

ZEPPELIN
WE CREATE SOLUTIONS

SUPPLIER

CODE OF CONDUCT

Together we act responsibly, ethically and lawfully.

zeppelin.com

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SUPPLIER CODE OF CONDUCT[1]

I. PREAMBLE

The Zeppelin Group, that is, Zeppelin GmbH together with its affiliates ("Zeppelin"), bears a special responsibility with regard to responsible, ethical, and lawful conduct. As a foundation-owned company, environmentally and socially responsible corporate governance is not merely a legal requirement for us, but a matter of course anchored in our corporate culture. For example, Zeppelin joined the **UN Global Compact** in 2016.

Our aim is to continuously optimize our business activities, products, and services in the interests of sustainability. We expect our partners, that is, our suppliers, service providers, and subcontractors ("Suppliers"), to contribute to this in the interests of promoting a holistic approach.



Sustainability

"At Zeppelin, sustainability means making a long-term, genuine contribution to the environment and society on the strength of our culture as a company that is fit for the future and economically successful."

Zeppelin hereby agrees with its Suppliers that the following provisions shall govern their cooperation as a joint Code of Conduct. This agreement forms the basis for all future deliveries and projects. Zeppelin and its Suppliers undertake to adhere to the principles and requirements of the Code of Conduct and to comply with the applicable laws. Zeppelin reserves the right to monitor the obligations to comply with the Code of Conduct as part of regular risk analyses and, among other things, to implement preventive measures with its Suppliers in accordance with the German Supply Chain Due Diligence Act (LkSG).

II. SOCIAL RESPONSIBILITY & HUMAN RIGHTS



Zeppelin advocates the observance of human rights, as ratified in the key international conventions for the protection of human rights. The company also considers agreements with the aim of protecting the environment and ensuring fair and healthy working conditions for the employees of its Suppliers, its business partners, and its Group companies, such as those resulting from the ILO Core Labor Standards and the LkSG, to be directly binding. Zeppelin also holds its Suppliers to this standard.

Exclusion of forced labor

Zeppelin expects its Suppliers to refrain from any form of forced labor or human trafficking in their companies and not to engage in such in any form.

Forced labor

"Forced labor refers to activities which people are forced into against their will under threat of penalty."

Rights of minorities and indigenous peoples

Respect for human rights also entails protecting the rights of minorities and indigenous peoples.

Prohibition of child labor

Zeppelin expects its Suppliers to prohibit and refrain from any kind of child labor.

Child labor

"Child labor is work for which children are too young or which is too dangerous or exploitative, which harms their physical or mental development, or prevents children from attending school."



Fair remuneration

Zeppelin expects its Suppliers to remunerate their employees in accordance with the applicable national laws and, in any case, to comply with the statutory minimum wage or the industry-standard minimum and to work toward equal pay for male and female workers for equivalent work.

Fair working hours

Zeppelin expects its Suppliers to comply with the applicable national legislation on the establishment of fair working conditions and working hours.



Freedom of association

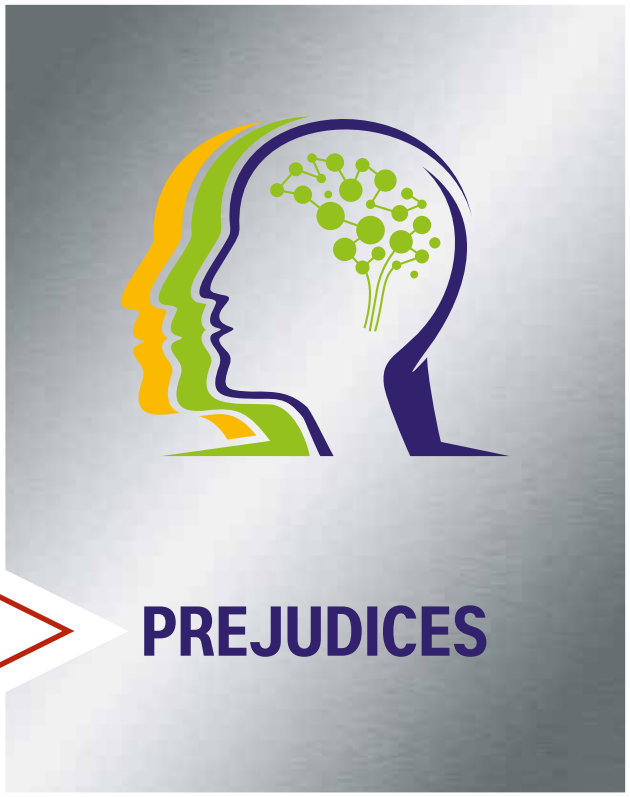
Zeppelin expects its Suppliers to respect their employees and support them in exercising their freedom of association and the right to collective bargaining in accordance with the applicable laws.

Freedom of association

"Freedom of association is the right to unite for common purposes and to strive for them together."

Promotion of diversity and non-discrimination

Zeppelin expects its Suppliers to promote equal opportunities and equal treatment and to prevent discrimination in the recruitment of employees and in the promotion or granting of training and further education measures. No employee shall be discriminated against on grounds of origin, gender, age, skin color, sexual identity, physical limitations, political opinion, religion, or belief.



Discrimination

"Discrimination means disadvantaging or degrading of groups or individuals according to specific values, prejudices or irrational attitudes."

Health protection – Safety in the workplace

Zeppelin expects its Suppliers to bear responsibility for establishing a safe and healthy working environment. This includes the establishment and application of appropriate occupational safety systems as necessary precautionary measures against accidents and damage to health that may arise in connection with the activity. Appropriate measures are to be taken to prevent excessive physical or mental fatigue. The consumption of alcohol or drugs is not permitted on Zeppelin's company premises. Suppliers may not enter the premises or perform work for Zeppelin if they are under the influence of alcohol or drugs. Zeppelin also expects its Suppliers to provide their employees with regular information and training on applicable health and safety standards and measures. No employees may be denied access to drinking water in sufficient quantities or to clean sanitary facilities.

Safeguarding natural resources

Zeppelin expects that its Suppliers will not, in violation of legitimate rights, appropriate land, forests, or waters if their use secures the livelihoods of persons. Zeppelin also requires its Suppliers to refrain from harmful changes to the soil, water and air pollution, noise emissions, and excessive water consumption if this damages the health of persons, significantly impairs the natural basis for food production, or prevents persons from accessing proper drinking water or sanitary facilities.



Handling conflict minerals

Zeppelin expects its Suppliers to establish processes for conflict minerals and other raw materials (cf. currently REGULATION (EU) 2017/821) that comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Conflict materials include tin, tantalum, tungsten, gold, or other raw materials such as cobalt or mica.

Conflict minerals

"Conflict minerals are natural resources or minerals cultivated or extracted in conflict-affected or high-risk areas. In many cases, production and mining takes place illegally. Systematic violations of human rights and international law are often accepted for their acquisition."



Deployment of private and public security professionals

When deploying private or public security professionals to protect a business establishment, it must be ensured that those affected are protected from excessive violence, torture, and the violation of freedom of association and the right to organize. Suppliers must ensure that security professionals observe internationally recognized human rights.

III. ENVIRONMENTAL RESPONSIBILITY – ENVIRONMENTAL PROTECTION

Zeppelin expects its Suppliers to comply with the applicable environmental protection laws and international guidelines for improving environmental conditions. Zeppelin also expects its Suppliers to implement a responsible, sustainable resource management system, thereby reducing negative environmental impacts, and ideally to develop and apply an appropriate environmental and/or energy management system (for example, in compliance with ISO 14001 or ISO 50001). Zeppelin expects its Suppliers to avoid environmental accidents as far as possible and to have procedures in place to be able to react appropriately if they should occur.

Environmental management system

"An environmental management system is the management system of a company in which the organization's operational environmental policy is defined and organized. The main objective of an environmental management system is the continuous improvement of environmental performance and the continuous reduction of negative environmental impacts."





Treatment and discharge of industrial wastewater

Zeppelin expects its Suppliers to classify, monitor, assess, and, if necessary, treat wastewater from their operations, manufacturing processes, and sanitary facilities prior to discharge or disposal. In addition, measures should be introduced to reduce the production of wastewater.

Managing air emissions

Zeppelin expects its Suppliers to classify, routinely monitor, assess, and, if necessary, treat general emissions from operations (air and noise emissions) and greenhouse gas emissions, where possible throughout their entire value chain, prior to their release. Suppliers are also responsible for monitoring their waste gas treatment systems and are required to find cost-effective solutions for minimizing any emissions. The use of renewable energies, such as solar energy or wind power, is to be preferred to the use of fossil energy sources where possible.



Managing waste and hazardous substances

Zeppelin expects its Suppliers to follow a systematic approach for identifying, handling, reducing, and responsibly disposing of, or recycling solid waste. The prohibitions on exports of hazardous waste in the Basel Convention of March 22, 1989, in its current version, must be observed. Zeppelin also requires its Suppliers to properly identify chemicals and other environmentally hazardous substances and to handle them throughout their entire life cycle – in particular during handling, transport, storage, use, recycling, and disposal – in such a way that the applicable required safety measures are guaranteed. Hazardous substances are to be replaced with less harmful alternatives where possible.

Zeppelin expects its Suppliers to comply with the obligations arising from the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants (POPs), and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes.

Mercury is to be used in conformity with the prohibitions of the Minamata Convention of October 10, 2013, and persistent organic pollutants are to be used in conformity with the Stockholm Convention of May 23, 2001, in their respective current versions.



Reducing the consumption of raw materials and natural resources

Zeppelin expects its Suppliers to reduce or avoid the use and consumption of resources in their production as well as the generation of waste of any kind, including water and energy. This is to take place either directly at the point of origin or through procedures and measures, for example, by changing production and maintenance processes or organizational processes, by using alternative materials, by economizing, recycling, or reusing materials.

Biodiversity, land use, deforestation, and the protection of animals

Zeppelin expects its Suppliers to support biodiversity conservation activities as far as possible. These include responsible land use, preservation of soil quality, protection and conservation of biodiversity and animals, and prevention and reduction of deforestation. Suppliers are required to comply with all national and international legal standards on animal protection and welfare.

Managing energy consumption/efficiency

Zeppelin expects its Suppliers to monitor and document their energy consumption. Cost-effective solutions are to be found to improve energy efficiency and minimize energy consumption.

Managing energy consumption

"Energy efficiency generally describes the ratio of a certain benefit – for example, the provision of light or heat – to the energy input. The lower the input of energy, the more energy-efficient a product or service is."

IV. ETHICAL BUSINESS CONDUCT

Zeppelin expects its Suppliers to comply with the applicable laws and to define their business activities in accordance with ethical principles.

Prohibition of corruption and bribery

Zeppelin expects its Suppliers to impose the highest standards of integrity and to not engage in any form of bribery or corruption. In doing so, they ensure that business decisions are not influenced by inappropriate or illegal consideration (whether in the form of cash, gifts, travel or other benefits or items of value). No invitations, gifts or other items intended to exert influence may be given to Zeppelin employees.

Bribery/corruption

"Bribery or corruption is the giving and/or receiving of gifts and gratuities, financial and in-kind, in order to improperly influence business results."

Fair competition

"Fair competition complies with antitrust and trade laws, pricing regulations, and competition law. They seek to ensure a free market and consumer protection."

Fair competition

Zeppelin expects its Suppliers to comply with and promote the standards of fair business activity, fair advertising, and fair competition. Suppliers shall comply in particular with the relevant antitrust laws.

Confidentiality/data protection

Zeppelin expects its Suppliers to protect confidential information and to comply with data protection laws and contractual provisions.

The protection of personal data and confidential information of customers, business partners, and employees is a matter of course for Zeppelin. Zeppelin requires its Suppliers to implement adequate technical and organizational measures to ensure data protection. In accordance with the principles of the EU General Data Protection Regulation (GDPR), data protection must be ensured in the design and configuration of technical facilities and applications. On the basis of international standards, Zeppelin expects a high level of information security, which its Suppliers are to assess for effectiveness through regular security audits.



Material and intellectual property

Zeppelin expects its Suppliers to protect the material and intellectual property of Zeppelin and others against loss, theft, and misuse, and to treat any information provided to them as confidential.





Avoiding conflicts of interest

Zeppelin expects its Suppliers to avoid conflicts of interest and their actions to always be characterized by integrity and transparency. Situations that conflict with Zeppelin's business interests shall be avoided. Zeppelin employees may also not hold any financial interest in a Supplier's company.

Conflicts of interest

"A conflict of interest is a situation in which professional judgment or action relating to a primary interest is improperly influenced by a secondary interest."

Financial responsibility

Zeppelin expects its Suppliers to keep accurate books and records. Accounting must follow legal requirements and generally accepted accounting principles.

V. COMBATING TERRORISM & EXPORT CONTROLS

Implementing and complying with national and international measures to combat terrorism, such as export control regulations, sanctions, and embargoes or regulations to prevent money laundering, is a matter of course for Zeppelin and forms the basis for safeguarding its global business relationships.

Zeppelin expects its Suppliers to comply strictly with all applicable international anti-terrorism regulations and to comply with the rules and regulations on import and export controls, including the applicable economic embargoes.

Combating terrorism

"Anti-terrorism measures refers in particular to those that prevent terrorist offenses and exclude the possibility of financial, economic, or technical means (including know-how) being made available to their perpetrators."





VI. IMPLEMENTATION OF MEASURES

Zeppelin reserves the right to audit compliance with the provisions of the Code of Conduct or to appoint an auditor to do so. Zeppelin will give reasonable notice before the audit is carried out. For this purpose, Suppliers shall ensure that Zeppelin and/or the auditor has access to their business premises during normal business hours and is able to inspect and access, without any restrictions, all documents, data, and systems related to the performance of the contracts concluded. Suppliers are entitled to take suitable measures to protect their trade and business secrets and to protect confidentiality with regard to their customer data.

If Suppliers culpably violate the provisions of this Code of Conduct, Zeppelin is entitled to temporarily suspend the business relationship after a grace period has elapsed without the matter being resolved. If it is unreasonable for Zeppelin to continue the contract until ordinary termination, Zeppelin may terminate the contract after a grace period has elapsed without any result if Zeppelin threatened to do so when setting the grace period. If German law is applicable, the right to extraordinary termination without a grace period pursuant to Section 314(2) Sentence 3 of the German Civil Code (BGB) as well as the right to compensation for damages remain unaffected.

Suppliers undertake to apply and pass on the expectations placed on them and the measures expected of them to their suppliers in their supply chain.

Suppliers shall cooperate with Zeppelin and provide Zeppelin with the best possible support with the implementation of the measures required under the LkSG with regard to the cessation, prevention, and minimization of human rights and environmental risks – in particular in the implementation of the required preventive and corrective measures.

If Zeppelin's indirect suppliers should violate the standards set forth in the Code of Conduct, Suppliers shall work closely with Zeppelin to remedy the violation.

The obligations in the Code of Conduct that Suppliers are to uphold may be amended at any time depending on the results of the risk analyses conducted by Zeppelin on an ongoing basis. Suppliers shall be informed of this by Zeppelin one (1) month before any amendment takes effect and shall have the option of objecting to it within two (2) weeks of becoming aware of it; Zeppelin shall remind Suppliers of this option by separate notice in the specific instance.

VII. REPORTING VIOLATIONS

Suppliers are required to inform Zeppelin – for example, using the Zeppelin Trust Line at **www.zeppelin-trustline.com** – of identified violations of the Code of Conduct in their area of business and of the measures taken in response. This also includes any criminal offenses and violations in their supply chains.

The same applies if there is a justified suspicion that Zeppelin employees, its partners, partners of Suppliers, or other third parties are in serious breach of the principles set forth herein, Zeppelin values, compliance rules, or applicable law.

Anonymous reporting around the clock

Reports can be submitted via the Zeppelin Trust Line around the clock. Anonymous reporting is also possible.

Contacts

Business partners can contact the Zeppelin Compliance & Data Protection Team and the CSR/Sustainability Department directly if they have any questions about this Supplier Code of Conduct and its implementation.

Compliance & Data Protection
Zeppelin GmbH
Graf-Zeppelin-Platz 1
85748 Garching near Munich
E-Mail: compliance@zeppelin.com

CSR/Sustainability
Zeppelin GmbH
Graf-Zeppelin-Platz 1
85748 Garching near Munich
E-Mail: lksg@zeppelin.com





IMPRINT

Zeppelin GmbH

Headquater:

Graf-Zeppelin-Platz 1
85748 Garching bei München
Tel. +49 89 320 00 - 0
Fax +49 89 320 00 - 482

Registered office:

Graf-Zeppelin-Platz 1
88045 Friedrichshafen
Tel. +49 7541 202 - 02
Fax +49 7541 202 - 1210

zeppelin.com

As of 05/2026