

Code of Conduct for Talanx Group Business Partners

We aim to achieve commercial success by basing our activities on a sound business model, complying with the law and addressing the needs of our employees. In the process, we also explicitly accommodate social requirements and the need for environmental protection and to conserve natural resources. In line with this, sustainability is one of the cornerstones of our corporate philosophy. We do not measure our success solely in terms of product and service quality but also by whether our staff behave legally and ethically. This is why all Talanx Group employees worldwide are obliged to comply with our Code of Conduct, which sets out fundamental legal and ethical requirements in greater detail.

It is important to us that you, too, are aware of, and share, the guiding principles behind our actions and how we do business – after all, we see our business relationship with you as a partnership of equals that is based on mutual respect. We have therefore drawn up this Code of Conduct to inform you of our minimum requirements with respect to environmental, social and employee matters, respect for human rights, and anti-corruption and bribery matters. These values are at the heart of a trusting long-term business relationship.

This Code of Conduct is addressed to you in your capacity as a business partner of ours (supplier or consultant). It does not apply if you are active for us in a sales capacity or have already undertaken to comply with other, local principles governing business partners that we have declared to be binding.

Scope of your obligations

By signing this document, you undertake to meet the standards it contains and to oblige your own business partners to comply with comparable requirements. It goes without saying for us that you always comply with all national laws, including labour law requirements, as well as human rights, environmental, health and safety legislation and the Act on Corporate Due Diligence Obligations in Supply Chains. You must obtain, maintain and update all necessary permits, licences and registrations. You must also comply with your reporting requirements regarding economic, social and environmental aspects.

We expect you to take measures to ensure that this Code is complied with. To do this, you must nominate a contact who is authorised to provide information about such compliance. It is also mandatory that your employees are aware of the Code's content.

Monitoring compliance with the Code and consequences of non-compliance

We use a variety of methods to regularly assess our business partners' compliance with the Code of Conduct. Business partners who do not implement appropriate corrective or preventive measures or who are found to have deviated critically from the principles set out in this Code of Conduct will find themselves in increasing danger of being excluded from doing business with us now and in the future.

I. Anti-corruption and bribery matters

You should conduct your business lawfully, ethically and transparently. You may not engage in any form of corruption, bribery, blackmail or misappropriation of funds. Remuneration of all kinds may only relate to the verifiable delivery of products or performance of services.

The value of gifts made to promote business relationships and of invitations or other benefits must not only comply with the legal limits but must also be in keeping with customary local practice and may not give rise to any impression that these courtesies are being employed to gain unlawful or inappropriate advantages.

II. Respect for human rights

We expect you to observe your employees' internationally accepted human rights and to respect the dignity and right to privacy of each and every individual. In particular, you shall not tolerate any form of child labour within your business activities – in line with the standards set out in ILO conventions 138 and 182 (or any stricter standards applicable under relevant national legislation).

You are prohibited from having recourse to forced labour, human trafficking, child labour, involuntary work, or other forms of modern slavery.

You shall actively prevent all forms of discrimination or insulting behaviour towards your employees that is based on their ethnic, national or social origin, nationality, caste, skin colour, gender, age, religion, political opinions, membership of an employee's organisation, physical or intellectual disabilities, sexual orientation or other personal characteristics.

You shall treat your employees fairly; you shall not exert pressure on them, abuse them mentally or physically, or subject them to inhumane practices. Your employees' working times shall comply with the limits set out by the relevant national legislation. The remuneration paid to employees shall be in line with the applicable national laws.

In keeping with local laws, you shall respect your employees' rights to demonstrate, to join a trade union, to set up an employee representative body, to join a works council and to participate in collective bargaining. You are forbidden to discriminate against employees who act as employee representatives.

III. Environmental, social and other employee matters

As our business partner, you acknowledge that assuming responsibility for the environment is an integral part of sustainable producing leading-edge products and services. The negative impacts of production processes on municipalities, the environment and natural resources shall be kept to a minimum. For example, wastage of resources of any kind (e.g. water, paper or energy) must be reduced or avoided at source. Waste water, waste and emissions must be monitored and verified. To this end, all applicable national health, safety and environmental protection requirements shall be observed.

We expect you to work continuously to reduce the environmental impact of your business activities and to promote employee health and safety by providing regular training. This also includes drawing up effective contingency planning, ensuring workplace safety and handling hazardous materials conscientiously.

IV. Data protection and the protection of trade secrets

You and your employees shall treat the Talanx Group's trade secrets as defined by the German Trade Secrets Act (GeschGehG) and other, similar information with the utmost confidentiality and shall not disclose such information to third parties without our prior written permission, or only within the agreed bounds of a written non-disclosure agreement. With respect to any disclosure, you shall comply solely with the legal requirements or with the orders and rulings made by public authorities or the courts. We expect you to take and document appropriate measures to preserve secrecy, and in particular to take precautions to protect such information from unauthorised access. We also expect you, given the need to protect this information, to take appropriate precautions to ensure its confidentiality, availability, integrity and authenticity, and to review and, if necessary, adapt these precautions regularly. You shall inform us without undue delay in the case of any security incidents relating to our information.

In addition, as our business partner you undertake to use the information resulting from our partnership only to fulfil the rights and duties resulting from this business relationship.

You shall comply with the requirements of data protection law when processing personal data. You must observe the data protection requirements for processing data (these primarily relate to the collection, storage, use and disclosure of data). You shall ensure that any subcontractors you commission are engaged in accordance with the requirements of data protection law. You are independently responsible for ensuring data secrecy. When processing personal data, you shall comply with the laws applicable to you, and in particular the European Union's General Data Protection Regulation (GDPR) (to the extent that such processing falls within the scope of the GDPR); this applies especially to the purpose associated with the lawful performance of the tasks in each case. As a business partner, you shall ensure that all necessary personal data protection measures within the meaning of Art. 24 of the GDPR or of other legislation with which you must comply are implemented, so as to ensure that the data protection requirements are met. These may also include appointing a data protection officer and the obligation to inform all employees, and any subcontractors engaged, of the data secrecy requirements, and to require them to abide by them. You are required to provide proof that you have discharged this obligation if asked to do so.

You shall ensure compliance with other laws on the protection of personal data (especially data concerning health), and in particular section 203 of the German Criminal Code (StGB), where this applies, or any other statutory requirements that you must observe.

_____ Place, date

Contact person / Contact details

_____ Signature
