Supplier Code of Conduct of Deutsche Leasing AG

Principles of cooperation with suppliers of indirect procurement



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1 Introduction

Deutsche Leasing AG has been a reliable and responsible asset finance partner for SMEs for over 60 years. Within the Sparkassen-Finanzgruppe, we are the central and internationally oriented network partner and competence centre for leasing and asset finance. Our success is based not only on the knowledge and enthusiasm of our employees, but also on the trust of our customers, business partners and shareholders, the savings banks. It is of fundamental importance that we secure this trust in the long term by acting with integrity.

We have committed ourselves to compliance with the law and to sustainable business practices. Our binding rules and standards are set out in our Code of Conduct. The demands we place on ourselves are similar to the expectations we place on our suppliers, service providers and business partners (hereinafter referred to as "supplier" or "suppliers"). We expect our suppliers to act with integrity and to comply with and implement the following (or comparable) standards. These are based on the applicable national laws and regulations as well as the internationally applicable and recognized principles such as the Universal Declaration of Human Rights, the Conventions of the International Labour Organization and the United Nations Global Compact.



3 Social responsibility

3.1 Human rights, forced labor and child labor

Our suppliers are committed to internationally recognized human rights, support their observance and ensure that they themselves do not cause or participate in human rights violations. They therefore reject all forms of child labor, forced and compulsory labor, modern slavery, involuntary prison labor, human trafficking or other forms of exploitation and take effective action against undeclared work and illegal employment.

3.2 Non-discrimination and fair treatment

Our suppliers prohibit and combat discrimination against their employees or third parties on the basis of age, gender and gender identity, ethnic and social origin, nationality, religion, political opinion or trade union activity, ideology, genetic characteristics, disability or sexual identity. They also do not tolerate any form of verbal, physical or sexual harassment towards employees or third parties. They enable their employees to report incorrect or unlawful behavior in a professional context without the reporting person having to fear any disadvantages.

3.3 Fair employment conditions

Our suppliers guarantee their employees appropriate remuneration and fair employment conditions that at least comply with local legal regulations, particularly with regard to working hours and rest breaks. Appropriate remuneration is at least the minimum wage stipulated by the applicable law.

3.4 Freedom of association

Our suppliers respect the right of their employees to form and join trade unions and employee representative bodies on a democratic basis within the framework of national regulations. They ensure that members of trade unions and employee representatives are neither favored nor disadvantaged.

3.5 Health, occupational health and safety

The health and safety of all employees in the workplace is an absolute priority for our suppliers. They ensure a safe and healthy working environment and consistently comply with the applicable occupational health and safety guidelines. They take all necessary measures to identify and avoid potential risks to the health of their employees and to prevent accidents and occupational illnesses among their employees.

Our suppliers do not engage private or public security forces that practice torture or violate the right to freedom of assembly to protect their business.

4 Ecological responsibility

4.1 Minimizing the environmental impact

We require our suppliers to be proactive in protecting the environment and preserving natural resources and to minimize their impact on the environment.

Our suppliers undertake to comply with the applicable statutory provisions and requirements on environmental and climate protection. This includes in particular the avoidance of air emissions and waste as well as the responsible use of available resources.

4.2 Waste management and natural resources

Our suppliers take suitable and appropriate measures to implement the reduction and avoidance of waste, the reuse of resources, recycling and the safe and environmentally friendly disposal of residual waste, chemicals and waste water.

Our suppliers also undertake to comply with international conventions, in particular the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. In addition, in accordance with the Minamata Convention, no products containing mercury are manufactured and no mercury or mercury compounds are used in the manufacturing process. Furthermore, the production and use of chemicals listed in the Stockholm Convention are not supported.

The procurement and use of raw materials that are mined in conflict or high-risk areas (so-called conflict raw materials) is avoided by our suppliers. If this is not possible, the corresponding legal requirements for due diligence are strictly observed by our suppliers.

4.3 Conservation of natural resources

We demand that our suppliers respect and protect people's natural livelihood. Our suppliers ensure that they do not cause any harmful soil, water or air pollution, noise emissions or excessive water consumption that could lead to a significant impairment of the natural basis for food and drinking water or human health. No one may be unlawfully deprived of access to land, forests or water that is necessary for the preservation of their livelihood.

We demand that our suppliers respect and protect people's natural livelihood.

5 Corporate responsibility

5.1 Compliance with laws and regulations

Our suppliers undertake to comply with the laws applicable to their business activities and to observe the relevant internationally recognized norms, standards and guidelines.

5.2 Fair competition

When competing for customers and business opportunities, our suppliers use only fair and equitable means and comply with the legal requirements of antitrust and competition law. They do not use unfair business practices and do not participate in price fixing or other agreements with competitors, suppliers and other companies that lead to unlawful restrictions of competition.

5.3 Data protection and confidentiality

Our suppliers comply with the applicable regulations on data protection, confidentiality and information security and ensure that personal data and confidential information are protected as best as possible against data loss, unauthorized access and data misuse through appropriate technical and organizational measures.

5.4 Avoidance of conflicts of interest

Our suppliers require their employees to make decisions on the basis of objective considerations and not to allow themselves to be unduly influenced by personal interests. If conflicts of interest cannot be avoided, they must be handled transparently, openly and professionally.

5.5 Prohibition of corruption and bribery

Our suppliers do not tolerate any form of bribery and corruptibility as well as the acceptance and granting of advantages under German law and comparable prohibitions under the relevant international law. Any form of unauthorized influence in the context of business activities is strictly rejected. No gifts, payments, invitations or services may be offered, promised, demanded, granted or accepted in business transactions that are socially inappropriate and likely to influence the business partner and jeopardize the independence of the business partner. In particular, the supplier shall never directly or indirectly offer or promise a personal or inappropriate advantage, not even in return for preferential treatment of a third party.

5.6 Money laundering prevention

Our suppliers take all necessary measures to ensure that they comply with the legal obligations to combat money laundering, terrorist financing and criminal acts and neither participate in nor facilitate activities in connection with money laundering and terrorist financing.

5.7 International trade

Our suppliers pay strict attention to compliance with all applicable laws for the import and export of goods, services and information and take into account the applicable sanctions and embargo regulations when carrying out their business activities.



6 Review of compliance with the Supplier Code of Conduct

6.1 Compliance with the Supplier Code of Conduct

We reserve the right to review compliance with the aforementioned principles and requirements on a regular or ad hoc basis. In this context, we will first request information from the supplier on compliance with the aforementioned principles and, if necessary, agree other suitable checks with the supplier. The supplier shall provide support to a reasonable extent.

6.2 Agreement to the Supplier Code of Conduct

Our Supplier Code of Conduct is an integral part of our business relationship with suppliers.

6.3 Dealing with violations

In the event of a breach of the principles and requirements of this Supplier Code of Conduct or non-compliance with them, we reserve the right to take appropriate measures, such as

- the supplier's request to remedy the breach or to implement improvement measures
- verification of the remedy of the breach or effectiveness of the improvement measures implemented
- temporary interruption of the business relationship with the supplier, in particular until the breach has been remedied or the improvement measures have been implemented
- termination of the business relationship with the supplier, in particular in the event of serious violations and/or failure to implement improvement measures.



7 Reporting misconduct

If a supplier becomes aware of violations or deviations from this Supplier Code of Conduct in its own company or within the supply chain, these must be reported to Deutsche Leasing AG immediately and corrective measures must be initiated. Our suppliers, their employees or other affected parties can report violations or suspected violations via the whistleblower system set up by Deutsche Leasing AG - confidentially and, if desired, anonymously. The electronic whistleblower system can be accessed via the link:





