



Code of Conduct for SEFE Suppliers

**JOINT SUCCESS BY
SHARED RESPONSIBILITY**

Introduction

As an international energy company and a key energy supplier to industrial and corporate customers, we ensure the security of supply in Germany and Europe, whilst driving decarbonization. Our activities span the energy value chain in gas, LNG and electricity, from origination and trading to sales, and storage. At the same time we are investing in clean energies, including the hydrogen ecosystem.

We commit to responsible and lawful conduct as well as high ethical, social and environmental standards in our own business as well as in our business relationships. This commitment is anchored in our governance documents, including:

SEFE **Code of Ethics and Business Conduct**

SEFE **Human Rights Statement**

SEFE **Environmental and Climate Change Statement**

In addition, we expressly endorse, respect and support all internationally recognized human rights across all our business activities, in accordance with:

- The Universal Declaration of Human Rights¹ adopted by the UN General Assembly in Paris on 10 December 1948
- The ILO Declaration on Fundamental Principles and Rights at Work² adopted in 1998 and amended in 2022

Furthermore, we acknowledge and align our business activities with international standards, including:

- The United Nations Guiding Principles on Business and Human Rights
- The Ten Principles of the United Nations Global Compact
- The OECD Guidelines for Multinational Enterprises
- The UK Modern Slavery Act
- The German Supply Chain Due Diligence Act

This SEFE Supplier Code of Conduct specifies our expectations of our suppliers to share these principles and assume their responsibility towards their employees, their own business partners, society, and the environment. We expect our suppliers to actively pursue from upstream suppliers that they abide by consistent principles.

SEFE expects its suppliers to comply with the requirements described herein and to document them by means of appropriate evidence and records.

¹ Consisting of the Universal Declaration of Human Rights and the two main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

² The International Labor Organization's Declaration on the Fundamental Principles and Rights at Work, including freedom of association, the right to collective bargaining, and the rights not to be subject to forced labor, child labour or discrimination in respect of employment and occupation.

Our Expectations

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ETHICAL STANDARDS

All SEFE suppliers shall conduct their business in an ethical manner and act with integrity. These ethical requirements include:

1.1. Business Integrity and Transparency

We expect our suppliers to comply with applicable legal requirements, their internal company guidelines and voluntary commitments. In countries where local laws differ from the standards stipulated herein, we expect suppliers to implement these standards in a manner that does not conflict with local laws. Suppliers are also expected to keep accurate information regarding their activities, governance and performance, and should disclose these in accordance with applicable regulations and industry benchmark practices.

1.2. Compliance with Antitrust Law and Commitment to Free Competition

Suppliers shall comply with applicable antitrust and competition laws. We expect our suppliers to promote free competition and transparent markets and to combat unfair, nontransparent and restricted competition. Suppliers shall take appropriate preventive measures and shall not participate in price, market or supply agreements that result in unfair competition, nor in the division of markets or customers.

1.3. Zero Tolerance for Corruption

Suppliers shall conduct their business consistent with fair and vigorous competition. All forms of bribery, corruption, extortion, and embezzlement are strictly prohibited. Suppliers shall not provide benefits, pay or accept bribes or other unlawful incentives or participate in any illegal inducements, neither in business nor in government relationships.

1.4. Fight against Money Laundering and Payment Fraud

Suppliers shall comply with applicable legal requirements for the prevention of money laundering and terrorist financing. Suppliers shall mitigate their risk of payment fraud, e.g. by specifying the correct contractual partner and correct bank details in their invoices.

1.5. Data Protection, Confidentiality and Cybercrime

Suppliers shall safeguard and make only conscientious and appropriate use of confidential information. When handling personal data, suppliers shall guarantee compliance with applicable national and international regulations in the area of data protection and protect the personal rights and privacy of the persons concerned. Suppliers shall also take appropriate precautions against cybercrime.

1.6. Foreign Trade and Export Control

Suppliers shall ensure that their imports and exports are cleared correctly, and that applicable foreign trade and customs regulations are complied with.

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SOCIAL STANDARDS, HUMAN RIGHTS, HEALTH AND SAFETY REQUIREMENTS

Suppliers shall be committed to uphold the human rights of workers and to treat them with dignity and respect. Social standards include:

2.1. Freely Chosen Employment

SEFE does not tolerate forced, bonded, indentured, trafficked or non-voluntary labor, involuntary prison labor or other kind of forced labor in our supply chain. Practices such as withholding personal property, identification documents, wages, training certificates, work or any other document for inappropriate reasons are not acceptable. Suppliers will risk allegations of complicity if they benefit from the use of such forms of labor by their business partners. Suppliers must apply additional diligence when engaging migrant workers directly or indirectly.

2.2. Child Labor

Suppliers must forbid all kinds of child labor.³ Suppliers shall establish robust age-verification mechanisms as part of the recruitment process, which may not be in any way degrading or disrespectful to workers.

2.3. Non-Discrimination and Equal Opportunities

Suppliers shall not discriminate, exclude or have a certain preference for persons on the basis of gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in unions or any other legitimated organizations, political affiliation or opinions, sexual orientation, family responsibilities, marital status, or any other condition that could give rise to discrimination. In particular, workers shall not be harassed or disciplined on any of the grounds listed above.

We expect equal opportunities and equal treatment to be an essential part of the supplier's corporate policy. The development and expansion of employees' professional skills must be promoted at all levels through appropriate training and further education measures.

2.4. Fair Treatment

We expect our suppliers to treat their employees with dignity and respect. Suppliers will provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers and with no threat of any such treatment, whether this imposed by own employees or mandated private or public security forces.

2.5. Fair Wages and Regular Working Hours

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Compensation should aim at providing the workers a decent living for themselves and their families. Wages are to be paid in a timely manner and regularly. The use of overtime is meant to be exceptional, voluntary, paid at a special rate and shall not represent a significantly higher likelihood of occupational hazards.

2.6. Freedom of Association and Collective Bargaining

We expect suppliers to recognize the fundamental right of employees to form, join, or consider joining labour unions and employee representatives, and to engage in collective bargaining. The establishment, affiliation or membership of a labour union and the openly addressing of working conditions shall not result in unequal treatment or other threat of reprisal, intimidation or harassment. Employee representatives must not be discriminated against, their access to workplaces must be guaranteed. In situations where the right to collective bargaining is restricted by law, suppliers shall offer reasonable alternatives to cooperation within the workforce.

³ The applicable definition of child labor shall be that in the regulations of the United Nations or the locally applicable laws and regulations, whichever is stricter.

2.7. Conflict Minerals

Certain raw materials, intermediate products and services pose particular human rights and environmental risks. These include, for example, metallic and mineral raw materials, including conflict and high-risk minerals, as well as renewable raw materials. Suppliers shall ensure that products supplied to SEFE do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups that commit serious human rights abuses.

2.8. Rights Of Local Communities and Indigenous Peoples

We expect suppliers to respect the rights of local communities and indigenous peoples who may be affected by suppliers' operations. This applies in particular to the acquisition of land and land use.

2.9. Health and Safety at Work

Suppliers shall make adequate provision for a safe and healthy working environment and offer their employees active occupational health protection. Necessary measures must be taken to prevent accidents and health injuries that may occur in connection with or during their work. Service providers and contractors working on SEFE sites are expected to actively participate in our SEFE safety programs.

Suppliers shall provide appropriate controls, safe work procedures, preventative maintenance, and necessary technical protective measures to mitigate health and safety risks in the workplace and in any company-provided living quarters. When applicable, suppliers shall provide employees with appropriate personal protective equipment.

2.10. Emergency Preparedness & Response

Suppliers shall identify and assess emergency situations in the workplace and any company provided living quarters, and minimize their impact by implementing appropriate fire protection, effective emergency plans, regular drills and response procedures.

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ENVIRONMENTAL STANDARDS

We take responsibility for the environment and climate. We expect our suppliers to develop and manufacture products in an environmentally friendly manner, use resources such as energy, water, and raw materials sparingly and efficiently, comply with all applicable environmental and climate protection requirements, and continuously improve their environmental performance.

3.1. Environmental Certificates

Suppliers shall comply with all applicable environmental regulations. The requirements of the Minamata, Stockholm and Basel Convention must be observed. All required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

3.2. Decarbonization, Improved Energy Efficiency, Energy Transition

We expect our suppliers to continuously strive to limit their broader environmental footprint by reducing carbon emissions, actively seeking lower carbon and renewable energy sources, implementing energy efficient measures, purchasing sustainable products and adopting more sustainable energy practices.

3.3. Waste Management and Emissions

Suppliers shall avoid waste generation and have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

3.4. Biodiversity

Suppliers shall examine their operations to identify where they may potentially affect biodiversity, undertake assessments to better understand the impacts and explore initiatives to protect and enhance natural ecosystems.

3.5. Natural Resource Conservation and Climate Protection

Suppliers shall use natural resources (e.g. water, soil, air, sources of energy, raw materials) in an economical and efficient way and preserve them. To ensure the conservation of renewable natural resources, suppliers shall promote the application of recognized sustainability standards and certifications. Negative impacts on the environment and climate caused by the suppliers or in their supply chain shall be minimized or eliminated.

Practices are encouraged to comply with circular economy principles such as material reduction, substitution, collection, sharing, maintenance, reuse, redistribution, refurbishment, remanufacturing and recycling. Suppliers shall engage in the development and use of environmentally and climate-friendly products, processes, and technologies.

Suppliers shall ensure and demonstrate continuous environmental improvements, including a reduction in raw materials, energy, emissions, discharges, noise, waste, hazardous substances, and reliance on natural resources.

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IMPLEMENTATION OF THE STANDARDS

Suppliers' implementation of and adherence to these standards can be demonstrated by reference to their own Code of Conduct or other corporate policies which contain comparable standards. Suppliers which do not have such principles in place, are expected to undertake compliance with this SEFE Supplier Code of Conduct. To implement the standards, we expect our suppliers in particular to ensure:

4.1. Commitment and Accountability

Suppliers shall demonstrate commitment to the concepts described in this document and maintain high standards of openness and accountability in particular by encouraging their employees and partners to speak up if they feel that something "is not right".

4.2. Legal and Customer Requirements

Suppliers shall identify and comply with applicable laws, regulations, industry standards, ILO and UN conventions and relevant customer requirements. Should the requirements of this SEFE Supplier Code of Conduct go beyond the locally applicable laws and regulations, SEFE Suppliers shall use best endeavors to observe these rules.

4.3. Risk Management

Suppliers shall have mechanisms to appropriately determine and manage risks in all areas addressed by this document and with respect to all applicable requirements. Shortcomings must be eliminated or continuously improved as part of this systematic management process.

4.4. Documentation

Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

4.5. Training and Awareness Raising

Suppliers are expected to build sufficient competence among their employees, managers, workers, and workers representatives in order to embed the principles and practices of this SEFE Supplier Code of Conduct in their business operation successfully.

4.6. Continuous Improvement

Suppliers shall demonstrate their commitment to continuous improvement by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by assessments, inspections and management reviews.

4.7. Communication

Suppliers are expected to have effective systems to communicate the principles set forth in this SEFE Supplier Code of Conduct to workers, contractors, and suppliers further down the supply chain.

4.8. Grievance Mechanisms

Suppliers shall provide accessible and secure means for their employees and affected persons to report concerns or potentially unlawful activities in the workplace without threat of reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action if needed.

4.9. Cascading of Standards within the Supply Chain

Suppliers are expected to encourage their upstream suppliers to comply with appropriate standards.

Our Approach

SEFE is willing to work together with its suppliers to ensure that they comply with the abovementioned standards of the SEFE Supplier Code of Conduct and to support them in their efforts of continuous joint improvement.

Depending on the risk classification of the supplier SEFE reserves the right to verify the implementation and compliance with these standards, e.g., through self-disclosures, audits, evaluations by third parties, certificates/ statements, contractual assurances as well as assessments and audits on site. If suppliers do not meet these standards, SEFE expects the improvement of the supplier as a prerequisite for establishing or maintaining business relationships. In the event of serious risks, violations or when SEFE does not see any improvements regarding identified risks and actual violations, SEFE reserves the right to either temporarily suspend business relationships as long as the violation continues or to terminate them as a last resort with suppliers who cannot demonstrate their adherence to this SEFE Supplier Code of Conduct.

In the event of continuing risks or violations, SEFE reserves the right to demand contractual assurances from the supplier, e.g. regarding the clarification of the risks or violations, the alignment of specific requirements and preventive/ remedial measures to prevent or minimize the risks and/ or violations and the agreement on a joint action plan.

Questions and Contact / Raising Concerns

**If you have any questions about this SEFE Supplier Code of Conduct,
please contact:**

SEFE Legal & Compliance Team

E-Mail: compliance@sefe.eu

SEFE ESG Team

E-mail: ESG@sefe.eu

Information on possible or actual violations of these standards can be reported via SEFE's externally hosted whistleblowing system.