

HOYER

Supplier Code of Conduct

Conscious of responsibility –
Committed to tradition

hoyer.de

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A word from the family

The success of VISKA B.V. & Co. KG (together with affiliated companies within the meaning of Section 15 et seq. AktG, hereinafter referred to as "Hoyer") is dependent on the trust of customers, the wider public and the company's reputation. Sustainability in the broader sense, legal compliance and integrity are therefore a particularly important part of Hoyer's corporate strategy and essentially reflect the family's values. The continuous improvement of working conditions and the protection of human rights and the environment are particularly important to us.

The name of the Hoyer family is representative of the company and its actions. As the owner family, we live up to our values and the values of our company every day. It is also a priority for us that our employees and our national and international direct suppliers as contractual partners (hereinafter referred to as "suppliers") follow this example, in line with our motto: **conscious of responsibility, committed to tradition.**

Together with you, we want to actively take responsibility for our environment, our regions, the employees in our supply chain and our society. For years, our successful collaboration with our suppliers has been based on respect and trust, mutual appreciation and openness. We source raw materials, goods and services worldwide to manufacture our products and expect the highest levels of integrity and sustainability from all our suppliers. These expectations apply both to our suppliers' own business activities and to the deeper supply chain. We attach great importance to ensuring that our business partners

also share and promote the more far-reaching values defined here at all times. Hoyer is prepared to ensure this through joint efforts and long-term cooperation in the supply chain.

In order to help ourselves and our suppliers to live this corporate strategy and our values every day, this Code of Conduct sets out our specific expectations towards suppliers. It is intended to further raise common awareness and help people make the right decisions and comply with applicable laws and guidelines. We also take the fulfilment of expectations into account in our procurement processes.

The German Supply Chain Due Diligence Act ("LkSG") sets out human rights and environmental due diligence obligations that affect both our own business area and our supply chain and characterises the content formulated below.

New challenges and framework conditions may require continuous adaptations or additions to this Code. It is particularly important for us to react appropriately to changes in the legal situation or significant changes in our risk analysis. Under these conditions, the Supplier Code of Conduct can also be adapted unilaterally by Hoyer in the course of the cooperation. We will inform our suppliers of any changes in good time.

We would like to thank our suppliers for their support in complying with these values and guidelines and look forward to deepening our cooperation on this basis.

The Hoyer family



The Hoyer family
(from left:
Markus Hoyer,
Stefan Hoyer,
Heinz-Wilhelm Hoyer,
Ulrike Hoyer and
Thomas Hoyer)

Compliance with applicable laws and guidelines

»Our daily actions are consistently and without exception in conformity with the applicable laws, including compliance with sanctions, trade restrictions and supply chain due diligence obligations. We do not tolerate bribery, corruptibility or corruption or attempts to do so in our company under any circumstances and have processes and control mechanisms in place to prevent them.«

Prerequisite for cooperation and transfer of requirements

Compliance with this agreement is a prerequisite for cooperation with Hoyer.

Suppliers can find out more about the risks we prioritise in our policy statement on human rights. These can provide guidance as to which human rights and environmental risks from suppliers require particular attention.

Firstly, we expect our suppliers to fulfil the following expectations in their own business area. The supplier shall take suitable and appropriate measures to fulfil the following expectations as effectively as possible. The supplier can use industry-specific recommendations such as the "Oil and Gas Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights" as a guide. In particular, we expect the supplier to enable its employees to fulfil these requirements. If there are any questions about expectations, we will be happy to provide further information, offer training and further education and coordinate the procedure together.

In addition, the supplier will also appropriately address human rights and environmental expectations along its supply chain. To this end, the supplier should enter into suitable contractual agreements with its own suppliers and take appropriate and necessary measures to verify that its business partners and suppliers also fulfil these expectations. Hoyer is happy to cooperate if the supplier wishes to take joint measures in the upstream supply chain.

Applicable laws

The basic prerequisite for a business relationship with Hoyer is full compliance with applicable laws, including applicable national and international trade regulations. Hoyer shows no tolerance whatsoever for the violation of applicable laws.

This relates in particular to compliance with national legislation and standards in countries other than the Federal Republic of Germany in which suppliers are based. The following principles must be observed:

Human rights:

- International Human Rights Charter of the United Nations (UN)
- Principles of the United Nations Global Compact (UN)
- Rights and core labour standards of the International Labour Organization (ILO)

Environment:

- Paris Agreement on climate change to reduce climate-damaging emissions
- Basel Convention on Transboundary Movements of Hazardous Waste¹
- Stockholm Convention on Persistent Organic Pollutants²
- Minamata Convention on Mercury³

Hoyer is guided by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Hoyer does not accept any violations of these principles and will take action in accordance with applicable laws in the event of possible incidents. To this end, Hoyer has implemented appropriate, effective and robust processes.

¹ BGBl. 1994 II p. 2703, 2704

² BGBl. 2002 II p. 803, 804

³ BGBl. 2017 II p. 610, 611

Money Laundering Act and Sanctions

Money laundering is neither practised, supported nor facilitated at Hoyer. Business partners do not participate in such practices and implement appropriate risk-based processes to prevent money laundering and terrorist financing. This also applies to existing sanctions and any other trade restrictions. Any violations will be penalised with the termination of the business relationship.

Antitrust law and fair competition

Hoyer is convinced that free and fair competition is beneficial to the economy as a whole. We comply with laws that protect and promote competition, in particular antitrust laws. Hoyer complies with the regulations of antitrust law and supports fair competition and free markets. Hoyer does not permit any agreements that violate antitrust law. Hoyer therefore consistently rejects any involvement in anti-competitive business practices. Hoyer expects the same from its suppliers. Prices and other contractual conditions are formed in free and fair competition. Markets, customers and suppliers are not divided up. Production adjustments are not discussed with competitors.

Prohibition of corruption

Hoyer strictly rejects any form of corruption. The same applies to the offences of theft, embezzlement, fraud or extortion. Any granting of advantages to individual private persons, public officials, companies or groups of persons with the aim of actively or passively influencing decision-making processes must also be rejected by suppliers. The supplier implements appropriate risk-based processes to prevent corruption.

Fairness and conformity in wages, working hours and social benefits

Suppliers strictly adhere to the basic principles of minimum wage, applicable overtime regulations and statutory social benefits for all remuneration and social benefits. Suppliers do not tolerate child labour at any stage of production or processing (ILO Convention N° 138, 182).

Child labour includes in particular

- the employment of children before the end of their compulsory schooling or under the age of 15, except in permissible exceptional cases.
- all forms of slavery, child trafficking, servitude, debt bondage, forced labour, forced recruitment of children for armed conflict.
- any direct or indirect involvement in child prostitution and child pornography.
- any direct or indirect involvement in other illicit activities by children.
- any working conditions that jeopardise the health, safety or morals of children.

Appropriate measures by the supplier may include age checks, educational work and anonymous reporting channels. Adequate wages in particular can contribute to families not considering employing children.

Suppliers comply with the applicable statutory working hours and rest periods, remuneration, minimum income and social benefits. In order to provide employees with an adequate standard of living, suppliers grant at least the applicable minimum wage at the place of employment. If the statutory minimum wage does not cover the cost of living, the suppliers will endeavour to adjust the remuneration appropriately.

The deployment of external personnel must always be in accordance with national legislation. Hoyer encourages its suppliers and international partners to monitor business areas, particularly in consideration of human risks such as occupational health and safety, inhumane treatment and the protection of life and limb.

Suppliers will not use private and public security forces if this leads to the curtailment of freedom of association and union, injury to life and limb, torture or other inappropriate treatment due to a lack of instruction or control.

Business practices

»The satisfaction of our customers is our priority. We achieve this by offering high-quality products and a trusting, respectful relationship with our employees, who have the highest level of expertise thanks to continuous training and further education.«

Quality of the goods and services offered

Hoyer stands for the highest quality of goods and services. To be able to fulfil this promise, Hoyer needs suppliers who share this claim. We expect agreed quality standards to be adhered to. Hoyer encourages suppliers to carry out regular internal and external audits (e.g. in accordance with DIN ISO 9001).

Dealing with colleagues, customers and business partners

The basis for working with Hoyer is the highest level of integrity and decency. Suppliers avoid the "evil appearance". Suppliers will only make gifts or invitations in connection with the business relationship with Hoyer within the legally permissible framework and with great restraint. In any case, it must be ensured that the recipient is not subject to any kind of influence, regardless of whether this is intentional or unintentional. Under no circumstances may business partners accept or grant any benefits in order to influence commercial decisions.

Hoyer consistently rejects any kind of influence peddling or bribery. This also applies to suppliers in Germany and abroad. Infringements may result in the immediate termination of the business relationship.

Conflicts of interest

Hoyer expects that the cooperation will take place at arm's length. Any conflicts of interest of suppliers must be reported to Hoyer immediately. In the event of conflicts of interest that may arise from cooperation with business partners, Hoyer encourages suppliers to clarify these matters appropriately.

Data protection and information security

In the modern information society, data protection is of great importance for the protection of the individual. Suppliers comply with applicable data protection laws and information security regulations.

Foreign trade

In international trade, Hoyer encourages its suppliers to comply with national and international foreign trade regulations. Particular attention is paid here to export control and embargo regulations as well as the control of unauthorised business activities with sanctioned persons, companies and organisations.

Health and (occupational) safety

»The health and safety of our employees, customers and suppliers is our greatest asset. For this reason, care is taken without exception to protect and constantly improve them. We expect the same from our suppliers.«

Occupational health and safety

As a responsible employer, suppliers recognise the issue of safety as a fundamental pillar. Suppliers reduce potential hazards in the workplace through appropriate safety standards and protective measures for the workplace, workstation and work equipment. Suppliers should be guided by recognised standards such as ISO 45001. Appropriate measures are taken to ensure the responsible handling of chemical, physical or biological substances to protect employees. When working with suppliers abroad, Hoyer also attaches great importance to compliance with the law on occupational health and safety and its applicable obligations in accordance with the respective national legislation.

Health

Suppliers comply with occupational health and safety regulations. This includes applicable laws on breaks, rest periods and time off. The working hours may not exceed the legally prescribed maximum values.

Corporate responsibility, sustainability and environmental protection

»As a family business, we have a special obligation towards our employees, business partners and our environment and are always aware of this social responsibility. For this reason, sustainability is an integral part of our business relationships in order to protect current and future generations.«

Motivation for sustainable behaviour

Hoyer is not only concerned with the protection of human rights, but also with a sustainable approach to the environment. Hoyer also expects a similar commitment from its suppliers. We encourage suppliers to submit ideas and suggestions for improvement in order to continuously improve processes and further strengthen sustainability.

Conservation of resources, CO₂ reduction and compliance with environmental standards

Suppliers use resources sparingly and carefully. This also includes taking early and appropriate measures to avoid or reduce environmental damage altogether and to ensure the use of the best available technology. Suppliers reduce direct and indirect emissions along the supply chain and work continuously to improve the energy balance against the background of renewable energies and alternative energy sources.

In their business activities, suppliers take a holistic view of the product life cycle and take appropriate measures to conserve resources from development to disposal. Waste is also disposed of exclusively by certified specialist companies in accordance with the applicable legal regulations.

Handling of conflict minerals

Suppliers fulfil their responsibility in the area of conflict materials and high-risk raw materials. Suppliers support Hoyer in fulfilling its duty of care with regard to the handling of raw material supply chains and the associated protection of human rights and the environment.

Protection of natural resources

Hoyer suppliers protect natural resources. Suppliers avoid harmful soil change, water or air pollution, harmful noise emissions and excessive water consumption, particularly in the vicinity of production sites, so as not to significantly impair food production, impede or completely prevent access to safe drinking water or sanitary facilities or damage health.

In order to avoid social imbalance in the regions of the production sites and to secure the livelihoods of local people, Hoyer rejects unlawful forced eviction or the unlawful seizure of land, forests and water. Suppliers take this into account in particular when acquiring, developing or otherwise utilising these properties.

Handling of hazardous substances

With regard to hazardous substances such as mercury or persistent organic pollutants, Hoyer complies with the applicable laws and regulations. If suppliers come into contact with the following substances or waste, they must ensure that they are handled appropriately. This applies accordingly to hazardous waste.

Prohibition of discrimination

Hoyer has been campaigning for jobs without discrimination for many years. Hoyer also expects this from suppliers. Suppliers do not discriminate on the basis of national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, unless this is justified by the requirements of employment. In addition, unequal pay – particularly between the sexes – for work of equal value is prohibited. The same applies to any form of sexual harassment or sexual exploitation.

Forced labour

Suppliers are committed to working without coercion or threat of punishment in accordance with the ILO core labour standards (Convention N^o 29) and the International Covenant on Civil and Political Rights. This means fundamental transparency for suppliers and business partners with regard to forced labour and human trafficking and their rejection. Labour services that are based on serfdom, slavery or other forms of exploitation or humiliation are also not accepted. Suppliers are therefore expected not to permit the employment of persons in forced labour or any form of slavery or slavery-like practices. Among other things, the supplier must ensure setting a reasonable notice period for the termination of the employment relationship by the employees. Violations of this rule will be severely penalised.

Freedom of association and freedom of expression

Of course, not all employees are always of the same opinion. Suppliers uphold the right to freedom of association, the freedom to organise and join trade unions, the right to strike and the right to collective bargaining. Trade unions may operate freely in accordance with the law of the place of employment. Hoyer rejects the curtailment of these fundamental employee rights within the supply chain. Suppliers will not take any unjustified discriminatory or retaliatory measures against employees because of the foundation, accession and membership. Suppliers endeavour to deal openly and constructively with employee and trade union demands.

Hoyer attaches particular importance to the protection of freedom of opinion, personal rights and privacy. It serves as the basis for respectful communication and respectful interaction within the organisations. For Hoyer, it is therefore particularly important that suppliers can also identify with these principles.

Realisation of the requirements

Risk management

The supplier agrees to enable Hoyer to fulfil its due diligence obligations through appropriate, active and truthful cooperation. This includes appropriate participation in preventive measures. The duties of care arise, for example, from the German LkSG.

The supplier should have clear responsibilities for the implementation of this Supplier Code of Conduct. The expectations outlined and, in particular, the human rights and environmental risks should be adequately taken into account in the relevant processes. Accordingly, the supplier implements appropriate risk-based measures and procedures to ensure this. Risk-based control measures can enable the supplier to evaluate the effectiveness of the adjustments. Hoyer will work with and support the supplier in a risk-based and appropriate manner.

Training and further education

Hoyer ensures that training and further education on the contents of this Supplier Code of Conduct (and in particular on the human rights and environmental expectations) is carried out within an appropriate framework if required. These can be in-house training courses or training courses organised by third parties such as industry initiatives. The supplier shall ensure that relevant employees can participate in the training and further education programmes.

Documentation obligation and information requests

The supplier shall document the measures it takes to fulfil the expectations formulated in this Supplier Code of Conduct. He shall keep the records for at least seven years from the date of their creation.

The supplier shall provide Hoyer with this and additional information on compliance with the law and this Supplier Code of Conduct upon request.

Before we ask the supplier to provide the relevant information, we carefully check what we need. The reasons for data queries are communicated to the supplier. We guarantee the protection of the transmitted data, but would like to point out that we are publicly obliged to provide information to the Federal Office of Economics and Export Control (BAFA) and within the scope of the reporting obligation in accordance with the LkSG on the extent to which we fulfil our due diligence obligations under the LkSG.

Obligation to notify

The supplier is obliged to notify us of any violation of this Supplier Code of Conduct while safeguarding legitimate interests. The obligation to notify already exists as soon as there are factual indications of a violation. In addition, the supplier agrees to inform us of any significant changes in the risk situation and, in particular, any significant increases in risk. The supplier also provides information about legal processes, official investigations or criminal proceedings that affect the business relationship with Hoyer.

Obligation to report risks or violations

If the supplier discovers significantly increased risks in its own business area or in its supply chain with regard to the aforementioned obligations or actual indications of a violation thereof, the supplier is obliged – insofar as this is legally permissible – to inform us of this immediately after becoming aware of it.

Significantly increased risks may arise, for example, due to changes in the supply chain such as new contractual partners, new production facilities or changes in raw material requirements. This is particularly the case for locations in high-risk countries or areas.

Complaints procedure

An open and honest dialogue culture with its suppliers is very important to Hoyer. Such a culture of dialogue can help to identify risks and violations at an early stage and eliminate them together.

Hoyer has set up a complaints procedure for reporting risks and violations: <https://www.hoyer.de/unternehmen/grundsaeetze/integritaetskanal/>.

Anyone along the entire supply chain can use this complaints procedure to report risks and violations in our own business area, at our suppliers or indirect suppliers.

The system preserves the confidentiality of the whistleblower's identity and protects against discrimination or penalisation based on a bona fide complaint. The supplier informs the employees about this complaints procedure and encourages them to report it. The supplier also ensures that whistleblowers are protected from being penalised or punished as a result of a complaint, unless false information is deliberately provided. The supplier will appropriately communicate the information on the complaints procedure and expectations on the no-retaliation policy to the deeper supply chain.

The rules of procedure are publicly available online here. It is described how the complaint is processed impartially and independently.

Remedial measures

The supplier and Hoyer will work together to prevent, end or at least minimise imminent and actual violations of human rights and environmental obligations in the joint supply chain. The supplier is prepared to cooperate with Hoyer in this respect and in particular provides the necessary information. The supplier shall immediately take appropriate remedial action within the scope of its influence and terminate a violation if this is possible.

If a violation cannot be remedied in the foreseeable future, the supplier shall notify Hoyer immediately and, together with Hoyer, draw up a concept for termination or minimisation, including a schedule.

Hoyer shall be entitled to set the supplier reasonable grace periods for its required cooperation in remedial measures. With the exception of periods for the transmission of information, these are at least four weeks, unless a shorter period is appropriate for the effective protection of high-ranking legal interests such as the life, body or health of a person.

In the event of serious violations of human rights or environmental obligations, Hoyer may temporarily suspend the business relationship until the violation has ended and the risk of further violations has been jointly minimised. The contracting parties are not obliged to fulfil their performance and delivery obligations for this period. The supplier shall be informed immediately in writing of the suspension and resumption of the business relationship.

Control mechanisms

Hoyer reserves the right to check compliance with the laws and the Code of Conduct annually and, for justified reasons (such as sufficient actual indications of violations of the Code of Conduct), also several times after prior notice and within normal business hours at the supplier itself or by external experts in accordance with the applicable legal provisions in writing or on site. The legitimate interests of the supplier are protected and business processes are not impaired as far as possible.

Right of cancellation and compensation for damages

The aim of this Code of Conduct is to take joint responsibility for the supply chain. In particular, we do not terminate the business relationship without further ado due to violations by suppliers or in their supply chain.

In exceptional cases, however, Hoyer is entitled to cancel certain contracts associated with violations and to terminate the entire business relationship and thus cancel any contract. Such an exceptional case exists if:

1. Hoyer assesses the violation of a protected legal position or an environmental obligation as very serious,
2. the implementation of the measures developed in a concept in accordance with section 4.5 does not remedy the situation after the expiry of the time specified in the concept or any grace periods set,
3. Hoyer has no other milder means at its disposal and an increase in its influence does not appear promising.

In the event of such a cancellation, the supplier shall not be entitled to compensation for services not yet rendered. Claims for damages or other claims by the supplier arising from or in connection with such a cancellation are also excluded. Further contractual or statutory cancellation rights remain unaffected.

Hoyer's right to assert claims for damages shall remain unaffected.

Consent to the Hoyer Supplier Code of Conduct

»As a supplier to VISKA B.V. & Co. KG (together with its affiliated companies within the meaning of Section 15 AktG), we support the Hoyer Supplier Code of Conduct by ensuring that our own companies and all companies affiliated with us comply with the specified requirements. In addition, we will encourage our suppliers to do the same.«

- We hereby accept the Hoyer Supplier Code of Conduct in the context of our business relationship as well as the concluded contracts in this context.
- We hereby confirm that we comply with the above stated principles and requirements by applying our own, equivalent Code of Conduct of our Company (attached as appendix).

(please tick as applicable)

We are bound by this declaration until further notice. However, it will become ineffective as soon as an updated declaration is presented from Hoyer and is accepted by us. If we want to withdraw from this declaration, we must communicate this in written form. In this case, the rights to terminate the contractual agreements are reserved in accordance with the specified conditions (page 14).

Location/Date

Signature

Stamp of supplier

The Code of Conduct is binding for the following companies belonging to Hoyer:

Wilhelm Hoyer B.V. & Co. KG
Finke Mineralölwerk GmbH
Hoyer G.m.b.H.
Kontor 53 GmbH
Hoyer Marine GmbH
Hoyer Trading & Supply GmbH
Hoyer Marine Trading GmbH
Hoyer Süd GmbH
Sonnentau Erlebniscampus GmbH
Mycento GmbH
Hoppe Mineralölhandel GmbH
Martin Knudsen Brennstoffe GmbH

Wilhelm Hoyer B.V. & Co. KG
Rudolf-Diesel-Str. 1 · 27374 Visselhövede
Tel. +49 4262 797

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