

# **CODE OF CONDUCT FOR SUPPLIERS & SERVICE PROVIDERS (SUPPLIER CODE OF CONDUCT)**



# Code of Conduct for Suppliers and Service Providers (Supplier Code of Conduct) of Mitsubishi Power Europe GmbH

## 1. INTRODUCTION

Respect for applicable laws and regulations as well as social and environmental values in Germany and all countries in which we do business is a central component of the corporate culture and guiding principle for the Management of Mitsubishi Power Europe GmbH ("Mitsubishi"). We expect the same from our suppliers and service providers - also along their own supply chains.

This Supplier Code of Conduct defines the requirements for our suppliers and service providers with regard to the relevant ethical, social and ecological aspects such as business conduct with integrity, human rights, working conditions and environmental protection. The consent of the supplier or service provider with this Supplier Code of Conduct and the orientation towards the principles of the United Nations Global Compact, of which our ultimate parent company, Mitsubishi Heavy Industries, Ltd. (MHI), is also a member, is mandatory and indispensable for our cooperation.

This Code of Conduct supplements the regulations in the MHI Group Global Code of Conduct ([Mitsubishi Heavy Industries, Ltd. Global Website | MHI Group Global Code of Conduct](#)), which continues to apply in full and is also available in various languages.

## 2. COMPLIANCE AND FAIRNESS

We expect our suppliers and service providers to comply with all applicable laws and regulations in the countries in which they operate. This includes national and international regulations as well as local and industry-specific provisions (such as the German Supply Chain Act - LkSG).

Suppliers and service providers shall ensure that they operate an effective system that is suitable for ensuring that employees act in accordance with laws and regulations and, in particular, avoid corruption, violations of antitrust law and competition law, money laundering and the financing of terrorism.

Economic crimes and other criminal offenses as well as administrative offenses are not tolerated in any form. Unlawful behavior, such as agreements that violate competition or antitrust law, or breaches of customs, foreign trade and embargo regulations, must always be investigated internally.

Misrepresentation of subsidy-relevant facts to the subsidy provider through false information or certifications, or the use of material or monetary subsidies in contradiction to the subsidy conditions will not be tolerated under any circumstances.

All relevant legal obligations regarding the prevention of money laundering and the prohibition of financing terrorism, as well as tax and duty regulations, are complied with and consistently implemented. This also applies to truthful and complete accounting.

Conflicts of interest with private or other activities must be avoided in our business relationship. Particular attention must be paid to family relationships, ties of friendship, invitations and gifts.

Trade and business secrets as well as patents, copyrights, trademarks and other forms of

intellectual property are always respected by our suppliers and service providers.

Personal data is protected in accordance with requirements of relevant data protection laws, in particular the GDPR, and adequate information security and documentation standards are ensured, especially with regard to IT infrastructure.

Product safety must be ensured and relevant industry standards be met.

## 3. HUMAN RIGHTS AND SOCIAL STANDARDS

For us, respect for human rights and good and safe working conditions are fundamental to all our actions. Our suppliers and service providers in particular respect and ensure compliance with the following standards, also along their own supply chains:

- Prohibition of child and forced labor
- Prohibition of slavery and human trafficking
- Prohibition of illegal employment and undeclared work
- Occupational safety, accident prevention and health protection (particularly with regard to hazardous substances)
- Freedom of association and the right to collective bargaining and agreements
- Equal opportunities and prohibition of discrimination in employment, in particular on the grounds of gender, age, ethnic origin, religion, sexual orientation, nationality, skin color, disability or trade union membership
- Fair remuneration in line with collective agreements, industry and local standards (including the minimum wage requirement)
- Compliance with working time regulations and laws

- Protection of local communities and indigenous peoples
- No repression against human rights defenders
- Protection against bullying, sexual harassment and other inappropriate behavior

#### **4. ENVIRONMENTAL PROTECTION AND SUSTAINABILITY**

We expect our suppliers and service providers to comply with environmental protection requirements in applicable national laws and regulations as well as with international standards, and to continuously minimize environmental pollution and risks to the environment (in particular for soil, water, forests and plants, air, noise, climate and biodiversity). In addition, our suppliers and service providers undertake to use resources responsibly and efficiently and, where possible, to systematically reduce waste and environmental pollution.

Energy-efficient operations must be ensured in production processes.

The release of emissions with negative effects on human health, the climate or the environment must be reduced as far as possible or avoided at all respectively.

The regulations on animal protection and animal welfare must be observed.

Hazardous substances and chemicals must be procured, stored, used and disposed of safely. Employees must receive regular training in this regard.

Relevant environmental protection standards must be ensured by our suppliers and service providers for all products manufactured along the supply chains.

#### **5. OBLIGATION TO IMPLEMENT THE REQUIREMENTS**

Mitsubishi is entitled to verify compliance with this Supplier Code of Conduct on a regular and ad-hoc basis by means of measures, such as self-assessments, submission of certificates and information from third parties. Upon request, the supplier or service provider shall provide Mitsubishi with all necessary information that is reasonably required for verification against the standards of this Supplier Code of Conduct, also along the supply chain.

Suppliers and service providers shall also allow Mitsubishi or a third party commissioned by Mitsubishi to carry out an on-site audit, after reasonable notice in advance and during regular business hours, to check whether the requirements of this Supplier Code of Conduct are also being complied with along the supply chains. Mitsubishi shall ensure that data and business secrets are protected.

In case violations of this Supplier Code of Conduct are identified, the supplier or service provider undertakes to take remedial or improvement measures within a reasonable period of time and in consultation with Mitsubishi. If no remedial or improvement measures are taken within a reasonable period of time or if their implementation is not proven to Mitsubishi, Mitsubishi is entitled to suspend the business relationship in whole or in part and, in the event of continued non-compliance, to extraordinary termination after setting a reasonable deadline. Statutory rights to extraordinary termination for good cause and with immediate effect remain unaffected by this, as does the right to compensation. Good cause exists in particular if, due to the severity of the breach of duty by the supplier or service provider, a continuation of the

contractual relationship is unacceptable for Mitsubishi.

Violations of the requirements of this Supplier Code of Conduct as well as reasonable suspicion of a violation (also along the supply chain) must be reported to Mitsubishi by the supplier or service provider immediately after becoming aware of them, if possible in writing. For this purpose, the responsible contact person or the Compliance & Internal Controls Dept. ([compliance@eumhi.com](mailto:compliance@eumhi.com)) at Mitsubishi must be contacted. Suppliers and service providers are obliged to proactively clarify any suspected cases and to cooperate with Mitsubishi without reservation.

## **6. INCLUSION**

Suppliers and service providers of Mitsubishi undertake to comply with the requirements of this Supplier Code of Conduct and guarantee compliance with them along their supply chains when providing the contractually owed service. The Supplier Code of Conduct supplements the existing contract between the supplier or service provider and Mitsubishi. The supplier or service provider is also obliged to take the necessary precautions to ensure that the requirements are also implemented along its supply chains, in particular vis-à-vis its suppliers. This means that the supplier or service provider shall base business relationships with its suppliers on the standards of this Supplier Code of Conduct and shall oblige them to comply with such along their supply chains.

**Impressum:**

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