

Supplier Code of Conduct

This Supplier Code of Conduct (hereinafter: “Supplier Code”) is based on the provisions of the Code of Conduct of Hamburg Commercial Bank AG (hereinafter: „Bank“) as well as applicable national and international laws, regulations, and recognized industry standards regarding integrity and responsibility towards people and the environment.

Compliance with this Supplier Code is a requirement for any business relationship with the Bank and aims to ensure responsible and legally compliant business practices throughout the entire supply chain.

In the event of violations of essential provisions, we reserve the right to demand appropriate remedial measures or to terminate the business relationship entirely.

The following sections specify expectations for collaboration.

I Compliance with Laws

The Bank expects its suppliers to conduct their business in accordance with all applicable national and international laws, regulations, and recognized industry standards.

II Conflict of Interests, Corruption and Bribery

Suppliers commit to disclosing situations or circumstances that may constitute or give rise to a conflict of interest.

Business activities must be conducted on the basis of fair competition. This includes refraining from offering, promising, granting, or approving monetary or personal benefits in exchange for preferential treatment in business dealings. Likewise, suppliers must not demand or accept personal benefits of value in interactions with business partners.

The interest of the Bank and the private interests of employees must be strictly separated in dealings with business partners (customers, suppliers) and public institutions. Decisions – especially purchasing decisions – must be made free from irrelevant considerations and personal interests.

III Competition and Antitrust laws

Suppliers respect fair competition and comply with all applicable laws that protect and promote it – particularly antitrust laws and other competition-related regulations.

Agreements and activities that influence prices or conditions, allocate sales territories or customers, or unlawfully restrict free competition are prohibited. Likewise, agreements between customers and suppliers that limit the freedom to set resale prices and conditions are not permitted.

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IV Employee Rights and Social Responsibility

Equal Opportunities and Non-Discrimination

Suppliers ensure equal opportunity and promote the professional development of all employees, regardless of ethnic origin, skin color, gender, age, religion, disability, marital status, pregnancy, sexual orientation, nationality, or other personal characteristics.

Discrimination, harassment, threats, and any hostile or abusive behavior in the workplace will not be tolerated.

Labor law

Suppliers provide fair compensation and guarantee compliance with statutory minimum wage and maximum working hours applicable in the respective country. Where legally permissible, they recognize employees' freedom of association.

They assume responsibility for the health and safety of their employees and implement appropriate preventive measures against accidents and occupational illnesses.

Environmental Protection

Suppliers comply with legal and international environmental protection standards and strive to minimize environmental impact. All business activities take ecological and societal effects into account.

Energy Management

Environmental protection is a core component of the Bank's corporate policy. The Bank operates an energy management system in accordance with DIN ISO 50001, aiming to continuously improve energy efficiency.

The Bank expects active support from its suppliers in optimizing energy use, consumption, and efficiency.

V Implementation, Changes, and Review

Suppliers are required to establish and maintain business practices that comply with or promote the provisions of this Supplier Code. They must also ensure that their subcontractors adhere to the requirements of the Supplier Code.

The Bank will regularly review the Supplier Code and reserves the right to make changes and communicate these to suppliers.

To ensure compliance, the Bank reserves the right to conduct supplier audits. Reasonable cooperation from the supplier during such review is expected.

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By signing below, we confirm that we have acknowledged the Supplier Code of Conduct in its version dated 01.09.2025.

Place, Date

First and Last Name

Company and Function

Signature