



# Supplier Code of Conduct 2024

Helaba-Group  
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# 1 General Section

## 1.1 Societal Responsibility

The supplier commits himself to living up to his societal responsibility and complying with legal requirements in all his business activities.

## 1.2 Company-Wide Commitment

The supplier takes care and guarantees that companies affiliated to his business (§§ 15 ff. AktG) also abide by the following regulations.

## 1.3 Application to Sub-Contractors

The supplier is obliged to make this declaration available to all companies who, as sub-contractors, render services within the framework of their business relations, and he shall be obliged to ensure compliance with the regulations set forth herein.

## 1.4 Proactive Action

The supplier has the obligation to contribute to ecologically sustainable development. He will, therefore, consistently strive to enhance overall environmental protection and ensure the health and safety of everyone who is directly or indirectly affected by his activities.

## 1.5 Responsibility in the Supply Chain

Helaba expects from its suppliers to protect human rights and the environment in accordance with the protected legal positions under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG). The supplier addresses the protection in an appropriate manner along the supply chain. The supplier allows the implementation of preventive measures to enforce the previous expectations. Preventive measures include trainings, qualifications, on-site audits and/or other adequate monitoring. The enforcement is carried out annually and occasionally at the expenses of Helaba and by its own employees or third parties. The supplier shall provide appropriate access to the relevant areas and/or documents. The preventive measures take place during business hours and without interfering the supplier's business processes. Furthermore we refer to our declaration of principles/ policy statement. It is available on our website:

[Helaba - Our holistic view of the supply chain for the protection of human rights](#)

# 2 Economy/Fair and Partnership-Driven Relationships

## 2.1 Corruption

The supplier strongly rejects any form of illegitimate influence within the framework of his business activities. Hence, no gifts, payments, invitations, or services must be offered, promised, granted, or accepted in business transactions if these happen with the intention to influence the transactions, and are therefore capable of endangering the respective business partner's independence. By the same token, the supplier's and Helaba's interests as well as the private interests of the employees of either party shall be strictly separated from one another. All actions and decisions shall always be taken free of any irrelevant considerations and personal interests whatsoever. Current anti-corruption regulations must strictly be complied with.

## 2.2 Conduct vis-a-vis Competitors

The supplier appreciates fair competition. He consequently conforms to any legislation designed to protect and further competition.

### **2.3 Communication**

Helaba has made it its principle to be open and ready to communicate at all times. In this connection, Helaba will be pleased to provide technical and comprehensive information on its products, services, and development.

Helaba expects the same approach from its suppliers.

## **3 Social and Ethical Responsibility**

### **3.1 Human Rights**

The supplier commits himself to observing international human rights.

### **3.2 Discrimination**

The supplier commits himself to confronting discrimination of any kind within the framework of the respective contract relationship. This shall apply to the discrimination of people due to their gender, age, race, religion, or worldview, their ethnic or cultural origins, disability, sexual orientation, membership in trade unions, or political parties.

### **3.3 Forced Labour**

The supplier strongly rejects any form of forced labour.

### **3.4 Health Care**

The supplier ensures work safety and health care in the workplace within the framework of national regulations valid in the respective place of service provision.

### **3.5 Minimum Wage**

The supplier commits himself to complying with the requirements of the Minimum Wage Act (MiLoG).

### **3.6 Right of Assembly**

The supplier observes his employees' right to freedom of coalition within the framework of existing rights and laws.

### **3.7 Operation of Security Personnel**

The supplier undertakes, when engaging or using private or public security forces for the protection of the Company's project, to ensure that appropriate instruction or control on the part of the Company ensures compliance with the above points.

### **3.8 Child Labour**

The supplier complies with the UN regulations on human rights and the rights of children. In particular, the supplier commits himself to conforming to the convention on the minimum age for the permission of employment (convention 138 of the International Labour Organization) as well as the convention on the ban on child labour and measures to eliminate the worst forms of child labour (convention 182 of the International Labour Organisation). In cases where a national government sets higher standards, these will have to be observed primarily.

## 4 Ecology

### 4.1 Compliance with Statutory Norms

The supplier observes environmental protection with regard to pertinent national statutory norms and international standards.

### 4.2 Renewable Energies

Helaba embraces the utilisation of renewable energies in throughout its value creation processes.

### 4.3 Contents of Products and Declaration of Pollutants

All products and packaging materials delivered by the supplier must conform to the guidelines for the assessment, approval, and limitation of chemicals (REACH regulation of June 2007; incorporated into national legislation according to Reach Adjustment Act of 1 June 2008) irrespective of whether or not a substance in question is featured as restricted or prohibited on the list of environment-related substances.

Any laws or regulations applicable to the types and utilisation of substances, or the threshold values for the respective substances must be complied with.

### 4.4 Packaging Materials

All packaging materials used by the supplier for the purpose of product protection, storage, or the transport of goods must either be recyclable or belong in one of the pertinent exchange systems. The supplier is obliged to provide proof of any pertinent certification.

### 4.5 Logistics

With regard to the transport of goods, great care has to be taken that only such means of transport are chosen which ensure that environmental pollution is kept as minimal as possible. In this respect, transport by ship is to be preferred to air freight in international contexts, and rail transport shall be favoured over the transport of goods by lorry in the area of continental transport.

### 4.6 Environmental Seal

Helaba prefers the collaboration with such suppliers who have verifiably been certified on the basis of industry- standard test seals (EMAS, ISO 14001 etc.), or who have been audited for a commonly recognised environmental seal.

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