliers shall undertake to comply with internationally recognised labour and social standards. The suppliers' commitment shall include labour standards as set out in the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labour Organization (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration). In their business activities, suppliers shall always be careful not to cause or indirectly contribute to human rights violations.

Special consideration shall be given to the suppliers' handling of the following aspects in the area of human rights, labour and social standards:

- **Prevention of child labour and protection of young workers:** Child labour shall not be used at any stage of a project. Suppliers shall strictly follow the recommendations of the ILO conventions on the minimum age for the employment of children, even when using subcontractors, according to which the minimum age should not be less than the age at which compulsory schooling ends and in any case not less than 15 years.
- **Fair wages and benefits:** The remuneration paid to workers shall comply with all applicable laws on remuneration, including, for example, laws on minimum wage or overtime. If the legal minimum wage is not sufficient to cover the cost of living, suppliers shall undertake to pay a wage that covers basic needs. Wage deductions as a punitive measure shall not be permitted. The basis on which workers are paid shall be made known to them on an ongoing basis by means of a pay slip.
- **Fair working hours:** Working hours must comply with applicable laws and industry standards. Overtime is only permitted if it is worked on a voluntary basis and does not exceed 12 hours per week, while workers must be given at least one day off after six consecutive working days. Weekly working hours shall not regularly exceed 48 hours.
- **Combating modern slavery:** Suppliers shall obviously not use forced labour, slave labour or any such comparable work. All work shall be voluntary and employees shall be able to leave work or employment at any time. Furthermore, any unacceptable treatment of workers, such as causing psychological stress or sexual and personal harassment shall not be permitted.
- **Promotion of freedom of association and collective bargaining:** Suppliers shall respect the right of workers to freedom of association, to join trade unions, to appeal to labour representatives or to join works councils in accordance with local laws. Workers must be provided the opportunity to communicate openly with management without fear of reprisal or harassment.

Respectful treatment at the workplace/prohibition of discrimination

All of the suppliers' employees should always feel valued and respected. Therefore, suppliers shall not tolerate condescending, demeaning, insulting or otherwise disrespectful words and actions towards co-workers. Suppliers shall promote an inclusive working environment that allows room for diversity and where people from different backgrounds, views and perspectives, as well as from different regions, come together on an equal footing. Suppliers shall not tolerate discrimination on the basis of age, ethnic background, colour, gender, sexual orientation, identity or expression, national origin, religion, disability, genetic information or personal characteristics and preferences. These principles shall guide all decisions regarding employees from recruitment and hiring to promotions, benefits, disciplinary actions, and terminations.

Environmental protection, health and safety

Suppliers shall be committed to energy efficiency and climate protection and shall work continuously to develop sustainable solutions. In all business activities and in close cooperation with their own suppliers, our suppliers shall maintain high health and safety standards, thereby preserving the trust of their employees, customers, business partners and other stakeholders.

Digital responsibility

Suppliers shall conscientiously and efficiently integrate digital technologies into their business activities. Suppliers shall use the advantages of technologies for the development of business strategies, services and customer solutions. Suppliers shall be aware of the impact of digitalisation on their employees, customers, test persons and society. Therefore, suppliers shall be committed to managing this change responsibly and ethically for the benefit of all stakeholders, including by ensuring that any technologies developed and their use are in accordance with this Code of Conduct.

Data protection/confidentiality

Data protection and confidentiality should be of paramount importance to our suppliers. Suppliers shall undertake to meet the reasonable expectations of their clients, suppliers, test persons and employees with regard to the protection of private information. Suppliers shall observe all relevant laws on data protection and information security as well as official regulations when collecting, storing, processing, transmitting and forwarding personal data.

Fair competition/antitrust legislation

Through their business activities, our suppliers shall promote free and fair competition. In doing so, they shall always comply with all applicable laws and regulations. Suppliers should be convinced that fair and regulated competition strengthens market dynamics and brings advantages for their customers. Suppliers should be aware that violations of antitrust legislation may result in heavy fines or even imprisonment for their companies, their executives and other individuals involved. We all need to keep an eye out for situations that might potentially jeopardise free and fair competition.

Gifts and invitations

Suppliers shall not consider it appropriate to give or accept gifts in the course of their business activities. However, in the context of a successful business relationship, it may happen that suppliers are offered a small gift or invitation as a polite gesture. In such situations, it is important to proceed with caution and common sense so that motivations are not misunderstood and reputational damage is avoided. Suppliers shall grant or accept gifts only if they are of moderate value and are a gesture of courtesy in accordance with general business practice. Suppliers shall consistently reject gifts that are intended to improperly influence a decision or an official act. In doing so, they shall always keep in mind the impression which may arise due to the external circumstances and the overall situation. The same standards shall apply to the suppliers both in terms of giving and of accepting gifts. Suppliers shall not give or accept cash or other means of payment such as gift cards and shopping vouchers. Suppliers shall exercise particular caution when dealing with public officials.

Conflicts of interest

Suppliers should be aware that personal relationships and interests should not affect or influence business activities and decisions. They shall therefore take care to avoid situations in which private and professional interests might collide or which give the impression that this is the case. A conflict of interest per se is not yet a form of misconduct - but the way the respective situation is handled might be. Transparency is crucial here: potential conflicts of interest must be reported immediately to the supervisor or Compliance Officer. Suppliers shall not be guided in their business decisions by the desire to help friends and family members. Suppliers shall always make decisions based on criteria such as competence, performance and conduct at work. Similarly, the suppliers' business activities with third parties shall be based on objective criteria such as price, quality, reliability and (where relevant) compliance with market and opinion research standards.

Intellectual property

Our suppliers shall respect intellectual property rights. Technology and know-how transfer shall be carried out in such a way that intellectual property rights and customer information are always protected.

Export controls and economic sanctions

Suppliers should be aware that all their national and international business relationships may be subject to trade control laws. They shall seek to prevent their products or services from falling into the wrong hands and possibly being misused. For this reason, suppliers shall comply with all legal requirements, including trade control regulations such as embargoes and anti-terrorism laws, which are designed to prevent misuse.

Complaint mechanisms

Suppliers shall have established an effective grievance mechanism at company level for all employees, customers, suppliers and participants in market research studies.

Heidelberg, February 2023