

# TK ELEVATOR

# SUPPLIER CODE OF CONDUCT

(TKE SCoC V12.0, October 2026)

## Our understanding of sustainability in supplier management

At TK Elevator (meaning TK Elevator GmbH and all its affiliates), we consider sustainability to be an essential component of our business processes. As a technology group, we purchase raw materials, commodities and services from suppliers worldwide so as to secure the sustainable success of our customers by providing innovative solutions for products and services. This requires responsible management that strives for a long-term, value-added business model. For this reason, our suppliers are an integrated part of our sustainability strategy. In all our procurement activities, we carefully take into consideration a set of economic, process-driven and technical criteria as well as essential social and ecological factors such as human rights, labor conditions, anti-corruption concerns and environmental protection. Irrespective of different products, services, markets, regions or processes, the principal factors for supplier assessment and evaluation at TK Elevator are always cost, quality, reliability, innovation and sustainability. At TK Elevator, we expect that our suppliers will comply with the applicable national statute, with the principles of the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights (UNGP), the principles of the Ethical Trading Initiative (ETI) Base Code, and with the TK Elevator Supplier Code of Conduct. Furthermore, we expect our suppliers to introduce suitable processes within their organizations that support compliance with the applicable statute and that drive continuous improvements regarding the principles and requirements laid out in the TK Elevator Supplier Code of Conduct. This includes implementing a risk-based and transparent due diligence approach to identify, prevent, mitigate monitor and, where necessary, remediate potential adverse impacts related to human and labor rights, health & safety, environmental protection and ethical business practices within their operations and supply chains. Moreover, we expect our suppliers to ensure compliance with these principles and requirements by all their affiliates. For the purposes of this Supplier Code of Conduct, an “affiliated company” shall mean an enterprise in which one of the parties holds a direct or indirect participating interest of more than 50% of the voting registered capital.

## Human and labor rights

At TK Elevator, we expect that our suppliers respect and comply with the fundamental rights granted to all employees under applicable national statute. Furthermore, we expect our suppliers to fully recognize the International Bill of Human Rights and the labor standards issued by the International Labor Organization (ILO), taking into due account the applicable laws and regulations in different countries and at different sites. At TK Elevator, we expect our suppliers to respect third-person rights and to minimize any possible adverse effects by taking into account all relevant international standards.

### **Child labor**

At TK Elevator, we expect our suppliers to prohibit and refrain from any kind of child labor within their organization and their supply chain and to respect minimum age regulations in particular in connection with unhealthy, hazardous, arduous or dangerous workplaces. Suppliers are expected to follow the ILO Minimum Age Convention (No. 138) and the ILO Worst Forms of Child Labor Convention (No. 182).

### **Discrimination**

At TK Elevator, we expect our suppliers to promote equal opportunities and equal treatment. Furthermore, we expect our suppliers to prohibit any form of discrimination in recruiting, compensating, promoting or selecting employees for basic or advanced training programs. Within the organization of our suppliers, no employee may be discriminated against based on gender, age, color, race, ethnic or social origin, nationality, sexual orientation, incapacity, religion or worldview or political opinion, or any other characteristic not related to the individual's qualifications.

### **Respect and dignity**

At TK Elevator, we expect our suppliers to ensure a workplace free from any form of harassment, abuse, intimidation or inhumane treatment. All employees shall be always treated with dignity and respect.

### **Forced labor**

At TK Elevator, we expect our suppliers to prohibit any kind of forced labor or human trafficking in their organization and any contribution to it. This includes, but is not limited to, bonded labor, debt bondage, involuntary servitude or other forms of modern slavery. Suppliers must not hold employees in unlawful or unfair dependency, including through withholding personal documents or imposing recruitment fees.

### **Private or public security forces**

If our suppliers are using private or public security forces in their business activities, we expect them to ensure and control that such security forces always act in accordance with human rights. In particular, suppliers are expected to prevent any violation of the prohibition of torture and cruel, inhumane or degrading treatment, damages life or limb or impairment of the right to organize and the freedom of association.

### **Land, forest, and water rights, and forced eviction**

Suppliers should consider the impact of their business activities on local communities and may not forcibly evict or deprive communities of land, forests or water sources in the acquisition or development of land, forest or water in their business activities. The rights of local indigenous peoples to decent

living conditions, education, employment, social activities, and the right to free, prior, and informed consent (FPIC) to developments that affect them on the lands on which they live, must be respected.

#### **Freedom of association**

At TK Elevator, we expect our suppliers to respect the rights of their employees, to the full extent of applicable national statute, to form a workers' council, collective bargaining unit or other employee representations, and to enter collective bargaining. Exercising the right of association does not justify discrimination, harassment, or suspension of staff.

#### **Remuneration and working time**

At TK Elevator, we expect our suppliers to fully comply with the applicable national statute on working hours, to respect maximum working hours including overtime, and to ensure adequate time and opportunity for recreation and paid leave. Furthermore, we expect that the employees of our suppliers will receive fair remuneration, which is in line with the applicable national standards. Social security is encouraged.

#### **Grievances**

Suppliers are expected to provide their employees with appropriate channels to raise concerns or report potential violations of these principles. Such mechanisms should allow confidential or anonymous reporting to the extent permitted by law and ensure that employees are protected from retaliation.

#### **Conflict Minerals**

At TK Elevator, we expect our suppliers to adhere to all applicable conflict minerals regulations and to apply due diligence in their supplier selection and management, in particular with respect to safe and fair working conditions and the avoidance of cofinancing of civil wars. Suppliers are expected to follow internationally recognized frameworks such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. If a product contains one or more of the so-called conflict minerals (tin, tantalum, tungsten and gold or their ores) we expect our suppliers to provide, on request, transparency on the supply chain up to the smelter and to implement appropriate measures to identify and mitigate associated risks.

TK Elevator reserves the right to request the same level of due diligence for additional minerals.

### **Occupational health and safety**

At TK Elevator, we expect our suppliers to treat health and safety at work with priority and to fully comply with applicable national statutes. To this end our suppliers are expected to establish and maintain an appropriate occupational health and safety management system (e.g., in accordance with ISO45001, or national equivalent). This includes actual as well as potential health and safety risks at work for their own staff as well as for employees of subcontractors working on the supplier's premises or job sites. Moreover, our suppliers are expected to train their employees for the purpose of preventing accidents and occupational diseases as best as possible. Furthermore, suppliers are expected to take into account broader health and safety risks where relevant, such as exposure to hazardous substances, biological agents, and emergency situations, and to continuously improve their health and safety performance.

## Environmental protection

At TK Elevator, we expect our suppliers to comply with all applicable national laws, regulations and standards to protect the environment. Our suppliers are expected to establish and maintain a suitable environmental management system (e.g., in accordance with ISO 14001, or national equivalent) to minimize environmental impact and hazards, and to improve environmental protection in their everyday operations, including actions to manage and reduce consumption of water, energy and materials, generation of waste and emission of greenhouse gases and other pollutants. We encourage our suppliers (non-exhaustive list)

- to report on, track, and monitor greenhouse gas emissions and accurately assess the influence of the organization on this area of the environment
- to actively reduce their carbon footprint, e.g. by using renewable energy, decarbonizing their products, and partnering with their suppliers towards the usage of low-carbon materials,
- to minimize their impact on air, water, and soil quality in their business operations, for example by avoiding any chemical runoff into the ground during their business activities and by properly filtering exhaust gases,
- avoid the usage of hazardous substances (such as e.g. mercury, persistent organic pollutants, ozone depleting substances) as far as possible,
- to reuse existing materials or products and to avoid and/or recycle excess material whenever possible,
- to avoid excess deforestation or land use in their business activities,
- to respect and protect biodiversity and natural habitats.

Suppliers are expected to continuously improve their environmental performance and, where appropriate, take into consideration internationally recognized climate and environmental standards, and participate actively in decarbonization initiatives promoted by TK Elevator.

Furthermore, suppliers are expected to assess relevant environmental and climate-related risks, including climate events, and implement mitigation plans to reduce potential impacts on deliveries and business continuity.

## Conduct in business environment

### **Prohibition of corruption and bribery**

At TK Elevator, we expect our suppliers to have zero-tolerance for corruption and to ensure compliance with all United Nations (UN) and Organization for Economic Co-operation and Development (OECD) conventions against corruption, and with all governing anti-corruption laws. In particular, our suppliers are expected to ensure that their employees, subcontractors and agents do not offer, promise or grant any advantages to any TK Elevator employees or related parties with the goal of securing an order award or any other form of preferential treatment in their business transactions.

### **Invitations and gifts**

At TK Elevator, we expect that our suppliers will refrain from presenting any invitations or gifts to our employees so as to gain any form of influence. Any invitations or gifts extended to TK Elevator employees or related parties, if any, must be reasonable and suitable with a view to scope and design, i.e. they must be of low financial value and reflect ordinary local business customs. We also expect our suppliers to refrain from asking TK Elevator employees or related parties for any inappropriate advantages.

### **Preventing conflicts of interest**

In our suppliers' business dealings with us, we expect our suppliers to take decisions based on objective criteria only. Any factors that might influence our suppliers' decisions due to private, business or other conflicts of interest must be prevented from the start. The same applies to relatives and other related parties.

### **Unrestricted competition**

At TK Elevator, we expect our suppliers to always compete in a fair manner and to comply with applicable antitrust laws and regulations. Our suppliers are expected not to enter into agreements with competitors that might constitute a breach of antitrust law, nor to take advantage of any dominant market position they might hold.

### **Money laundering**

At TK Elevator, we expect our suppliers to comply with all applicable statutes governing the prevention of money laundering, and not to participate in any money laundering activities.

### **Export controls and economic sanctions**

Suppliers need to adhere to any applicable restrictions or sanctions on the export of goods or services, as well as to any applicable restrictions on trade with certain countries, regions, companies, entities or individuals.

### **Financial responsibility**

Suppliers must accurately record, maintain and report business documentation, including financial and quality reports in accordance with applicable law and generally accepted accounting principles.

### **Confidentiality, privacy, intellectual property, and data security**

Sensitive data such as TKE business or technology information or personal-related data must be treated as confidential. The intellectual property of TKE and third parties must be respected. We expect effective state-of-the-art data protection processes and adherence to applicable regulations.

## Supplier relations

At TK Elevator, we expect our suppliers to communicate the principles laid out herein to their subcontractors and subsuppliers and to take these principles into account when selecting, contracting, and managing subcontractors and subsuppliers. Our suppliers are expected to encourage their subcontractors and subsuppliers to comply with the minimum standards of this Code of Conduct regarding the protection of human rights, working conditions, anti-corruption and environmental protection when fulfilling their contractual obligations. Further we expect from our suppliers to only source material from legal sources and if requested to provide evidence on the legal source.

## Compliance with the TK Elevator Supplier Code of Conduct

We will review our suppliers' compliance with the principles and requirements laid out in the TK Elevator Supplier Code of Conduct and expect immediate comprehensive response in case TKE Elevator raises reasonable concerns. We may also ask our suppliers to complete self-assessments as required to comply with applicable legislation and to support our sustainability roadmap. Furthermore, we reserve the right to consult with each supplier and to either perform a sustainability audit at the supplier's site or to appoint a qualified third party to conduct the audit. In the event that such a sustainability audit is performed by a third party, the supplier shall bear all costs and expense for this audit if the annual turnover of the supplier with TK Elevator exceeds 100,000 Euros. The audit cost should usually not exceed a limit of 5,000 Euros. TK Elevator will receive a full report on the audit findings and expects the mitigation of non-conformities.

In the event that the supplier detects severe violation against the TKE Supplier Code of Conduct in its own organization, the supplier is requested to immediately inform TK Elevator, providing clear report of the identified misconduct along with short-term mitigation and long-term improvement measures. Open cooperation with the local authorities is a must.

If TKE suspects a supplier of violating any of the principles or requirements laid out in the TK Elevator Supplier Code of Conduct (e.g. based on negative media reports), TK Elevator reserves the right to request from the supplier that all relevant information be disclosed. In the event that a supplier evidently fails to fulfill any of the principles or requirements set out in this TK Elevator Supplier Code of Conduct or refuses to pursue and implement measures for improving his sustainability performance, after having been given a reasonable period of grace, the supplier will be considered as seriously violating his contractual obligation towards TKE Elevator. TK Elevator reserves the right to immediately terminate any or all contracts with the supplier for cause.

By signature supplier confirms to acknowledge and adhere to the principles and provisions laid out in this document:

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|--------------------------|-------------------|-------------------------------------------------|------------------|
| Company name and address | Location and date | Name and function of signatory in block letters | Signature        |
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