

Transparency from source to product

EPnP



Embedded parts and partners

epnp.de



For technologies that
change lives

SUPPLIER CODE OF
CONDUCT

LEGAL NOTICE

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INFORMATION

Preparation and data quality:

When preparing this Supplier Code of Conduct, the primary objective was to present our policies in a transparent and accurate manner. Where appropriate, rounded figures are used to improve readability. Please understand that despite our rigorous review and proof-reading process, occasional rounding errors, typographical errors, or layout errors may still occur.

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For technologies that change lives

Dear Business Partners,

At EPnP, we are driven not only by the precision of our work but also by the difference it makes. Our technologies are used in operating rooms, vehicles, aircraft, satellites, and the industrial facilities of the future.

There, they contribute in ways that go far beyond technology: **they help improve people's lives.**

Our mission is to help position the economy at the heart of Europe as a leading force in engineering excellence and forward-looking innovation. We achieve this by combining our expertise. With EPnP Integrated Systems, EPnP Precision Mechanics in southern Germany, and EPnP Technologies in Austria, we offer a fully integrated value chain that extends from initial design to series production.

Our EcoVadis Bronze Medal also reflects our commitment to responsible business practices and demonstrates that we are well positioned for long-term economic, social, and technological success.

Ultimately, it is not just about components or systems but also about working together to create solutions that make a real difference.

Yours sincerely,
Kordt Griepenkerl. Ph.D.
CEO, EPnP

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Introduction to the Supplier Code of Conduct

Relationships between EPnP and its business partners, including suppliers, subcontractors, and strategic partners, are based on fair, honest, and mutually beneficial business practices. These practices support high standards of quality in products and services.

EPnP therefore expects all business partners to uphold fundamental ethical values and comply with the principles and standards set out below within their own organizations.

Wherever possible, suppliers should ensure that their own suppliers and subcontractors also follow these principles.

This Supplier Code of Conduct applies to all EPnP suppliers and their affiliated companies.

Across all areas of our business, EPnP is committed to:

DIVERSITY, FAIRNESS, AND
MUTUAL RESPECT ACROSS
ALL OUR TEAMS.



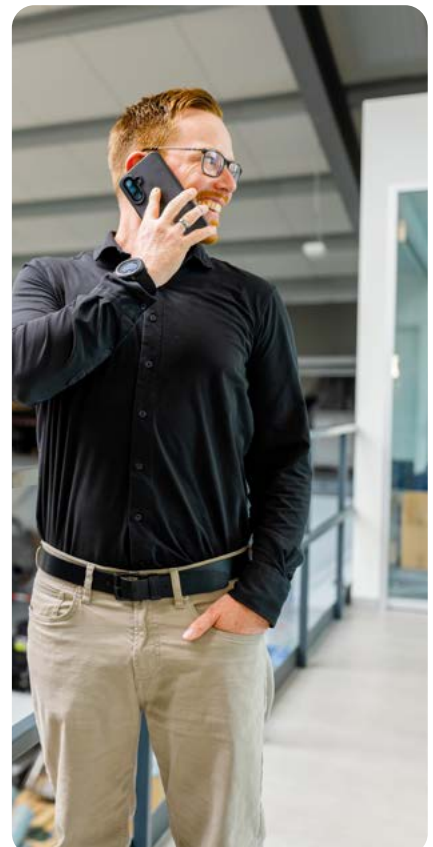
Safe and fair working conditions
as the foundation for quality
and success (EPnP assembly
manufacturing).

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ACCIDENT RATE

OPEN DIALOG AND
COLLABORATIVE PARTNER-
SHIPS BASED ON MUTUAL
RESPECT.

Plant management at the
EPnP facility in Schweinfurt:



Labor relations and employment law

GENERAL PRINCIPLE

Suppliers are expected to maintain fair and ethical labor practices that respect internationally recognized fundamental human rights, including the Universal Declaration of Human Rights, applicable international agreements, and the conventions of the International Labor Organization (ILO).

OCCUPATIONAL HEALTH AND SAFETY

Suppliers must provide their employees with a safe and healthy working environment in accordance with all applicable local laws and industry-specific regulations.

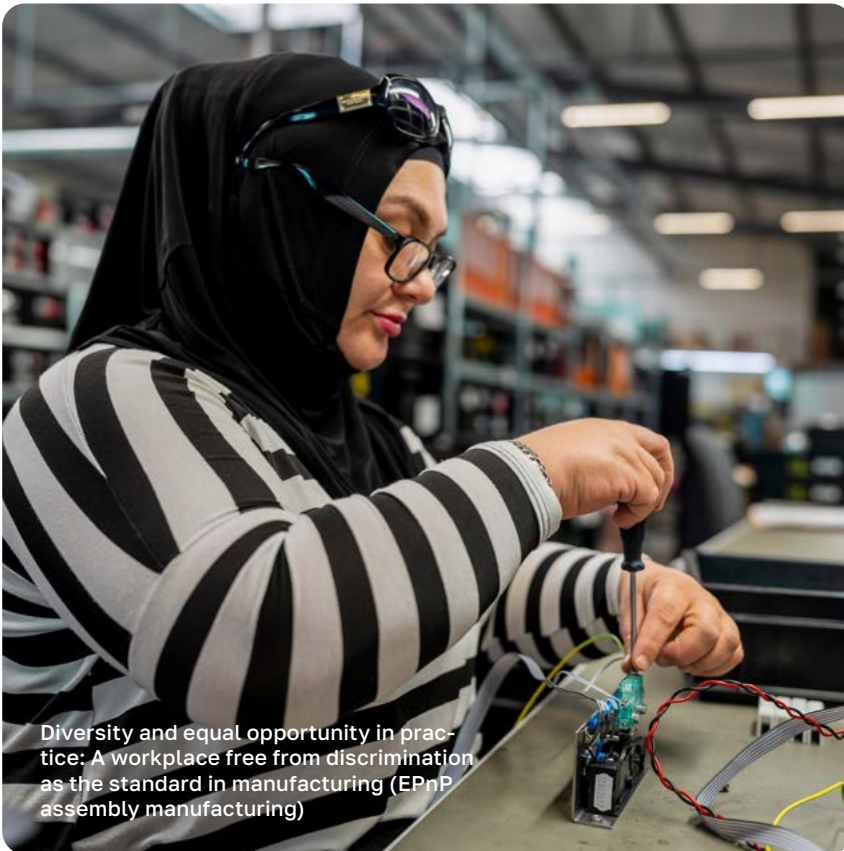
Appropriate measures must be taken to prevent accidents, work-related injuries, and occupational illnesses associated with business activities and the operation of manufacturing equipment.

Suppliers are expected to appoint a **health and safety officer** to oversee compliance with these requirements within their organization.

WAGES, SALARIES, AND WORKING HOURS

Suppliers must comply with all applicable local laws governing minimum wages, regular working hours, and employee benefits. Overtime must be voluntary and compensated at the regular or overtime rate as required by applicable local law.

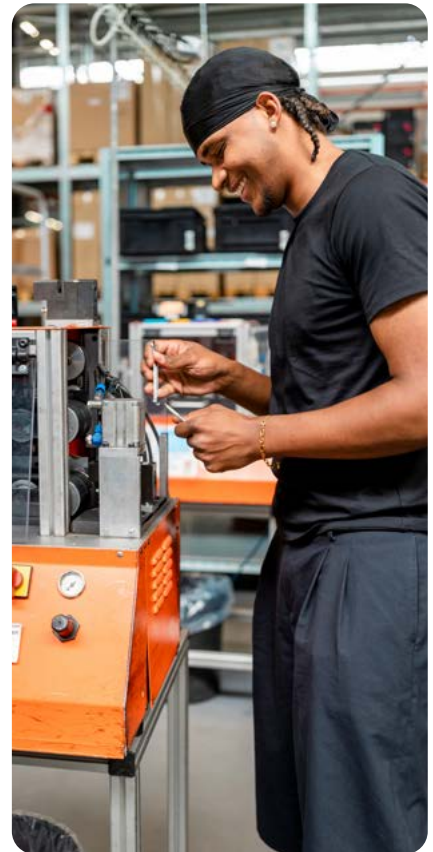
Under exceptional circumstances, employees may be required to work beyond their regular working hours for a limited period. In such cases, any additional working hours and consecutive working days must comply with applicable local requirements and be scheduled to ensure safe and humane working conditions.



Diversity and equal opportunity in practice: A workplace free from discrimination as the standard in manufacturing (EPnP assembly manufacturing)

Creating value through expertise:

OPTIMAL CONDITIONS FOR ERROR-FREE HOSE CUTTING PROCESSES.



100%

TRANSPARENCY



END-TO-END TRACEABILITY OF RAW MATERIALS AND CONFLICT MINERALS

Responsible sourcing:

FREEDOM OF ASSOCIATION

Suppliers may not prevent employees from joining lawful and peaceful labor organizations or collective bargaining associations.

Where local labor law restricts these rights, suppliers are expected to support alternative forms of independent employee representation and collective bargaining.

NO DISCRIMINATION

Suppliers may not discriminate against employees in hiring, compensation, benefits, promotion, discipline, termination of employment, or retirement based on race, color, caste, national or ethnic origin, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation, or age.

EPnP expects its suppliers to implement measures that promote diversity, equity, and inclusion.

This includes equal treatment policies and targeted training.

PROHIBITION OF CHILD LABOR

Individuals under the age of 15 or below the minimum school-leaving age may not be employed.

REQUIREMENT TO USE A CONFLICT MINERALS REPORTING TEMPLATE (CMRT)

Selected suppliers must complete the current Conflict Minerals Reporting Template ([CMRT](#)) of the Responsible Minerals Initiative or an equivalent questionnaire and provide it to EPnP upon request.

The goal is to ensure the traceability of conflict minerals throughout the supply chain.



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Putting responsibility into practice:

COMPLIANCE WITH FAIR EMPLOYMENT STANDARDS THROUGHOUT THE LOGISTICS CHAIN.



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ILO STANDARDS

RESPECTFUL TREATMENT AND SAFE WORKPLACES FOR ALL EMPLOYEES.

People first:

Corporate social responsibility (CSR)

Suppliers must comply with all applicable local legal requirements relating to the employment of young workers, particularly with respect to working hours, compensation, occupational health and safety, and general working conditions.

Young workers are employees between the ages of 15 and 18.

NO FORCED LABOR

Suppliers are prohibited from using forced labor in any form. This includes prison labor, compulsory labor, debt bondage, or any other form of coercion.

Forced labor includes any work or service performed under the threat of punishment or under conditions that the individual has not accepted voluntarily.

NO DISCIPLINARY ABUSE

Suppliers may not harass, physically punish, or threaten individuals with violence, impose financial penalties, or subject them to physical

or psychological abuse, coercion, or intimidation.

Responsible environmental management

Suppliers must comply with all applicable local laws and industry-specific regulations and are expected to adhere to the principles set out in this Code.

BUSINESS OPERATIONS AND PRODUCTION FACILITIES

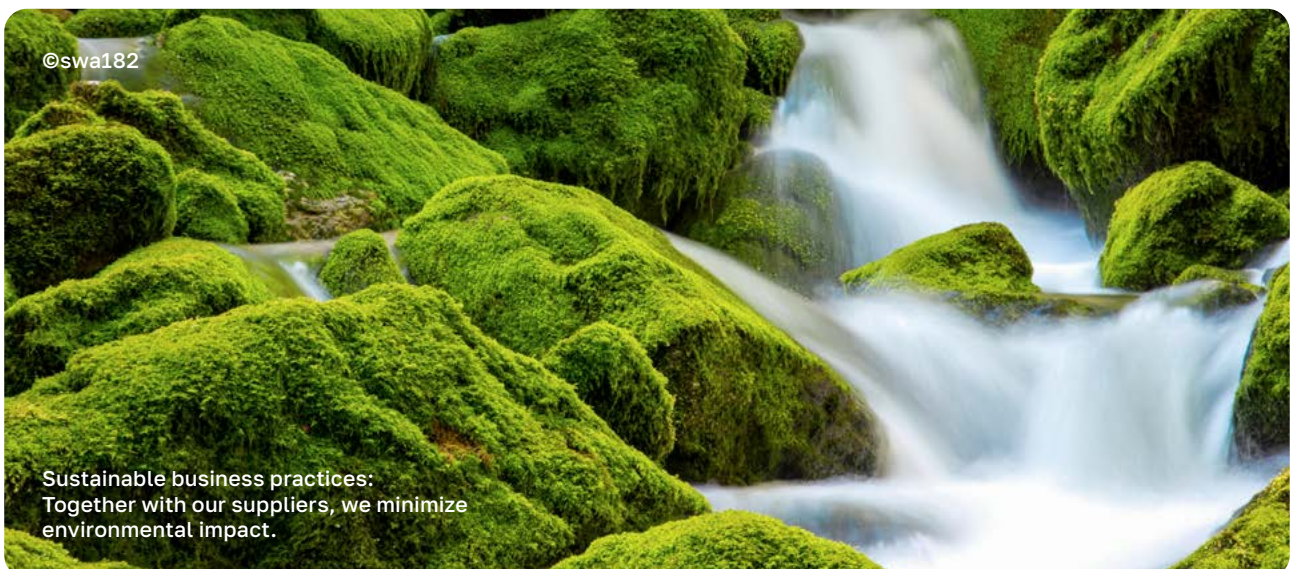
Suppliers must consider environmental impacts when developing, planning, and operating production facilities as well as when conducting other business activities.

Suppliers are responsible for ensuring that the construction, renovation, modernization, and any other work carried out at production facilities complies with all applicable local environmental laws, regulations, and standards and is performed in an environmentally responsible manner.

ENERGY AND WATER CONSUMPTION

Suppliers are expected to monitor and reduce the consumption of water, energy, oil, natural resources, and other operating materials while continually seeking to improve resource efficiency and minimize waste. This also includes heating, lighting, ventilation, and air conditioning.

Wherever possible, managers and employees responsible for packaging and transportation must improve energy efficiency through careful shipment planning, organization, and consolidation.



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Sustainable business practices:
Together with our suppliers, we minimize
environmental impact.

EMISSIONS AND WASTEWATER

Suppliers must strictly comply with all applicable environmental laws and industry-specific pollution control requirements, including the use of appropriate containment and filtration systems where required.

Production facilities must monitor and limit greenhouse gas emissions, ozone-depleting substances, wastewater discharges, and other pollutants generated by manufacturing operations in accordance with applicable local regulations and industry best practices.

WASTE RECYCLING

Suppliers must monitor waste collection and material-specific recycling with particular attention to the handling of hazardous substances. Materials are reused wherever possible.

Circular economy in practice:

**MATERIAL-SPECIFIC
RECYCLING SUPPORTS A
CLOSED-LOOP CIRCULAR
ECONOMY.**

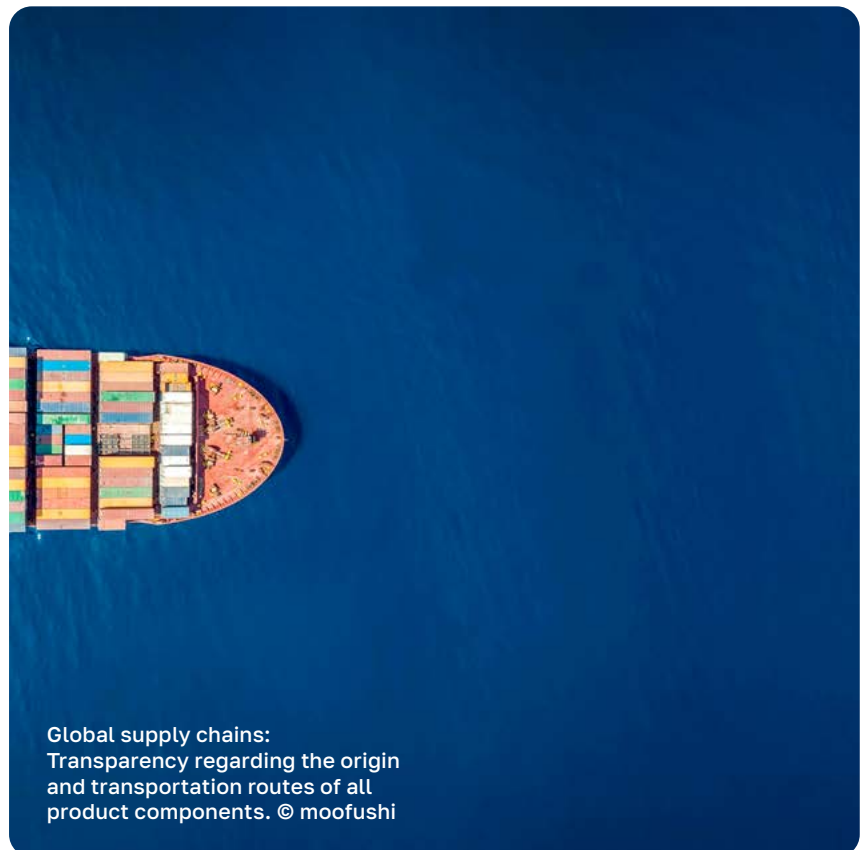




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Comprehensive
documentation:

RELIABLE IDENTIFICATION
AND VERIFICATION OF
REGULATORY COMPLIANCE.



Global supply chains:
Transparency regarding the origin
and transportation routes of all
product components. © moofushi

365

VALIDATION

VERIFICATION OF PRODUCT
INFORMATION, REACH DATA,
AND PROOF OF ORIGIN.

Product compliance:
ongoing validation.

Product information and labeling

Suppliers must also provide accurate information about relevant raw materials, transportation requirements, and disposal methods.

All product-related information, particularly data concerning chemicals, GMOs, and hazardous substances, must be disclosed accurately and completely in accordance with applicable local and international legal requirements and industry standards.

Suppliers are required to carry out a formal assessment of the REACH compliance of their products and components.

Upon request, suppliers must provide documented confirmation of compliance with the **REACH Regulation (EC) No. 1907/2006**, including all relevant registration numbers, safety data sheets, and substance lists.

COUNTRY OF ORIGIN OF PRODUCT COMPONENTS

EPnP may request information from suppliers regarding the origin and source of components and raw materials.

This may also apply to the products supplied.

Suppliers must proactively notify EPnP of any changes to the origin of components or raw materials or to the manufacturing location of components.

Ethical business principles

GENERAL PRINCIPLES

Suppliers are expected to conduct business in a spirit of trust and in accordance with these ethical business principles. By protecting confidential business information, respecting the principles governing trade secrets, safeguard-

ing intellectual property, and conducting business with integrity, honesty, transparency, and reliability, suppliers contribute to stable, long-term, and sustainable business relationships with EPnP.

GIFTS AND HOSPITALITY

Suppliers must maintain a zero-tolerance policy toward all forms of corruption, bribery, extortion, embezzlement, and other fraudulent conduct.

Suppliers may not offer incentives, bribes, or any other form of compensation that could compromise objective and impartial business decisions by contacts within the EPnP Group.

CONFLICTS OF INTEREST

A conflict of interest exists when a person has a private or personal interest that could influence business decisions.

Accordingly, suppliers must avoid any relationships, transactions, or activities that conflict—or could conflict—with an objective and fair business relationship with EPnP. If such actual or potential conflicts arise, suppliers must notify EPnP without delay.

FAIR COMPETITION

Suppliers must conduct their business according to the principles of fair competition and comply with all applicable antitrust and competition laws.



SPECIAL REQUIREMENTS AND CONFLICT MINERALS

Suppliers must ensure that any production, delivery, or other activity requiring specific government, legal, or regulatory approvals is carried out only after the necessary approvals have been obtained.

Suppliers must take appropriate measures to prevent the use of conflict minerals, including tantalum, tin, tungsten, gold, and cobalt. In particular, this includes sourcing these raw materials exclusively from verifiably conflict-free sources, preferably those certified according to OECD-aligned standards.



Implementation and compliance

GENERAL PRINCIPLE

EPnP expects suppliers to communicate the principles set out in this Supplier Code of Conduct to their employees, subcontractors, and other third parties with whom they do business so that these principles are incorporated into their business activities.

PROCEDURE

Suppliers are expected to report any existing or potential deviations from the standards set out in this Code and submit appropriate corrective action plans to EPnP for review.

EPnP procurement personnel receive training to assess whether the sourcing of raw materials, semi-finished products, and finished goods follows best practices in accordance with this Code. Colleagues and third parties may also be consulted to evaluate this question.



Verification of standards: Digital analysis and assessment of compliance criteria on an equal footing.

ASSESSMENT

EPnP may request information from its suppliers regarding compliance with this Supplier Code of Conduct.

Where appropriate, EPnP may require suppliers to provide verification of compliance through independent certification.

EPnP reserves the right to have products and materials independently tested to verify compliance with this Supplier Code of Conduct.

EPnP reserves the right to conduct unannounced on-site audits of suppliers and subcontractors. These audits may cover environmental, social, occupational health and safety, and compliance matters. Suppliers must ensure the necessary transparency and cooperation during such audits.

SUPPLIER INCENTIVE PROGRAMS

EPnP regularly evaluates the environmental and social performance of its suppliers. Based on these assessments, EPnP may introduce incentive programs such as preferred supplier

status, bonus mechanisms, and public benchmarking in order to encourage responsible business practices.

NON-COMPLIANCE AND PENALTIES

If suppliers, their own suppliers, or subcontractors violate this Supplier Code of Conduct, EPnP reserves the right to terminate the business relationship.

Establishing a business relationship with EPnP requires acceptance of the Supplier Code of Conduct as part of the general terms and conditions of supply.



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