



# SUPPLIER

---

## CODE OF CONDUCT

**Together we act responsibly, ethically and lawfully.**

**zeppelin.com**

 **ZEPPELIN**<sup>®</sup>  
WE CREATE SOLUTIONS



# TABLE OF CONTENTS

I. PREAMBEL	4
Sustainability	4
II. SOCIAL RESPONSIBILITY & HUMAN RIGHTS	5
Exclusion of forced labor	5
Prohibition of child labor	5
Fair remuneration	5
Fair working hours	5
Freedom of association	6
Promotion of diversity & non-discrimination	6
Health and safety in the workplace	6
Handling of conflict minerals	7
III. ENVIRONMENTAL RESPONSIBILITY AND PROTECTION	7
Environmental management system	7
IV. ETHICAL BUSINESS CONDUCT	8
Prohibition of corruption and bribery	8
Fair competition	8
Confidentiality/data protection	8
Material and intellectual property	8
Avoiding conflicts of interest	9
V. COMBATING TERRORISM & EXPORT CONTROL	9
VI. IMPLEMENTATION OF MEASURES	10
VII. REPORTING VIOLATIONS	10



# SUPPLIER CODE OF CONDUCT<sup>1</sup>

## I. PREAMBEL

The Zeppelin Group, i.e. Zeppelin GmbH together with its affiliates („Zeppelin“), bears a special responsibility with regard to responsible, ethical and lawful conduct. As a foundation-owned company, environmental and socially responsible corporate governance is not merely a legal requirement for us, but a matter of course anchored in our corporate culture. For example, Zeppelin joined the [UN Global Compact](#) in 2016.

Our aim is to continuously optimize our business activities, products and services in terms of sustainability. We expect our partners, that is our suppliers, service providers and subcontractors (“suppliers”), to contribute to this in the sense of an overarching approach.

### Sustainability

“At Zeppelin, sustainability means making a long-term, genuine contribution to the environment and society on the strength of our culture as a company that is fit for the future and economically successful.”

In terms of cooperation, the contracting parties hereby agree to the following rules for a common Code of Conduct – even if they impose stricter requirements than the legal framework directly applicable to the supplier. This agreement forms the basis for all future deliveries and projects. The contracting parties agree to comply with the principles and requirements of the Code of Conduct, to comply with the applicable laws and to commit themselves to contractually obliging their subcontractors to comply with the standards and regulations set out in this document.



<sup>1</sup> To aid readability, the pronoun “they” is used in place of male and female pronouns. All personal pronouns should be understood as gender-neutral.



## II. SOCIAL RESPONSIBILITY & HUMAN RIGHTS



Zeppelin advocates the observance of human rights, as ratified in the key international conventions for the protection of human rights. We also consider agreements with the aim of protecting the environment and ensuring fair and healthy working conditions for the employees of our suppliers, our business partners and our Group companies, such as those resulting from the ILO Core Labor Standards, to be directly binding.

We also place this demand on our suppliers.

### Exclusion of forced labor

Zeppelin expects its suppliers to refrain from any form of forced labor or human trafficking in their companies and not to participate in this in any form.

#### Forced labor

"Forced labor refers to activities into which people are forced under the threat of punishment against their will."

### Prohibition of child labor

Zeppelin expects its suppliers to prohibit and refrain from any kind of child labor.

#### Child labor

"Child labor is work for which children are too young or which is too dangerous or exploitative, which damages physical or mental development, or prevents children from attending school."



### Fair remuneration

Zeppelin expects its suppliers to remunerate their employees in accordance with applicable national laws and, in any case, to comply with the statutory minimum wage or industry-standard minimum.

### Fair working hours

Zeppelin expects its suppliers to comply with the applicable national legislation on the creation of fair working conditions and working hours.





## Freedom of association

Zeppelin expects its suppliers to respect their employees and support them in exercising their freedom of association and the right to collective bargaining in accordance with the relevant laws.

### Freedom of association

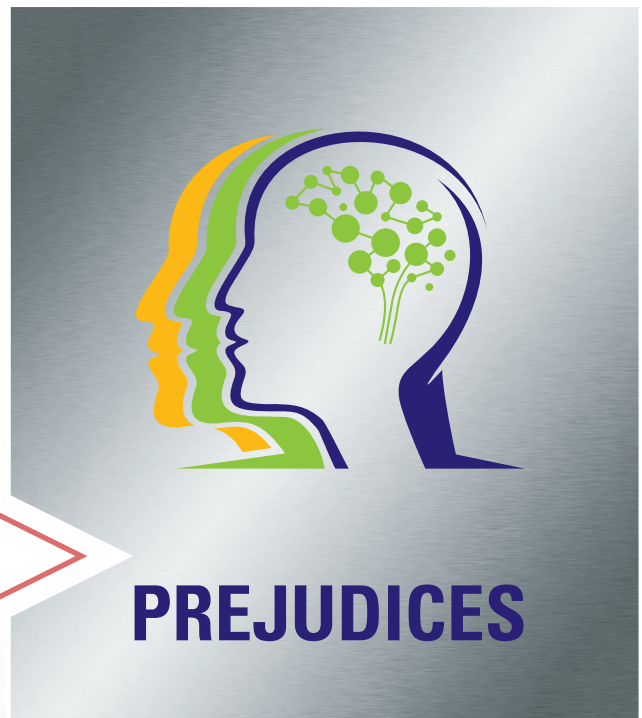
"Freedom of association is the right to unite for common purposes and to strive for them together."

## Promotion of diversity & non-discrimination

Zeppelin expects its suppliers to promote equal opportunities and equal treatment and to prevent discrimination in the recruitment of employees and in the promotion or granting of training and further education measures. No employee shall be discriminated against on grounds of origin, gender, age, skin color, sexual identity, political opinion or religion or belief.

### Discrimination

"Discrimination means disadvantaging or degrading of groups or individuals according to specific values, prejudices or irrational attitudes."



## Health and safety in the workplace

Zeppelin expects its suppliers to comply with the applicable national and international laws regarding health and safety in the workplace and to ensure a safe and healthy working environment.





## Handling of conflict minerals

Zeppelin expects its suppliers of conflict minerals and other raw materials ([cf. currently REGULATION \(EU\) 2017/821](#)) to establish processes in the company that comply with OECD guidelines for the fulfillment of due diligence obligations to promote responsible supply chains for minerals from conflict-affected and high-risk areas.

### Conflict minerals

“Conflict minerals are natural resources or minerals cultivated or extracted in conflict-affected or high-risk areas. In many cases, production and mining takes place illegally. Systematic violations of human rights and international law are often accepted for their acquisition.”



## III. ENVIRONMENTAL RESPONSIBILITY AND PROTECTION

Zeppelin expects its suppliers to promote climate and environmental protection while complying with the relevant environmental protection laws and international guidelines for improving environmental conditions. Zeppelin also expects its suppliers to implement a responsible, sustainable resource management system, thereby reducing negative environmental impacts, and ideally develop and apply an appropriate environmental and/or energy management system (e.g. according to ISO 14001 or ISO 50001).

### Environmental management system

“An environmental management system is the management system of a company in which the organization’s operational environmental policy is defined and organized. The main objective of an environmental management system is the continuous improvement of environmental performance and the continuous reduction of negative environmental impacts.”





## IV. ETHICAL BUSINESS CONDUCT

Zeppelin expects its suppliers to comply with the relevant laws and to define their business activities in accordance with ethical principles.

### Prohibition of corruption and bribery

Zeppelin expects its suppliers to impose the highest standards of integrity and not to participate in any form of bribery or corruption. In doing so, they ensure that business decisions are not influenced by inappropriate or illegal consideration (whether in the form of cash, gifts, travel or other benefits or items of value). No invitations, gifts or other items intended to exert influence may be given to Zeppelin employees.

#### Bribery/corruption

"Bribery or corruption is the giving and/or receiving of gifts and gratuities, financial and in-kind, in order to improperly influence business results."

#### Fair competition

"Fair competition supports antitrust and trade laws, pricing laws, and competition law. They seek to ensure a free market and consumer protection."

### Fair competition

Zeppelin expects its suppliers to comply with and promote the standards of fair business activity, fair advertising, and fair competition. Suppliers shall comply in particular with the relevant antitrust laws.

### Confidentiality/data protection

Zeppelin expects its suppliers to protect confidential information and to comply with data protection laws and contractual provisions.

The protection of personal data and confidential information of customers, business partners, and employees is a matter of course for Zeppelin. For our suppliers, we require technical and organizational measures for data protection to be sufficiently implemented. In accordance with the principles of the EU General Data Protection Regulation (GDPR), data protection must already be ensured in the design and configuration of technical facilities and applications. Based on international standards, Zeppelin expects a high level of information security, which the supplier checks for effectiveness through regular security reviews.

### Material and intellectual property

Zeppelin expects its suppliers to protect the material and intellectual property of Zeppelin and others against loss, theft, and misuse, and to treat any information provided to them as confidential.





## Avoiding conflicts of interest

Zeppelin expects its suppliers to avoid conflicts of interest and their actions to always be characterized by integrity and transparency. Situations that conflict with Zeppelin's business interests shall be avoided. Zeppelin employees may also not hold any financial interest in a supplier's company.

### Conflict of interest

"A conflict of interest is a situation in which professional judgment or action relating to a primary interest is improperly influenced by a secondary interest."



**WHAT IS  
MY TASK?**

## V. COMBATING TERRORISM & EXPORT CONTROL

Implementing and complying with national and international measures to combat terrorism, such as export control regulations, sanctions, and embargoes or regulations to prevent money laundering, is a matter of course for Zeppelin and forms the basis for safeguarding our global business relationships.

Zeppelin expects its suppliers to strictly comply with all applicable international anti-terrorism regulations and to comply with the rules and regulations for import and export control, including the applicable economic embargoes.

### Combating terrorism

"Anti-terrorism measures are understood in particular as those that prevent terrorist offenses and exclude the possibility of financial, economic, or technical means (including know-how) being made available to criminals."





## VI. IMPLEMENTATION OF MEASURES

In the event of a violation of this Code of Conduct, the respective Zeppelin company will review and scrutinize the business relationship, including all associated supply and project contracts with the supplier, and, if the supplier concerned fails to remedy the situation, will terminate the relationship.

The respective Zeppelin company has the right to check compliance with this Code of Conduct at self-determined intervals through a self-assessment conducted by the supplier.

In the event of justified suspicions, the respective Zeppelin company is also entitled to audit the implementation of the requirements set out herein in consultation with the supplier.

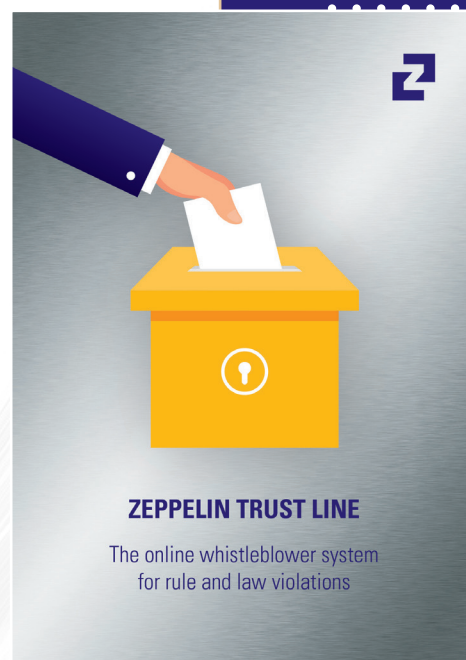
## VII. REPORTING VIOLATIONS

Zeppelin expects its suppliers to submit a report in the event of criminal offenses or the existence of a justified suspicion that Zeppelin employees, our partners, and partners of our suppliers or other third parties are in serious breach of the principles, our values, compliance rules, or applicable law presented herein. For this purpose, we offer the option of providing information via the [Zeppelin Trust Line](#), including anonymously and around the clock.

Business partners can contact our Compliance & Data Protection team directly if they have any questions about this Code of Conduct for suppliers and its implementation.

### Compliance & Data Privacy

Zeppelin GmbH  
Graf-Zeppelin-Platz 1  
85748 Garching bei München  
Email: [compliance@zeppelin.com](mailto:compliance@zeppelin.com)





## IMPRINT

### Zeppelin GmbH

Headquarter:

Graf-Zeppelin-Platz 1  
85748 Garching near Munich  
Tel. +49 89 320 00 - 0  
Fax +49 89 320 00 - 482

Registered office:

Graf-Zeppelin-Platz 1  
88045 Friedrichshafen  
Tel. +49 7541 202 - 02  
Fax +49 7541 202 - 1210

[compliance@zeppelin.com](mailto:compliance@zeppelin.com)  
[zeppelin.com](http://zeppelin.com)

As of 08/2021