

Thinkproject Group Supplier Code of Conduct

This Supplier Code of Conduct summarizes the minimum ESG-standards that suppliers must meet to do business with Thinkproject Group. In this context, "supplier" refers to any natural person or legal entity that provides products or services to Thinkproject Group. Each supplier is expected to adhere to the principles outlined in this document.

Environmental

- **Environmental Regulation:** The supplier complies with all applicable environmental regulations.
- **Environmental Protection:** The supplier continuously strives to minimize the negative impact of its business activities on the environment.

Social

- **Non-Discrimination and Fair Treatment:** The supplier does not allow discrimination on the basis of ethnicity, sex, skin color, religion, political opinion, disability, sexual orientation, race, age, nationality and social background. The supplier fights any form of such discrimination and promotes a workplace characterized by equal opportunity, diversity and respect. This includes compliance with all applicable laws regarding disciplinary action and refraining from the use or threat of any form of corporal punishment, abuse or harassment.
- **Freedom of Association and Right to Collective Bargaining:** The supplier respects employees' right to associate freely and bargain collectively in accordance with applicable laws.
- **Prohibition of Child Labor:** The supplier employs no individuals below the age of 18 if it is not in compliance with applicable local law as well as standards 138 and 182 of the International Labor Organization (ILO). Consistent with ILO conventions, the supplier employs no individuals below the age of 18 for any sort of hazardous work.
- **Prohibition of Forced Labor:** The supplier does not use any form of forced or compulsory labor. This includes modern slavery and human trafficking.
- **Health & Safety:** The supplier meets or exceeds applicable occupational health and safety laws to provide a safe and healthy work environment for its employees. Further, employees receive appropriate training on occupational health and safety measures and issues. The supplier also acts in accordance with applicable laws regarding acceptable living conditions.
- **Fair Wages and Working Hours:** The supplier complies with all applicable laws regarding maximum working hours and minimum living wages. The total weekly working hours cannot regularly exceed 48 hours. Suppliers are expected to provide

their employees with fair compensation and ensure acceptable living and working conditions for them. This includes ensuring, at a minimum, reasonable access to potable water and sanitary facilities, fire safety, and adequate lighting and ventilation.

Governance

- **Data Security and Protection:** The supplier acts in compliance with the applicable laws and international standards related to data protection. This includes respecting the privacy and confidential information of each individual and processing personal data responsibly and confidentially. The supplier ensures that personal data is protected from misuse.
- **Fair Competition, Antitrust Laws and Export Controls:** The supplier complies with all applicable laws and regulations regarding competition, antitrust, export controls and customs. The supplier does not engage in any actions resulting in undue influence, unfair competition or harming the intellectual property rights of others.
- **Anti-Corruption and Conflicts of Interest:** The supplier bans all types of corruption and bribery from its business practices and acts in accordance with applicable anti bribery and anti-corruption laws and regulations. The supplier prohibits gifts to public officials as well as to decision-makers in the private sector that are intended to influence business decisions. The supplier further avoids all conflicts of interest that may influence business relationships.

Each supplier is expected to report any violation of the standards set out in the Thinkproject Group Supplier Code of Conduct. Employees of suppliers have the option to submit an anonymous report through Thinkproject Group's whistleblower system at <https://thinkproject.integrityline.com/>. Details of the reporting procedures and processes can be found in the relevant Whistleblowing Policy, which can be accessed via the same link.

All reports, including references to the whistleblower, will be processed confidentially and in accordance with applicable laws.

DOCUMENT CONTROL

Version	Date	Author	Approved by	Details of changes made
1.0	29.07.2022	Marc Kiesser	Anne-Aurélie Duval Patrik Heider	First version
1.1	21.12.2022	Marc Kiesser	Anne-Aurélie Duval Renzo Taal	Change of approval responsibility
1.2	16.01.2023	Marc Kiesser	Anne-Aurélie Duval Renzo Taal	Extension of requirements with respect to minimum living wages, maximum working hours and acceptable living conditions
1.3	24.11.2023	Andrea Collado Betrán	Andreas Blücher	Document review