



Supplier Code of Conduct (SCoC)

Passion for Food – Committed to Sustainability

Sustainable development and ethical conduct are central focuses of the Spitz Group. We are committed to embedding these principles throughout our supply chain and expect our suppliers to adhere to internationally recognized standards such as the UN Guiding Principles on Business and Human Rights and the ILO Conventions. Ensuring these principles in our supply chain is of utmost importance to Spitz and all group companies. Our goal, as part of our central procurement policy, is to continuously develop the sustainability performance of our suppliers in their and thus our supply chain through close collaboration. We expect our suppliers to comply with all applicable laws and to align with internationally recognized human rights, environmental, social, and corporate governance standards ("ESG Standards"). We also expect suppliers to demand these standards from their own suppliers and subcontractors.

Spitz suppliers are required to create safe working conditions, always treat employees with respect, act fairly and ethically, and apply environmentally friendly practices in the production of their products or the provision of services for or on behalf of Spitz. The principles contained in this Supplier Code of Conduct, as well as applicable legal regulations, provide the framework for suppliers to continuously improve their own processes and promote an environmentally and socially conscious supply chain. To ensure compliance with this Code of Conduct, Spitz reserves the right to verify implementation through audits conducted by qualified company representatives or commissioned third parties (e.g., accredited certification bodies). Spitz expects suppliers to grant access to their facilities and all relevant documents for this purpose.

1. Compliance with Laws

Suppliers who provide products to Spitz or perform services for Spitz are required to conduct their business activities in full compliance with the laws of their respective countries and all other applicable laws, regulations, and provisions. This includes labor, health and safety, and environmental regulations.

2. Occupational Safety and Health Protection

Spitz suppliers are required to create a safe working environment for their employees. This includes providing employees with appropriate procedures and training on safety and health, machine safety, and safe facilities. Additionally, suppliers are required to identify, assess, and manage safety and health risks through a process of risk elimination, technical controls, and management controls.

3. Labor Standards

Child Labor, Minimum Age of Employees

Spitz requires suppliers to comply with all local labor laws regarding minimum age and child labor. Child labor is unacceptable under any circumstances. In this context, suppliers are expected to maintain official records of the birth dates of all employees. Suppliers are also required to comply with all applicable laws regarding hiring, wages, working hours, overtime, and working conditions.



This includes compliance with ILO Conventions 138 and 182. Suppliers must maintain official records of the birth dates of all employees.

Forced Labor

Suppliers must refrain from using any form of forced labor, servitude, or involuntary labor. Slavery or human trafficking is strictly prohibited. All work performed for or on behalf of suppliers must be voluntary.

Non-Discrimination

Suppliers are required to hire employees based on their suitability for the job and not on personal characteristics or beliefs. Employees must not be unfairly disadvantaged, preferred, or excluded based on ethnicity, color, nationality, religion, gender, age, marital status, maternity or paternity, disability, physical characteristics, sexual orientation, union membership, or political affiliation.

Humane Treatment

All employees must be always treated with respect. Suppliers must not use punishment or other forms of physical or psychological coercion, sexual harassment, sexual abuse, verbal abuse, or threats of such treatment.

Working Hours and Compensation

Suppliers are required to set working hours in accordance with all applicable laws. Employee compensation must comply with applicable national wage laws and ensure a reasonable standard of living. Additionally, employees must be paid on time and in full.

4. Environment

Suppliers comply with all applicable environmental, occupational health and safety regulations, as well as international agreements on environmental standards. They promote the safe and environmentally sound development, manufacture, transport, use, and disposal of their products and ensure through appropriate management systems that product quality and safety meet applicable requirements. Suppliers protect the lives and health of their employees, neighbors, and the public from hazards that may arise from their production processes and products. Suppliers ensure the careful and efficient use of resources, the promotion of energy-efficient and environmentally friendly technologies, and the reduction of waste and emissions into air, water, and soil. Illegal forced evictions and illegal withdrawals of land, forests, and water bodies are not conducted.

5. Ethical Conduct

Suppliers must conduct their business in compliance with fair competition and in accordance with all applicable laws on fair competition.

Suppliers must not engage in or allow any form of corruption, extortion, or embezzlement. Corruption includes bribery, extortion, and embezzlement. Suppliers must ensure that no bribes or other illegal incentives are offered. Employees of the Spitz Group must not accept gifts of more than nominal value or other personal benefits.



In the spirit of ethical business practices, suppliers are required to provide their employees with the opportunity to raise concerns and report grievances. Such reports must be treated as confidentially as possible. All reports must be appropriately investigated and remedied if necessary. It is expected that no retaliation or harassment will occur against employees who make a report in good faith.

Critical Raw Materials

Suppliers undertake, upon request by Spitz, to provide information on the country of origin of raw materials to enable Spitz to examine the upstream supply chain in the event of justified concerns about compliance with this code.

6. Monitoring and Enforcement

By signing this document, suppliers acknowledge the above principles. Their commitment to these principles can be demonstrated, for example, through their own code of conduct and/or company policies that include these standards.

Spitz reserves the right to conduct audits or evaluations, as mentioned above, to ensure that suppliers comply with laws, rules, and standards, and will take appropriate action based on the results concerning the business relationship if there are grounds for concern. Spitz also reserves the right to terminate the business relationship if international principles are violated, no measures are taken to remedy the violations, or systematic violations are apparent.

Other contractual obligations remain unaffected by this Supplier Code of Conduct and take precedence over the provisions described in this document. This applies in particular to codes of conduct that require you to comply with certain ESG standards and/or requirements from supply chain laws (e.g., the Supply Chain Due Diligence Act, CS3D, etc.).

If you have concerns about illegal behavior or misconduct, please contact: <https://www.spitz.at/wp-content/uploads/2022/08/Spitz-Hinweisgeber-Richtlinie.pdf>

Signature, Place, Date