



CODE OF CONDUCT FOR SUPPLIERS

Mission Statement and Self-Image

We bring safety to the world—reliably, responsibly, and together. This commitment does not end at our own factory gates, but extends to all partners in our supply chain.

The IDT Group, with all its companies and locations, is committed to responsible business conduct—toward customers, employees, society, and the environment. Our corporate policy provides the overarching framework. This Supplier Code of Conduct specifies what we expect from our suppliers, service providers, and contractors.

For us, sustainability and integrity in the supply chain are not a given, but a shared responsibility. We carefully select our partners and maintain long-term business relationships based on mutual trust. This Code reflects this commitment—and sets out the IDT Group's expectations for all partners in the supply chain. It supplements contracts and applies to direct suppliers as well as subcontractors. Compliance is mandatory.

Our Principles

Values and Core Principles

Suppliers support ethical, lawful, and sustainable conduct. Key references include the ILO Core Labor Standards, the Universal Declaration of Human Rights, the German Supply Chain Due Diligence Act (LkSG), the GDPR, antitrust and competition law, anti-corruption, and occupational safety.

Human Rights and Working Conditions

Prohibition of child labor (at least the applicable higher age of protection); prohibition of forced or compulsory labor; fair compensation at least in accordance with the law or collective bargaining agreements; working hours, breaks, and rest periods in accordance with the law; safe and hygienic working conditions; freedom of association, and collective bargaining; no use of disciplinary measures that are degrading; protection against harassment and abuse.



Equal Treatment and Diversity

No discrimination based on gender, identity, ethnicity, nationality, religion, ideology, disability, age, sexual orientation, or other legally protected characteristics. Decisions are made based on performance and suitability.

Environmental and Resource Protection

Compliance with all environmental laws; resource and energy efficiency; responsible use of water; minimization of emissions, waste, and hazardous substances; proper disposal and recycling; use of environmentally friendly materials; emergency preparedness (e.g., leaks, fire).

Due Diligence in the Supply Chain

Our suppliers commit to implementing appropriate and risk-based measures to ensure the responsible management of their supply chain. The appropriateness of these measures depends on the nature, scope, and risk of the business (risk-based approach).

This includes:

- the identification and assessment of relevant risks in their own business processes and in the upstream and downstream supply chain,
- the formulation and implementation of principles for responsible conduct (e.g., human rights, working conditions, environmental protection),
- the initiation of appropriate preventive and remedial measures when potential or actual violations are identified,
- the assignment of clear responsibilities for sustainability and compliance in the supply chain,
- adequate documentation that enables verifiable compliance with these expectations,
- the establishment of a confidential reporting channel through which concerns regarding misconduct can be reported,
- as well as the communication of these fundamental requirements to our own subcontractors.

Data Protection and Information Security

Personal data is processed in accordance with the GDPR in a lawful, purpose-limited, data-minimal, and secure manner. Suppliers implement technical and organizational measures (access control, encryption, backup, security updates). Data protection or IT security incidents related to IDT must be reported immediately.



Integrity, Anti-Corruption, and Conflicts of Interest

No bribery, no granting or accepting of benefits; appropriate gifts/invitations only within socially acceptable limits and never for the purpose of influencing; particularly strict restraint when dealing with public officials. Conflicts of interest must be avoided and disclosed. IDT's internal guidelines/thresholds apply, provided they are contractually agreed upon.

Competition, Antitrust, and Foreign Trade

Agreements pursuant to Art. 101 TFEU (including price, market, and territorial agreements; allocation of customers/markets) are strictly prohibited.

For export controls, the provisions of Regulation (EU) 2021/821 (Dual-Use) apply. Listed goods (Annexes I/IV) as well as unlisted goods falling under catch-all provisions require authorization; corresponding list and sanctions checks are mandatory prior to export or transfer.

Prevention of Money Laundering and Terrorist Financing

Measures for risk-based screening of business partners and transactions; retention of relevant documents; reporting of suspicious activity in accordance with the law.

Protection of Assets and Intellectual Property ()

Careful handling of IDT property (materials, tools, IT, data). Use exclusively for contractual purposes. Protection of trade and business secrets as well as IP rights.

Communication, Public Appearances, and Social Media

Public statements about IDT may only be made with written approval. Confidential information must not be disclosed. Social media activities must not harm IDT's reputation.

Reporting System and Protection Against Retaliation

Suppliers must provide their employees with appropriate channels to report violations internally and protect whistleblowers from retaliation. If a supplier suspects a violation of this Code, IDT expects direct reporting to the appropriate IDT contact person.

Review, Audits, and Remedial Action

IDT is entitled to request evidence, conduct audits, or commission third parties to do so. If deficiencies are identified, action plans must be developed and implemented in a timely manner.



Consequences of Violations

In the event of serious or repeated violations, IDT reserves the right to take contractual measures—up to and including the suspension or termination of the business relationship. In the event of legal violations, authorities may be notified.

Validity, Acceptance, and Disclosure

Upon entering into the business relationship, the supplier acknowledges this Supplier CoC and undertakes to contractually pass it on within its supply chain and to regularly monitor compliance.

A handwritten signature in black ink that reads "Simone Wilson".

Simone Wilson • IDT Holding GmbH
Essen, March 24, 2026