



# SUPPLIER CODE OF CONDUCT

Business all around the globe is very promising but conducting our business with high standards of ethics and integrity when dealing with our employees, customers and business partners is our top priority. This doesn't mean just complying with the laws and regulations; it also means leading by example in the way that we do business and in the way that we behave.

As a world's leading supplier in the vacuum industry we purchase raw materials, commodities and services from suppliers worldwide to provide quality, reliability and advanced technological solutions. It is our firm conviction that sustainable economic success is inseparable from compliance with laws and our internal standards, particularly where human rights, health and safety at work, environmental protection and combatting corruption are concerned.

Our requirements are based on the international principles of the "Global Compact" and the "Universal Declaration of Human Rights" of the United Nations and the labor standards issued by the International Labor Organization, taking into due account the applicable laws and regulations in different countries and at different sites. They are supplemented by our internal standards and core values.

We expect our suppliers to fully comply with the principles laid out in the following Supplier Code of Conduct of Pfeiffer Vacuum.

## **I. Laws and labor standards**

### **Child labor**

Child labor is forbidden. The supplier has to observe the minimum age for permission to work according to the national regulations. The supplier also must not purchase materials or services from companies using child labor.

### **Forced labor**

The supplier must not participate in human trafficking, or use forced, involuntary or slave labor. It is furthermore prohibited to purchase materials or services from companies using forced, involuntary or slave labor. The supplier must be able to confirm that materials included in their products comply with all labor and human laws of the country in which they do business.

### **Discrimination**

Equal opportunities and equal treatment for all employees is expected from the supplier. It shall be refrained from engaging in any kind of discrimination based on gender, ethnicity, age, nationality, disability, sexual orientation, religion and any other characteristic protected under international or local law.

### **Employment protection**

We expect our suppliers to strive to implement the principles of occupational health and safety at a high level. The supplier shall comply with the applicable occupational health and safety provisions

and ensure a safe and healthy working environment, in order to maintain employees' health and avoid any accidents, injuries or work-related illnesses.

### **Freedom of association**

The supplier has to respect the right of its employees, to the full extent of applicable national law, to form and enter into a workers council, collective bargaining unit or other employee representations.

### **Remuneration and working hours**

The supplier shall comply with the respective national laws and provisions on working hours, wages and salaries and employer's contributions.

## **II. Business ethics**

### **Business Integrity**

The supplier shall meet international anti-corruption standards and local anti-corruption and anti-bribery laws. The supplier shall in particular refrain from offering employees of Pfeiffer Vacuum any services, gifts or benefits (either directly or indirectly) that could appear to influence their decisions on sourcing and contracting issues. This also includes gifts of nominal value. Although giving gifts is acceptable in some cultures, Pfeiffer Vacuum requests that suppliers respect the company's policy.

### **Conflict of interest prevention**

In its supplier's business dealing, Pfeiffer Vacuum expects the supplier to take decisions based on objective criteria only. Therefore the supplier shall adhere to all applicable laws regarding conflicts of interest and make every effort to recognize, disclose, and mitigate possible personal conflicts of interest within the scope of the supplier's working relationship with Pfeiffer Vacuum and Pfeiffer Vacuum's employees.

### **Fair competition**

The supplier shall comply with competition and anti-trust laws applicable in its country. In this regard, abuses of dominant position, concerted practices or unlawful agreements, as well as exchange of pricing information between competitors are to be prohibited.

### **Responsible Sourcing of Minerals**

The supplier shall comply with applicable laws and regulations regarding conflict minerals such as tin, tungsten, tantalum and gold. The supplier shall ensure that products supplied to Pfeiffer Vacuum do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups.

### **Money laundering**

The supplier has to comply with all applicable laws governing the prevention of money laundering and terrorism financing and does not participate in these activities.

### **Import and Export Controls**

The supplier shall comply with all valid and applicable laws when importing and exporting goods and services.

### **Protection of personal data and intellectual property**

According to data protection regulations applicable, the supplier shall safeguard and make only appropriate use of confidential and personal information collected from/regarding Pfeiffer Vacuum. The supplier shall ensure that all employee's and business partners' privacy is protected.

The supplier shall respect intellectual property rights. The transfer of technology and know-how is to be done in a manner that protects intellectual property rights and customer and supplier information is to be safeguarded.

### **Confidentiality**

The supplier shall properly handle sensitive information received from Pfeiffer Vacuum. This information shall not be used for any purpose other than the business purpose for which it was provided.

### **Environmental protection**

The supplier shall adhere to any applicable environmental laws, provisions and standards. It is furthermore expected that the supplier develops and uses an efficient environmental management system (e.g. their own written policy, ISO 14001 or other standards), in order to identify and minimize the environmental impact and hazards. In this respect, we expect the supplier to make reasonable provision for protection of the environment in its own business activities.

## **III. Complying with the Supplier Code of Conduct**

### **Dialog with business partners**

The supplier has to ensure that all their employees, suppliers and sub-contractors are not only aware of this Supplier Code of Conduct, but are also committed to uphold the principles set above. The supplier is expected to impart the principles specified in the Supplier Code of Conduct to its sub-contractors and other business partners who are involved in delivering products and services described in the principal agreement with Pfeiffer Vacuum. The supplier shall, in addition, encourage such parties to take these standards as a basis for their actions.

### **Compliance with the Supplier Code of Conduct**

Upon giving reasonable prior notice, Pfeiffer Vacuum reserves the right to check adherence to the requirements of the Supplier Code of Conduct. Pfeiffer Vacuum encourages its suppliers to introduce their own binding guidelines for ethical conduct. The supplier shall encourage its own suppliers to adhere to the human rights, occupational safety, ethical standards and environmental standards forming the basis for this agreement within the scope of fulfilling their contractual obligations. The supplier shall be responsible for its own supply chain. Any violation of the obligations specified in the Supplier Code of Conduct shall be deemed a material contractual infringement by the supplier.

### **Deployment of sub-contractors**

This Supplier Code of Conduct shall likewise apply in full to all sub-contractors of the supplier who provide goods or services to the supplier. The supplier shall be independently responsible for ensuring compliance by each of such sub-contractors, and in fact in the same scope in which it ensures adherence to this code for itself. Pfeiffer Vacuum reserves the right to verify adherence to the Supplier Code of Conduct by the supplier's sub-contractors, and, if necessary, the supplier shall permit Pfeiffer Vacuum to conduct an audit in this respect.

### **Violation of the Code of Conduct**

Compliance with these guidelines is seen as the basis of a good, constructive and professional working relationship between the parties. In the case of violation of the present Pfeiffer Vacuum Supplier Code of Conduct by the supplier, Pfeiffer Vacuum shall request the supplier to present an action plan for subsequent improvement without delay, which provides for eliminating the cause of the violation within a fixed period of time. Such plan is to be set out in writing, and approved by Pfeiffer Vacuum. In addition, Pfeiffer Vacuum reserves the right to trigger the termination of existing agreements for good cause.

**Pfeiffer Vacuum Group  
Supplier Code of Conduct  
Acknowledgement**

We would like to ask you to acknowledge the attached Supplier Code of Conduct of the Pfeiffer Vacuum Group.

<b>Supplier data</b>				
Supplier's name:		Supplier number:		
Address:				
ZIP Code:		City:		Country:
<b>Contact</b>				
Employee in charge:				
Telephone:				
E-mail:				

  
Place, Date

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Signature