



VARTA Supplier Code of Conduct

At VARTA AG and its affiliated companies ("VARTA"), we respect human rights and have committed ourselves to promoting them in our own business area, in our business relationships and beyond. In doing so, we refer to international standards and work according to generally accepted guidelines. We have anchored these principles in our internal [Code of Conduct](#). In our own business area, we incorporate these values both in our operating business and in extraordinary activities, such as construction projects.

We focused on sustainability-related issues primarily concerning mineral supply chains. These include minerals such as aluminium, cobalt, copper, gold, graphite, lithium, manganese, nickel, tantalum, tin, tungsten, and zinc.

We expect our values to be supported and upheld by our business partners as well as their business partners and would like to work with them towards this objective. VARTA's business activities focus on our business partners (particularly customers, sales partners, suppliers, and service providers).

Affiliated companies of VARTA AG mean all companies which are indirectly or directly controlled by VARTA AG, such as, but not limited to:

VARTA Consumer Batteries GmbH & Co. KGaA located in Ellwangen/Germany and Dischingen, Germany,

VARTA Microbattery GmbH located in Ellwangen /Germany,

VARTA Storage GmbH located in Nördlingen / Germany,

VARTA Micro Production GmbH located in Nördlingen / Germany,

VARTA Microbattery S.r.l, located in Brasov / Romania,

P.T. VARTA Microbattery, located in Singapore / Singapore,

EMEA Consumer Batteries (Shenzhen) Co. Ltd. in Shenzhen/ China.

This VARTA Supplier Code of Conduct, as well as its applicable documents are based on the following international frameworks:

- [Gender Dimensions of the United Nations \(UN\) Guiding Principles on Business and Human Rights](#)
- [International Labour Organization Conventions and Recommendations](#)
- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#)
- [UN Children's Rights and Business Principles](#)
- [UN Declaration on the Rights of Indigenous Peoples](#)
- [UN Global Compact](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [UN Sustainable Development Goals](#)
- [UN Universal Declaration of Human Rights](#)



Membership of amfori BSCI

VARTA is a member of amfori BSCI and equally requests suppliers to fully agree on the amfori BSCI Code of Conduct by signing this document. The currently valid amfori BSCI Code of Conduct can be downloaded from the [amfori BSCI Resource Library](#).

In addition, the signatories at particular sustainability-related risk commit to be regularly audited by a third party for compliance with social standards and commit to aim for continuous improvement of such. Costs for such measures need to be carried by the supplier.

Respect for human rights

The signatories will procure their products especially minerals from conflict-affected and high-risk areas in accordance with this VARTA Supplier Code of Conduct and will neither tolerate nor profit from, contribute to, assist with or facilitate the commission of:

- any form of torture, cruel, inhuman and degrading treatment;
- any form of slavery, and forced or compulsory labour;
- any form of child labour;
- other serious human rights violations and abuses, such as sexual violence;
- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Protecting the rights of women, indigenous peoples, minorities and disadvantaged groups are a major concern to us. Employees who are particularly in need of protection include pregnant women, people with disabilities and young people under 18.

Rights of indigenous peoples

The signatories respect the prohibition of unlawful eviction and the prohibition of the unlawful deprivation of land, forests, and waters in the acquisition, construction, or other use of land, forests, and waters, the use of which secures the livelihood of a person.

The signatories do not tolerate any negative impact of indigenous peoples' and affected communities' rights at the mine, transport, trading or processor level of the supply chain. In particular, the claims of ILO Convention 169 on indigenous peoples and the right to consultation and free, prior and informed consent (FPIC) must be respected and supported.

Direct or indirect support to non-state armed groups and security forces

The signatories respect the prohibition of human rights violations carried out by private or public security forces to protect the corporate project, due to lack of instruction or control on the part of the company.

The signatories will also not provide or tolerate direct or indirect support to non-state armed groups or to public or private security forces that unlawfully control mine sites, transportation routes, and other upstream actors in the supply chain; unlawfully tax or extort money or minerals at access points to mine sites, along transportation routes or at points where minerals are traded; or unlawfully tax or extort intermediaries, exporters, or international traders.



Bribery and money laundering

The signatories will not offer, promise, hand over or demand bribes, or give in to any request for bribes, to conceal or disguise the origin of minerals, to misrepresent taxes, fees, and royalties paid to governments for the purposes of mineral extraction, trading, handling, transportation, and exportation.

The signatories will make every effort to assist in effectively combating money laundering or take appropriate action if there is a reasonable risk of money laundering arising as a result of or in connection with the mining, trading, handling, transportation or export of minerals obtained through unlawful taxation or extortion at access points to mining sites, along transportation routes, or at upstream company handling sites.

The signatories will support efforts to effectively eliminate money laundering where they identify an appropriate money laundering risk resulting from or associated with the extraction, trading, handling, transportation, or export of minerals obtained from illegal taxation or extortion at access points to mine sites, along transportation routes, or at points where minerals are traded by upstream actors.

Fair competition and antitrust law

The signatories undertake to promote fair competition and to comply with antitrust law and other competition-regulating requirements.

Conflicts of interest

The signatories commit to prevent conflicts between official duties and private interests in their business decisions. Conflicts of interest must be disclosed and resolved as quickly as possible.

Environmental issues

The signatories are encouraged to undertake sustainable resource management, responsible chemical management, efficient energy management, and the use of renewable energies. Applying the precautionary principle, the signatories commit to the implementation of measures to reduce waste, and to prevent environmental pollution such as causing harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption. Internationally recognized human rights, such as in particular the rights to a healthy environment and clean water and sanitation, must be respected.

Whistleblowing and protection against retaliation

The signatories are encouraged to report misconduct, particularly violations of applicable laws and internal policies and procedures related to VARTA, by the VARTA Integrity Line:

<https://varta.integrityline.org/>

The grievance mechanism is publicly accessible and allows anonymous reporting if desired. The persons entrusted with the evaluation of the indications act impartially, are independent, are not bound by instructions and are sworn to secrecy. The confidentiality of the identity of the whistleblower is maintained during the whole process and beyond. Whistleblowers must not fear retaliation arising as a result of their disclosure of information, either by VARTA or by other parties. Whistleblowers are subject to special protection. VARTA and the signatories are committed to protecting whistleblowers from discrimination, intimidation, and retaliation, including conducts from third parties.



Supply Chain Transparency and Due Diligence

The signatories commit to trace their supply chain and share the information upon request. The signatories are willing to work with suppliers, central or local government authorities, international organizations, civil society and concerned third parties, in accordance with their position in the supply chain, to improve and track performance to avoid or mitigate risks. If the signatories have reasonable suspicion that a supplier is not complying with this VARTA Supplier Code of Conduct, they will consider options for suspending or terminating the supply in question after attempts at mitigation have failed.

Consequences of breaches of the VARTA Supplier Code of Conduct

Any breach of the obligations described in this VARTA Supplier Code of Conduct constitutes a breach of contract with VARTA and a material impairment of the business relationship between VARTA and the signatory. The signatory shall, within a reasonable timeframe, inform VARTA of the internal measures taken to prevent future breaches and in the event that the signatory should fail to comply with these obligations or fail to take appropriate corrective action after VARTA's request within a reasonable timeframe, or if the breach of the VARTA Supplier Code of Conduct is so severe that VARTA cannot be reasonably expected to continue the business relationship, VARTA reserves the right – without prejudice to any other rights – to terminate the relationship without prior notice and rescind any associated contracts or agreements.

Further information

For more information on social compliance or responsible sourcing topics, suppliers are invited to participate in the training programme of the [Responsible Minerals Initiative](#).

Contact

If there are any questions or comments, feel free to send them to sustainability@varta-ag.com.

Agreement

The signatories agree to promote the principles and require their suppliers and subcontractors to comply with this VARTA Supplier Code of Conduct.

Supplier /Signatory

Place/Date

First Name, Last Name

Function