

# CODE OF CONDUCT FOR SUPPLIERS AND SERVICE PROVIDERS OF THE AURELIUS GROUP

## INTRODUCTION

**The AURELIUS Group is a pan-European investment group with offices in Munich, London, Stockholm and Madrid. Since it was founded in 2006, AURELIUS has grown from a local turnaround investor to an international multi-asset manager.**

AURELIUS Equity Opportunities SE & Co. KGaA (ISIN: DE000A0JK2A8, ticker symbol: AR4) represents the listed entity within the AURELIUS Group that focuses on investing in special and turnaround situations and mid-market transaction opportunities in a broad range of industries. The AURELIUS Group also operates in the areas of growth capital, real estate opportunities and debt opportunities. AURELIUS Growth Capital invests in successor solutions and spin-offs from larger mid-sized companies and corporate groups. AURELIUS Real Estate Opportunities focuses on real estate investments, particularly in projects with operational improvement potential, the value and income of which can be increased in the long term by means of active management. AURELIUS Debt Opportunities provides capital to British companies in the form of alternative financing vehicles.

With its group charity AURELIUS Refugee Initiative e.V., AURELIUS provides comprehensive support for refugees on their way towards a better life.

## Essential elements of ethical, social and ecological responsibility at AURELIUS

AURELIUS incorporates ethical, social and ecological considerations into its business strategy. It is essential for our long-term business success that we perform our business activities in a responsible way. AURELIUS observes the ten principles of the UN Global Compact, the world's biggest initiative for sustainable corporate governance. The Global Compact of the United Nations calls upon commercial enterprises to align their strategies and business activities with globally valid principles of human rights and labor rights and environment protection, and to combat all forms of corruption.

These principles encompass the minimum standards for all suppliers of the AURELIUS Group that are defined in this Code of Conduct for Suppliers. AURELIUS requires all its group companies to implement these principles appropriately. The goal is to continuously improve the entire procurement process, quality, environmental sustainability and productivity in close collaboration with suppliers.

## Our principles for suppliers and service providers

### **(1) Human rights**

#### **(a) Child labor**

Child labor is strictly prohibited. "Child" refers to any person younger than the statutory minimum age for employment in the country in which the activity is performed, provided that the statutory age is not younger than the minimum age defined by the International Labor Organization (ILO). Naturally, our suppliers are obligated to comply with nationally applicable laws and regulations for the protection of children and young people.

#### **(b) Forced labor**

All forms of forced labor are strictly prohibited.

Suppliers may not compel anyone to work or enter into an employment relationship by force or intimidation (e.g. bonded labor or slavery).

As part of this prohibition, suppliers may also not force anyone to continue working by withholding pay, employee benefits, property or documents. Suppliers are also obligated to comply with laws and regulations prohibiting human trafficking and comply with all locally applicable laws in the country or countries in which they operate.

**(c) Freedom of association**

Suppliers shall grant their employees the right of association in order to protect or represent their interests in accordance with the applicable national laws. Employees may form or join an association for this purpose.

**2) Working conditions**

**(a) Working hours**

The number of weekly working hours may not exceed the maximum number prescribed by the applicable national laws and industry standards.

Furthermore, weekly working hours may not exceed 60 hours, including overtime hours, and employees must be granted at least one day off in every seven-day week. Temporary exceptions are permitted in case of emergencies and extraordinary circumstances.

**(b) Health and safety**

Suppliers must implement appropriate systems, processes and/or measures in their organizations to ensure compliance with national occupational health and safety laws.

Occupational safety measures and procedures must be implemented to actively prevent accidents and health damage. This also encompasses the obligation to regularly inform employees about risks and train them by means of occupational safety exercises, for example, and provide appropriate personal protective gear. Furthermore, it must be assured that the work place and work environment, including common areas and employee accommodations, meet the applicable hygiene standards.

**(c) Appropriate compensation**

Suppliers are obligated to pay appropriate compensation to their employees. The paid compensation must comply with all applicable national laws on compensation, including minimum wage laws, overtime laws and legally prescribed employee benefits.

Employees must receive their compensation regularly, completely and punctually. The compensation must enable employees to participate in social, cultural and political life.

**(d) Non-discrimination**

Der Lieferant darf Beschäftigte und Bewerber keiner Diskriminierung aufgrund von ethnischer oder nationaler Herkunft, Suppliers may not expose employees and potential employees to discrimination on the basis of ethnic or national background, caste, religion, age, physical or mental disability, sex, family status, sexual orientation, religious or political conviction, other personal characteristics or membership in employee organizations.

**(e) Abuse and harassment**

Employees are to be treated with dignity and respect.

Under no circumstances may employees be exposed to or threatened with physical, psychological or verbal harassment or other abusive behavior. This also includes sexual harassment, sexual abuse and psychological abuse.

### **(3) Environmental protection**

Suppliers must comply with the applicable national environmental protection laws and regulations. In any case, environmental pollution must be avoided or reduced as much as possible by using environmentally friendly technologies, for example. The protection of the environment should be continuously improved, energy consumption optimized and natural resources conserved. Employees must be instructed on how to avoid environmental risks.

### **(4) Business ethics**

#### **(a) Legal compliance**

Suppliers are obligated to comply with all applicable laws and regulations of the countries in which they perform business activities or provide services.

#### **(b) Anti-corruption laws and unlawful payments**

Suppliers must comply with the anti-corruption laws, provisions and regulations of each country in which they perform business activities and seek to prevent and detect corruption in all business agreements with due care.

Suppliers may not offer or accept unlawful payments or in-kind donations to or from customers, suppliers, agents, government representatives, political parties, candidates for public office or other persons. This particularly includes payments to speed up or ensure the performance of routine government activities if such payments violate local law.

#### **(c) Fair competition and anti-cartel law**

Suppliers must observe the principles of fair competition. They are also expected to comply with applicable anti-cartel laws and regulations.

#### **(d) Conflicts of interest**

Suppliers must avoid all conflicts of interest and similar situations. Decisions must be made solely on the basis of objective business criteria and not under the influence of personal interests.

#### **(e) Confidential information and intellectual property**

Business secrets and personal information must be adequately and properly used and protected.

Intellectual property rights must be respected. Suppliers must comply with all applicable laws for the protection of intellectual property. These include patents, copyrights and trademarks, as well as protection against disclosure.

#### **(f) Imports and exports**

The applicable laws and regulations in the area of export and import controls and customs must be observed.