



Document Type:	AMG Policy	Classification:	Public
Title:	Supplier Code of Conduct	Publication date:	August 2024
Department:	Purchasing		
Policy Owner:	Chief Compliance Officer/ Head HSE/ Head Social Impact		Page: 1 of 5

SUPPLIER CODE OF CONDUCT

1. PURPOSE

AMG and its group companies (**“AMG”**) are operating in a global market. Our supplier relationships are essential in building economic value and promoting social and environmental best practices. AMG is committed to conducting its business ethically, sustainably, and responsibly.

Our core Values – safety, value creation, respect, integrity and enabling CO₂ reduction – form the basis how we conduct our operations and how we deal with our employees, business partners and stakeholders. Our Supplier Code of Conduct (**“Supplier Code”**) sets out our expectations for Suppliers in the areas of amongst others business integrity and anti-corruption, human rights, health and safety and environmental management.

AMG engages with its Suppliers respectfully and ethically. It selects Suppliers based on specifications, price, quality, service level and technology, and the principles outlined in this Supplier Code.

2. SCOPE AND APPLICABILITY

This Supplier Code applies to all suppliers, vendors, contractors, including temporary workers, consultants, agents and other providers of goods and services who do business with or on behalf of one of group entities that are part of the AMG Group (**“Suppliers”**).

3. ROLES AND RESPONSIBILITIES

- The Management Board has adopted this Supplier Code and is accountable for its implementation. It shall review this Supplier Code and the implementation of this Supplier Code regularly in consultation with the Supervisory Board.
- Suppliers are expected to meet and comply with the supplier principles (**“Principles”**) set out in this Supplier Code and are expected to communicate and apply the Principles throughout their own supply chain.
- AMG’s group companies manage the contractual relations with their Suppliers in accordance with local, state, national and international laws and regulations and by adhering to this Supplier Code.

4. PRINCIPLES

AMG expects its Suppliers to conduct their business responsibly, with integrity, honesty and transparency and to adhere to the following Principles:



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Policy Owner:	Chief Compliance Officer/ Head HSE/ Head Social Impact		Page: 2 of 5

4.1 Applicable regulations and international standards

AMG expects its Suppliers to:

- be aware and comply with all applicable laws and regulations of the countries of their operation; and
- adhere to relevant international standards, such as UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, and OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

4.2 Confidentiality and Privacy

AMG expects its Suppliers to:

- maintain the confidentiality of all of AMG's and its partners' confidential information; and
- take all reasonable and necessary precautions to safeguard AMG's and its partners' information to which it and its employees have access; and
- comply with all (local and international) applicable privacy and data protection legislation.

4.3 Human rights

AMG expects its Suppliers to respect human rights in line with international standards, including:

- to respect internationally recognized human rights;
- to support the abolition of all kinds of child labor;
- to oppose the use of forced or unlawful compulsory labor and to abide by modern anti-slavery legislation and reject any form of human trafficking;
- to uphold the freedom of association and the effective recognition of the right to collective bargaining;
- to commit to a workplace free of harassment and abuse and to support eliminating discrimination regarding employment and occupation; and
- to make employment decisions solely based on qualifications, skills, performance and experience.

4.4 Conflict minerals

Suppliers are expected to adhere to local and international regulations and standards concerning the sourcing and supply from materials originating from conflict or high-risk areas.

4.5 Health and safety

AMG expects its Suppliers to foster a safe and healthy working environment and to:

- have established internal programs to protect the health and safety of their staff, subcontractors and residents, through a documented safety management system and related incidence



Document Type:	AMG Policy	Classification:	Public
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Department:	Purchasing		
Policy Owner:	Chief Compliance Officer/ Head HSE/ Head Social Impact		Page: 3 of 5

reporting, preventive actions and risk assessments that identify hazards and assess and control risk related to their specific activity;

- maintain emergency plans to minimize harm to life, environment, and property;
- comply with applicable laws governing work hours and overtime; and
- provide access to safe drinking water, sanitation and hygiene at the workplace, including adequate restrooms and handwashing facilities; fire exits and essential fire safety equipment and access to emergency response services.

4.6 Environment

AMG expects its Suppliers to:

- promote environmental responsibility in line with prevailing environmental standards, including responsible use of energy and water;
- promote circularity, to minimize and responsibly dispose of or recycle hazardous and non-hazardous waste;
- establish greenhouse gas emissions monitoring systems, and reduction targets and plans. of its own operations as well as - in due time - its scope 3 greenhouse gas emissions; and
- have procedures in place to identify environmental impacts, prevent environmental incidents and have response plans to mitigate the effects should such an incident occur, through a documented environmental management system.

4.7 Communities

AMG Suppliers are encouraged to maintain and foster social and economic development and contribute to the sustainability of the host communities, including indigenous communities if applicable right to free, prior, and informed consent, in which they operate. AMG suppliers are expected to:

- treat members of the host community in a transparent way with dignity and respect; and
- have zero tolerance for threatening behavior, violence, coercion, sexual exploitation or abuse of members of communities;
- engage with local communities to understand and address their perspectives on (the development of) local operations, fostering transparent planning and communication, striving for mutual agreement on how to achieve sustainable local development.

4.8 Anti-corruption and anti-competition

AMG expects its Suppliers to compete fairly and to:

- not tolerate corruption in any of its forms, including extortion and bribery, with customers, suppliers, government officials or other third parties;



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Department:	Purchasing		
Policy Owner:	Chief Compliance Officer/ Head HSE/ Head Social Impact		Page: 4 of 5

- not offer or promise or give anything of value to any public official or any person or entity in the private or commercial sector, directly or indirectly, to influence them in their work or in an attempt to obtain or retain business or a business advantage or a personal benefit;
- not offer anything of value to AMG employees that could inappropriately influence AMG's business decision or gain an unfair advantage;
- disclose any form of conflict of interest concerning the procurement process with AMG;
- to uphold high standards of personal and business ethics;
- not engage in any behavior that effects fair competition, e.g., not to discuss a company's current or future pricing, not to share price or cost information.

4.9 Compliance and transparency

AMG expects its Suppliers:

- to maintain accurate financial books and business records, including with respect to all invoices submitted to AMG for payment or reimbursement, in line with generally accepted accounting principles in the respective jurisdictions in which the supplier operates;
- to deliver products and services that meet applicable quality and safety standards;
- to comply with this Supplier Code by establishing appropriate risk and opportunity management processes to assess impacts of their activities and provide effective remedy when requested by AMG;
- to respond promptly to AMG's reasonable inquiries concerning compliance with this Supplier Code;
- direct its employees to use AMG's Speak Up & Reporting procedure as published on its website in case that is needed;
- to timely respond to requests for data from AMG in view of evolving national and international ESG reporting standards, which, amongst others, require AMG to report its scope 2 greenhouse gas emissions and possibly in the future its scope 3 greenhouse gas emissions, and;
to acknowledge and participate in AMG's supplier engagement initiatives, whether conducted online, on-site, or off-site, to enhance performance in alignment with this Supplier Code.
- to respect all appropriate export control and economic sanctions laws and regulations of all relevant countries. No Supplier shall knowingly or through willful ignorance sell, export, re-export or deliver prohibited goods, software, services and technology to certain restricted destinations, entities and/or individuals.

5. COMPLIANCE AND ACKNOWLEDGEMENT

Suppliers are required to acknowledge that they have received, read and understood the Supplier Code. Suppliers are expected to inform AMG without delay of any non-compliance by Supplier with any of the Principles set forth herein. In such case or in the event AMG discovers such non-



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Department:	Purchasing		
Policy Owner:	Chief Compliance Officer/ Head HSE/ Head Social Impact		Page: 5 of 5

compliance by Supplier, Supplier shall make himself available to discuss and agree with AMG appropriate remedial actions by Supplier.

6. AMG REFERENCE POLICIES

Other AMG policies and AMG documents that are related to the topic of this Policy are, amongst others:

- AMG Business Code of Conduct
- AMG Human Rights Policy
- AMG Health and Safety Policy
- AMG Environmental Policy
- AMG Anti-Bribery, anti-corruption and conflict of interest Policy
- AMG Speak Up & Reporting Policy
