

# Supplier Code of Conduct

## Global Rules for Suppliers & Business Partners

The Supplier Code of Conduct creates a clear framework of values and principles that support and underpin the meaning of fair competition and a principled approach to doing business.



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## Guiding Principle

The provisions of the Code of Conduct set forth the expectations of Mounting Systems to all its Suppliers. Our Suppliers' business and labor practices must comply with all applicable laws, as well as the requirements and principles of this Supplier Code of Conduct. These principles extend also to our Suppliers' parent entities and subsidiaries or affiliate entities. Mounting Systems expects that Suppliers ensure that this Code of Conduct is communicated clearly and accurately to all their employees and Suppliers, and that it is done in the local language.

Our Suppliers must comply with the standards of this Code even when this Supplier Code of Conduct exceeds the requirements of applicable law. For the avoidance of doubt, Mounting Systems expects that all suppliers will adhere to all local rules of their countries, which go beyond the requirements set forth herein.

## Child Labor

Mounting Systems will not tolerate the use of child labor. Our Suppliers must observe the rights set forth in the International Conventions of the Rights of the Child <sup>1</sup>. The minimum admission to employment or work shall not be less than the age of completion of compulsory education, in any case not less than 15 years old. This minimum age of employment is based on several conventions of the International Labor Organization (ILO) (2). Moreover, young workers under the age of 18, must be protected from performing any work that it is likely to be hazardous or to interfere with their education or that may be harmful to their health, physical, social, mental or spiritual development.

<sup>1</sup> Source ILO: No138, 182; UN Principle 5;

<sup>2</sup> ILO No: 29, 105; UN principal 4; UK Modern Slavery Act Section 54, part 6;

<sup>3</sup> ILO No 111, UN Principle 6; 3

## Involuntary or Forced Labor and Harassment

Forced labor is prohibited in all forms <sup>2</sup>. Our Suppliers must treat all their employees with dignity and respect and not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. No harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated.

## Human Trafficking and Modern Slavery

Our Suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. Working must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice.

Our Suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working, and our Suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing. Workers must be given clear, understandable contracts regarding the term and conditions of their engagement in a language understood by them.

## Anti-discrimination

Our Suppliers must not discriminate on the basis of race, color, national origin, gender, sexual orientation, religion, disability, age, political opinion, pregnancy, marital or family status, or similar factors in hiring and working practices such as job applications, promotions, job assignments, training, wages, benefits, and termination <sup>3</sup>. Conditions of working must be based on an individual's ability to do the job, not on personal characteristics or beliefs. Suppliers must not subject workers or applicants to medical tests that could be used in a discriminatory manner.

## Wages and Benefits

Our Suppliers must pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws regarding minimum wages and social benefits. If the statutory minimum wage do not cover the cost of living, the supplier shall be requested to pay its employees an appropriate wage that covers these basic needs. Deductions from wages as a punitive measure are not permitted.

## Working Hours

Except in unusual or emergency situations, (i) Suppliers must not require a worker to work more than 60 hours per week, including overtime, and (ii) each worker must be entitled to at least one day off for every seven-day work period <sup>4</sup>. In all circumstances, working hours must not exceed the maximum amount permitted by law.

## Immigration Compliance

Our Suppliers may only engage workers who have a legal right to work. If Suppliers engage foreign or migrant workers, such workers must be engaged in full compliance with the immigration and labor laws of the host country.

## Freedom of Association and Collective Bargaining

Our Suppliers must respect the rights of workers to establish and join a legal organization of their own selection <sup>5</sup>. Workers must not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such legal organizations. The employees involved must not be discriminated by the supplier.

<sup>4</sup> ILO 1, 14, 26, 131

<sup>5</sup> ILO No. 87, 98

## Occupational Safety and Health

Our Suppliers must provide a safe and healthy work environment, and Suppliers must, at a minimum, comply with applicable laws regarding working conditions and with the standards below.

### Occupational Safety.

Our Suppliers must educate workers on safety procedures and also control worker exposure to potential physical safety hazards by implementing physical guards, barriers, and/or engineering and administrative controls. Workers must be informed and receive appropriate education in advance if they will be working with (or otherwise exposed to) hazardous or dangerous conditions or materials. In addition, workers must be given appropriate personal protective equipment and educated and trained on the proper use of such equipment. Our Suppliers must manage, track, and report occupational injuries and illnesses.

### Emergency Preparedness and Response.

Our Suppliers must identify and plan for emergency situations and implement and train their workers on response systems, including emergency reporting, alarm systems, worker notification and evacuation procedures, worker training and drills, first-aid supplies, fire detection and suppression equipment, and unblocked exit facilities.

### Machine Safeguarding.

Suppliers must implement a regular machinery maintenance program. Production and other machinery must be routinely evaluated for safety hazards.

### Material Safety.

Material safety data sheets containing all necessary safety-relevant information will be made available by Suppliers for all hazardous substances and will be provided to Mounting Systems GmbH or its affiliate Companies in case of a legitimate need. Our Suppliers must address product-related issues and their potential impact during all stages of the production process; safety management is a minimum requirement.

## **Environmental protection**

Mounting Systems is a company striving to protect the environment and expects from its Suppliers to comply with all applicable environmental laws. Mounting Systems encourages our Suppliers to implement systems that are designed to minimize the impact on the environment by the supply chain system, the production process, and the products themselves. It is expected that environmental pollution will be minimized and that environmental protection measures will be continuously improved.

### **Environmental Permits and Recordkeeping.**

Suppliers must obtain and keep current all required environmental permits, approvals, and registrations and follow applicable operational and reporting requirements.

### **Effective Management and Disposal of Hazardous Substances.**

Suppliers must effectively identify and manage the safe handling, movement, storage, and disposal of chemicals and other substances that pose a threat to the environment, including providing workers with appropriate training on the safe-handling and disposal of hazardous substances. Suppliers must also monitor and control wastewater or solid waste generated from operations before disposing in accordance with applicable laws. In addition, Suppliers must characterize, monitor, control, and treat regulated air emissions before discharging in accordance with applicable laws. Pollution that has a negative effect on human health and / or the environment and the climate must be handled, measured and controlled appropriately and must be minimized or eliminated.

### **Quality and Product safety.**

Suppliers must comply with all generally recognized or legally agreed quality requirements for their products in order to provide goods and services that consistently meet Mounting Systems needs, performed as warranted and are safe for their intended use. Our Supplier are required to provide Mounting Systems with material safety datasheets and all safety-related information when requested.

## **Ethical Behavior**

Mounting Systems expects its Suppliers to adhere to the highest standard of moral and ethical conduct, to respect local laws and not to engage in any form of corrupt practices, including extortion, fraud, or bribery, at a minimum. Fair business arrangements and the recognition of anti-trust laws are also mandatory.

### **No Bribery**

Our Suppliers must not offer nor accept bribes or other means of obtaining undue or improper advantages to anyone for any reason, whether in dealings with governments or the private sector.

### **Anti-Corruption.**

Suppliers must comply with applicable anti-corruption laws, including the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act, and not offer anything of value, either directly or indirectly, to government officials in order to obtain or retain business.

## **Management Systems**

Suppliers must adopt a management system to ensure compliance with applicable laws and this Code of Conduct and to facilitate continuous improvement.

### **Management Accountability and Responsibility**

Senior management must routinely review and assess the quality and efficiency of the management systems and programs. Mounting Systems also expects our Suppliers to hold their Suppliers and subcontractors to the standards and practices covered by this Code.

### **Risk Management.**

Suppliers must establish a process to identify the environmental, health, safety, and ethical risks associated with their operational and labor practices. In addition, management must develop appropriate processes to control identified risks and ensure regulatory compliance.

**Documentation and Records.**

Suppliers must create, retain, and dispose of business records in full compliance with applicable legal requirements along with appropriate confidentiality to protect privacy.

**Supplier's Corrective actions.**

Suppliers' compliance with this Supplier Code is subject to Mounting Systems' review, including third-party auditing of work and conducting confidential worker interviews. Suppliers must provide prompt access to their facilities and workers during any audit. We require Suppliers to promptly provide a detailed remediation plan and take corrective actions for deviations from this Supplier Code, and Mounting Systems will track Suppliers' remediation efforts. Mounting Systems may (without liability) terminate its relationships with any supplier found to be in violation of this Code of Conduct, including for denying prompt access to their premises.

**Suppliers' commitment**

In order to ensure that this document is seen as a formal support to Mounting Systems Code of Conduct and as an agreement from your side, we would appreciate to return this form signed once signed by relevant authority of your organization.

Date, Place

Confirmed by

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