



Code of Conduct for Suppliers and Subcontractors

Status: 05/2025

BERTRAM is committed to fundamental human rights, labor rights, environmental protection, and the fight against corruption in all its business activities. This includes the establishment of sustainable relationships with our suppliers. We expect our suppliers to comply with the applicable national laws, the principles of the United Nations Global Compact, and this BERTRAM Code of Conduct for Suppliers and Subcontractors.

1. Treatment of Employees

BERTRAM expects its suppliers to adhere to the fundamental labor rights set out by the applicable national legislation. In addition, BERTRAM expects suppliers to acknowledge the core labor standards of the International Labour Organization (ILO), taking into account the laws and legal frameworks in place in the various countries and locations.

1.1. Child Labor

Child labor, as defined by ILO conventions, and the exploitation of children, as well as the support of child labor or exploitation by suppliers, will not be tolerated. The minimum age for employment is 15 years, or the legal minimum age, if this is higher than 15 years.

1.2. Human Rights

The supplier respects and supports the adherence to internationally recognized human rights and ensures that it does not engage in human rights violations.

1.3. Forced Labor and Human Trafficking

The supplier must refrain from all forms of forced or compulsory labor, as well as involuntary prison labor. Participation in human trafficking, the use of violence, and the employment of involuntary or slave labor is prohibited.

1.4. Discrimination and Equal Opportunities

BERTRAM expects its suppliers to promote equal opportunities and fair treatment, preventing discrimination in the hiring of employees, as well as in promotions or the provision of training and development opportunities. No employee should be disadvantaged on account of their gender, age, skin color, culture, ethnic origin, sexual identity, disability, religion, or worldview.

1.5. Occupational Health and Safety

BERTRAM expects its suppliers to comply with the applicable national laws on health and safety regulations.



1.6. Compensation and Working Hours

Compensation and social benefits must be provided in accordance with the basic principles of minimum wages, overtime, and legally mandated social benefits. Working hours must comply with applicable laws and industry standards or relevant ILO conventions.

1.7. Freedom of Association and Collective Bargaining

BERTRAM expects its suppliers to respect the rights of employees to form worker organizations and engage in collective bargaining in accordance with national laws.

2. Behavior in the Business Environment

2.1. Corruption and Bribery

BERTRAM expects its suppliers not to tolerate corruption and to ensure compliance with United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions on combating corruption, as well as applicable anti-corruption laws. In particular, they must ensure that their employees, subcontractors, or representatives do not offer, promise, or grant benefits to BERTRAM employees or third parties close to them with the intent to gain a contract or other business advantages.

2.2. Fair Competition

We do not tolerate any actions, agreements, or arrangements that restrict competition in any way. Suppliers should neither engage in anti-competitive agreements with competitors nor misuse any potential dominant market position.

2.3. Money Laundering

Our suppliers must comply with relevant laws on anti-money laundering and must not engage in money laundering activities.

2.4. Avoidance of Conflicts of Interest

A conflict of interest occurs when there is a risk that secondary personal or institutional interests could compromise primary business interests. BERTRAM suppliers must make their business decisions solely based on objective criteria.

3. Environmental Protection

Our suppliers must avoid endangering people and the environment, minimize environmental impact, and use resources efficiently.



4. Conflict-Free Sourcing of Minerals

Suppliers must be aware of the potential connection between the extraction of raw materials and armed conflicts or serious human rights violations. If minerals are sourced from conflict zones or high-risk areas, the OECD Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas must be followed.

5. Supplier Relationships

BERTRAM expects its suppliers to communicate all the principles and requirements outlined here to their subcontractors and suppliers, and to consider them when selecting suppliers. Suppliers should encourage their subcontractors and suppliers to comply with the described standards regarding human rights, labor conditions, anti-corruption practices, and environmental protection as part of fulfilling their contractual obligations.