

# Code of Conduct for Business Partner

## 1 Objective

The Code of Conduct for Business Partners (hereinafter also referred to as the "**Code of Conduct**" or **CoC**) sets out our expectations of business partners regarding sustainability (hereinafter also referred to as **ESG – Environmental, Social, Governance**). ESG encompasses respect for human rights and environmental protection, as well as ethically and legally sound business practices.

## 2 Fundamental Sustainability Requirements

Our company attaches great importance to working in partnership with its business partners, which should be characterised by mutual benefit. In line with the principle of sustainability, our company is aware of its economic, ecological and social responsibility. As we are in the public eye due to our involvement in motorsport, we want to set a good example and strive to be at the forefront of sustainability. We expect our business partners to act responsibly in accordance with the provisions of this CoC. The implementation of the detailed requirements may vary depending on the business partner, including the size, business area and location of the business partner, as well as the business relationship with our company.

The sustainability requirements are based, among others, on the 10 Principles of the United Nations (UN) Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the OECD Due Diligence Guidelines for Responsible Business Conduct and the conventions of the International Labour Organisation (ILO).

## 3 Sustainability Requirements in the Area of Human Rights and Employment

Business partners undertake to comply with the conventions of the International Labour Organisation in their currently valid version. This applies even if the business partners outsource tasks to third parties, such as employment agencies or security personnel.

Specifically, the following requirements apply:

- › No use of child labour and commitment to the protection of young workers, in particular in hazardous activities.
- › No modern slavery, no human trafficking.
- › Business partners must pay their employees at least the statutory minimum wage or – where no statutory minimum wage applies – a wage appropriate to the place of employment. This should at least, as far as possible, cover the basic needs of employees and enable a decent standard of living for employees and their families (living wage).
- › Business partners comply with the applicable occupational health, safety and fire protection legislation. Occupational safety must not result in any costs for employees. Necessary fire safety measures must be implemented. Physical integrity must be guaranteed. Any form of physical punishment or violence will not be tolerated.
- › Working hours must be in accordance with the applicable legal requirements.
- › Employees must be given adequate working and living conditions. This includes, in particular, access to sanitary facilities, drinking water and other basic amenities. Compliance with minimum hygiene requirements must be ensured.

- › Business partners shall ensure that their activities do not cause illegal environmental pollution or health hazards through soil, water or air pollution, noise or excessive water consumption.
- › Any form of discrimination, intimidation, harassment or unjustified disadvantage of employees in the working environment is prohibited. This also applies to human rights and environmental defenders.
- › Business partners respect the rights of minorities, vulnerable groups and local communities to humane living conditions.
- › Business partners comply with the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and water.
- › Business partners recognize the right of all employees to form or join trade unions or employee representative bodies in accordance with national regulations. The business partner undertakes to remain neutral in this regard.

## 4 Sustainability Requirements in Environmental Protection

Business partners shall take appropriate measures to ensure the efficient use of resources such as energy, water and raw materials, and to minimise damage to the environment and health.

Specifically, the following requirements apply:

- › Greenhouse gas emissions should be continuously reduced throughout the entire supply chain by means of appropriate measures.
- › Appropriate measures shall be taken to avoid waste and to reuse resources. The safe and environmentally friendly disposal of residual materials, in particular chemicals and wastewater, shall be ensured. The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 must be complied with, insofar as this applies to the respective business partner.
- › Appropriate measures shall be taken to reduce water consumption at the business partners' own sites and along the supply chain.
- › The protection of natural ecosystems (biodiversity) and the sustainable use of natural resources must be ensured.

## 5 Sustainability Requirements for Business Ethics

Business partners shall act with integrity at all times. It is recommended that a corporate statement is in place which commits to social, ethical and environmental standards and that a sustainability officer or similar representative is appointed. Employees shall receive appropriate training on sustainability issues.

Specifically, the following requirements apply:

- › Business partners make decisions based on objective criteria and avoid conflicts of interest.
- › Corruption in any form is not acceptable.
- › Business partners respect fair and free competition and do not violate applicable antitrust and competition law.
- › Business partners ensure compliance with the applicable laws for imports and exports and do not violate applicable sanctions lists.
- › Compliance with the applicable legal provisions against money laundering is ensured.
- › Business partners respect intellectual property rights and protect relevant data.
- › Sensitive data of our company is treated appropriately and in accordance with the law and is not passed on to third parties without authorization. This also applies explicitly to the use of artificial intelligence (AI).
- › Business activities that support non-state armed groups are strictly prohibited.

## 6 Sustainability Requirements for Responsible Supply Chains

Responsible supply chain management is essential to minimize environmental impacts, promote the careful use of resources, and ensure sustainable business practices in the long term.

Specifically, the following requirements apply:

- › When procuring raw materials, business partners must comply with their duty of care in accordance with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas". This applies in particular, but not only, to tin, tantalum, tungsten and gold.
- › Business partners are obliged to comply with the requirements of the Minamata Convention on Mercury of 10 October 2013 and the Stockholm Convention on Persistent Organic Pollutants (POPs) of 23 May 2001.

## 7 Verification of Compliance

In order to identify and minimize sustainability risks in the business activity and the supply chain of the business partners, business partners provide information about their supply chain and their business activity upon request, if this is necessary for our company to fulfil its due diligence obligations (e.g. with regard to human rights practices or environmental performance).

Our company reserves the right to verify compliance with sustainability requirements by appropriate and reasonable means, both before awarding a new contract and throughout the business relationship. These checks may be carried out regularly, at random or on an ad hoc basis.

Possible verification methods include self-disclosure by the business partner and on-site inspections by external experts. On-site inspections shall only take place in the presence of representatives of the business partner, during regular business hours and in compliance with the applicable legal regulations, in particular regarding data protection. Such on-site inspections shall be announced in advance, limited to documents and processes relevant to compliance with this Code of Conduct for Business Partners, and all information obtained will be treated confidentially and used solely for this purpose.

## 8 Violation of Sustainability Requirements

If a violation of the sustainability requirements by the business partner has occurred or is imminent, the business partner shall take all appropriate measures to prevent, stop or minimise the extent of such violation. In this case, our company is entitled to take necessary and appropriate measures as well.

This also applies if there are material grounds (substantiated information) for believing that violations of the sustainability requirements in the area of human rights and employment or in the area of environmental protection occur in the business partner's upstream supply chain.

Our company further reserves the right to take other appropriate steps to protect its rights, in particular:

- › exclusion from new orders, and
- › terminating the contract, including extraordinary termination.

Our company may waive the exercise of its right of termination if the business partner can credibly affirm and prove that it has immediately initiated countermeasures to prevent future similar violations.

## 9 Reporting Misconduct

Violations of the Code of Conduct for Business Partners can be reported via

[grievance@audif1.com](mailto:grievance@audif1.com)

Reports of misconduct are treated as strictly confidential within our company. The reporting person is protected as far as possible, in particular personal data is treated in accordance with the applicable data protection regulations. However, to follow up on a report, it is necessary to provide as much detailed information as possible.

## 10 Compliance with Other Requirements

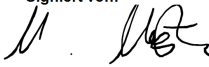
Business partners are obliged to always comply with the applicable law. If individual principles of this Code of Conduct conflict with applicable law, the legal provisions shall take precedence. Deviating contractual agreements with business partners also take precedence over the provisions of this Code of Conduct.

May 2026

Mattia Binotto  
CEO and Team Principal

Signed by:  
  
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Dr. Michael Moritz  
Member of the Board of Directors  
COO Sauber Holding AG  
General Counsel of Sauber Group

Signiert von:  
  
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