

TECE SE Code of Conduct

Supplier Code of Conduct

(August 2026)

"We are successful as a manufacturer of sanitary products and installation systems because we think in a forward-looking and innovative way.

In order to live up to our responsibility towards customers, employees, society and the environment, we at TECE SE want to make a measurable contribution to sustainable development."

TECE Board of Directors

Introduction/Preamble

TECE SE attaches great importance to humanity, reliability and honesty both in its dealings with planners, customers, suppliers and within the TECE team. Within TECE SE, the Code of Conduct forms the basis for our daily actions and sets out the binding values and rules of conduct for all employees. The Management Board of TECE SE is committed to actively exemplifying and promoting the values enshrined in this Code of Conduct ("Tone from the Top").

In addition, this TECE Code of Conduct plays a central role for our suppliers. We expect them to share our values and adhere to the principles set out in this Code of Conduct. These guidelines serve as a guideline for responsible and sustainable action along the entire supply chain.

We are continuously committed to optimising our business activities and our products or services in terms of sustainability, and we call on our suppliers to contribute to this in the sense of a holistic approach. The Supplier Code of Conduct is based on national laws and regulations such as the Supply Chain Due Diligence Act (LkSG) and international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Conduct, the United Nations Guidelines on Business and Human Rights, the International Labor Standards of the International Labor Organization and the United Nations Global Compact.

Note on language: For better readability, we will use the generic masculine in the following. This always means all genders equally. This formulation does not imply any evaluation or disadvantage.

1. Target group and scope

The Supplier Code of Conduct is a central part of our corporate culture and is comprehensively communicated to all suppliers who provide goods or services at the beginning of our cooperation. It covers all business activities, including the production, supply and processing of materials and components.

Every new supplier must comply with the Supplier Code of Conduct as an integral part of the cooperation, whereby the essential contents must be explained and acknowledgement and compliance must be confirmed in writing.

2. Compliance with laws and standards

Our suppliers are committed to complying with all applicable legal regulations, regulatory requirements, and industry-specific and international standards. This includes in particular, but not exclusively, regulations on occupational health and safety, environmental protection, the confidential treatment of business and personal data, fair working conditions, product safety and ethical business conduct.

Our suppliers have a responsibility to inform themselves about relevant laws and standards in their respective areas of activity and to ensure that their business practices comply with applicable regulations at all times.

Violations of legal requirements or standards can lead to the termination of the business relationship.

3. Social Responsibility

Our suppliers are responsible for the social impact of their business activities and are committed to creating fair working conditions and upholding the rights of their employees. This includes ensuring fair pay, promoting equality and respecting human dignity. They must prevent discrimination, exploitation and forced labour in any form and promote a working environment based on respect and cooperation. In addition, our suppliers actively contribute to the improvement and preservation of living conditions and ensure that no conflict minerals are used. Our suppliers respect the freedom of association of employees and ensure a transparent grievance mechanism for all parties involved.

Exclusion of forced labour

The suppliers of TECE SE ensure that no forced labor, slave labor or similar work is tolerated. All work must be voluntary and carried out without threat of punishment. Employees must be able to terminate work or employment at any time. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation. The commissioning or use of security guards is to be refrained from if persons are treated or injured inhumanely or degradingly during the operation or if the freedom of association is impaired.

Further information and notes can be found [here](#) on our homepage under "Modern Slavery Statement"

Prohibition of child labour

Our suppliers are committed to ensuring that child labor is not used at any stage of the supply chain. All suppliers are required to comply with the recommendation from the ILO conventions (International Labour and Social Standards) on the minimum age for employing children. According to this, the age of the employees should not be less than the age at which compulsory schooling ends under the law of the place of employment and in any case not less than 15 years. If children are found at work, the TECE staff member must document the measures to be taken to remedy the situation and enable the children to attend school.

TECE SE is committed to the protection and rights of young workers, whereby those under the age of 18 may not be used for work that is harmful to the health, safety or morals of children. The special protection regulations are of central importance in this regard.

Further information and notes can be found [here](#)

Fair pay

Compensation paid to our suppliers' workers must comply with all applicable compensation laws, including minimum wage or overtime laws. If the statutory minimum wage is not sufficient to cover the cost of living, suppliers are obliged to pay a fee that covers basic needs. Wage deductions as punitive measures are not permitted. The basis on which workers are remunerated is continuously announced to the employees in the form of a payslip.

Fair working hours

Our suppliers ensure that working hours comply with applicable laws, including overtime, vacations, and holidays. Overtime is only approved to a limited extent and with appropriate remuneration.

Freedom of association

TECE SE's suppliers respect the workers' right to freedom of association, to join trade unions, to appeal to workers' representatives or to be members of works councils in accordance with local laws. Workers must be able to communicate openly with management without fear of reprisals or harassment.

It ensures that workers are not discriminated against on the basis of establishing, joining or being a member of such an organisation. Workers' representatives should be given free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

Prohibition of discrimination

Our suppliers are committed to ensuring that persons are not discriminated against on the basis of gender, age, religion, caste, birth, social background, disability, health status, ethnic or national origin, nationality, membership in workers' organisations including trade unions, political membership or belief, sexual orientation, family obligations, marital status or any other situation that could result in discrimination, excluded or favoured. In particular, employees must not be subjected to harassment or disciplinary measures for the reasons mentioned above.

Health and safety at work

TECE SE's suppliers ensure a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may occur in connection with the activity.

Working hours, work organization and personnel deployment must be designed in such a way that health problems and excessive physical or mental fatigue are avoided. In addition, employees are regularly informed and trained about applicable health and safety standards and corresponding measures.

Employees are given access to drinking water in sufficient quantities as well as access to clean sanitary facilities.

Umgang mit Konfliktmineralien

Our suppliers establish processes for the conflict minerals tin, tungsten, tantalum and gold, as well as for other commodities such as cobalt, in accordance with the Organization for Economic Cooperation and Development (OECD) Due Diligence Principles to promote responsible supply chains for minerals from conflict-affected and high-risk areas.

They ensure that smelting and refining is avoided without appropriate, audited due diligence processes.

Grievance mechanisms

Our suppliers are responsible for establishing an effective grievance mechanism at the operational level. They ensure the protection of whistleblowers from retaliation.

4. Ecological responsibility

TECE SE expects its suppliers to conduct their business in an ecologically and socially responsible manner.

They must ensure that negative impacts on the environment and climate resulting from business activities are minimised, that natural resources are used carefully and that their consumption is reduced as much as possible. In particular, suppliers must ensure that their business activities do not cause harmful soil change, water pollution, air pollution, harmful noise emissions or excessive water consumption.

Treatment and discharge of industrial wastewater

Our suppliers ensure that wastewater from operations, manufacturing processes and sanitary facilities is typed, monitored, tested and, if necessary, treated before discharge or disposal.

In addition, measures are being introduced to reduce the generation of wastewater.

Dealing with air emissions

TECE SE expects its suppliers to standardize, routinely monitor, check and, if necessary, treat general emissions from operations (air and noise emissions) as well as greenhouse gas emissions before they are released.

They are committed to monitoring exhaust gas purification systems and are required to find cost-effective solutions to minimise any emissions.

Handling of waste and hazardous substances

Our suppliers avoid or reduce their waste volumes as well as emissions to air, water and soil. During disposal, the applicable legal requirements are complied with. Our suppliers also comply with the requirements of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989 in the current version must be observed. Chemicals or other materials that pose a hazard when released into the environment must be identified and handled in such a way as to ensure safety in the handling, transport, storage, use, recycling or reuse and disposal of such substances.

Mercury must be used in accordance with the prohibitions of the Minamata Convention of 10 October 2013 and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001 as amended.

Reduce consumption of raw materials and natural resources

Our suppliers reduce or avoid the use and consumption of resources during production as well as the generation of waste of all kinds, including water and energy.

This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or operations in the company, by using alternative materials, by saving, by recycling or by reusing materials.

Dealing with energy consumption/efficiency

Our suppliers monitor and document their energy consumption. They strive to improve energy efficiency and minimize energy consumption. This and the use of renewable energies are intended to reduce greenhouse gas emissions.

5. Ethical Business Conduct

Our suppliers are obliged to act with integrity, transparency and fairness. Corruption, bribery, fraud and unfair competition methods are strictly prohibited. All business practices must be documented in a comprehensible and lawful manner.

Fair competition

Our suppliers behave fairly in competition and comply with the applicable legal regulations that protect free competition. In addition, they do not enter into agreements or concerted practices with other undertakings which have as their object or effect the prevention, restriction or distortion of competition and do not unlawfully exploit any dominant position.

Integrity/Bribery, Corruption and Gifts

The highest standards of integrity must be applied to all business activities of our suppliers. Therefore, any form of bribery, corruption, extortion, granting of advantages, embezzlement or other undue influence is strictly prohibited. This also applies to offering, accepting or granting inappropriate gifts or invitations that could give the impression of dependence or influence.

Money laundering and terrorist financing

Suppliers must comply with their legal obligations to prevent money laundering and terrorist financing and must not directly or indirectly promote them.

Compliance with the Supply Chain Due Diligence Act

As part of their corporate responsibility, suppliers are obliged to comply with the requirements of the Supply Chain Due Diligence Act (LkSG). They must identify and document risks to human rights and the environment in their own supply chain and take appropriate countermeasures.

Confidentiality/Data Protection

The processing of personal data of employees and suppliers, i.e. the collection, storage, collection, use and provision, is only carried out in accordance with the applicable legal requirements. Suppliers must handle and protect any information in an appropriate manner. Data and information are used only according to their classification. Suppliers must ensure that data to be protected is properly collected, processed, secured and deleted.

Anti-Fraud

To combat fraud, suppliers undertake to document all business transactions correctly and completely and to establish internal control mechanisms to avoid manipulation and misrepresentation.

Export control

Suppliers are committed to complying with all applicable export control laws and international trade regulations. This includes, in particular, compliance with national and international export control regulations, including EU regulations, the Foreign Trade and Payments Act (AWG) and relevant US regulations (e.g. EAR, ITAR).

In addition, our suppliers ensure that no embargoes, sanctions or other trade restrictions are violated before delivering their products.

Trademark Law, Patents and Intellectual Property

Suppliers must respect the protection of intellectual property and observe it along the entire supply chain. This also applies to tangible property of TECE SE, which must be protected against loss, theft or misuse.

6. Grievance mechanism

Suppliers must pass on information received from TECE SE to their employees in an appropriate manner regarding accessibility, responsibility and the implementation of a complaint procedure. Indications of possible violations of legal regulations or internal rules can be reported confidentially and anonymously via our [whistleblower system](#) on our website.

The grievance procedure must be accessible to employees while maintaining identity confidentiality and effective protection against discrimination. Unless indicated, the supplier itself is responsible at the establishment level of an effective grievance mechanism for individuals and communities that may be affected by adverse impacts.

TECE SE investigates reported indications of possible misconduct. In order to learn about possible violations of the rules, we rely on suppliers and third parties to report possible misconduct. Reports of disregard for labor and human rights, violations of our ethical corporate principles, non-compliance with environmental requirements or other violations of our principles and guidelines can be reported to us through various channels.

Through our whistleblower system, we offer the possibility to submit information anonymously and securely in accordance with the Whistleblower Protection Act or by voluntarily providing your name and contact details.

Alternatively, the report can be sent to the Compliance Manager of TECE SE Germany:

Ms. Franziska Wehlmann, Manager Legal & Compliance, franziska.wehlmann@tece.de

Suppliers can direct questions about the Code of Conduct at any time to their responsible specialist buyer or Group Purchasing.

7. Implementation of the requirements

Compliance with requirements

The Supplier undertakes to comply with the requirements specified in this Code of Conduct in connection with its provision of services to TECE SE. We expect our suppliers to identify risks within supply chains and take appropriate action. In the event of a suspicion of violations or to secure supply chains with increased risks, the Supplier will inform the Company promptly and, if necessary, regularly about the identified violations and risks as well as the measures taken. TECE SE verifies compliance with the standards and regulations listed in this document by means of a self-assessment questionnaire and risk-based audits at suppliers' production sites. The Supplier agrees that TECE SE may carry out such audits once a year or on a specific occasion to verify compliance with the Code at the Supplier's business premises during normal business hours after reasonable advance notice by persons commissioned by the Supplier. The supplier may object to individual audit measures if they violate mandatory data protection regulations.

Legal consequences in the event of violations

If a violation of the provisions of this Code of Conduct is detected, the Client TECE SE shall immediately notify the Supplier in writing within one month and shall set a reasonable grace period for the Supplier to bring its conduct into line with these regulations. If a remedy is not possible in the foreseeable future, the supplier must notify this immediately and draw up a concept with a timetable for ending or minimizing the violation together with the company. If such a breach is culpable, the grace period expires fruitlessly or the implementation of the measures contained in the concept does not remedy the situation after the expiry of the schedule, and a continuation of the contract until the ordinary termination is unreasonable for the Client and no milder means are available, the Client may terminate the business relationship with TECE SE and terminate all contracts after the expiry of the set period without success, if he threatened to do so when setting the grace period. A statutory right to extraordinary termination without setting a grace period, in particular in the case of violations that are to be assessed as very serious, remains unaffected, as does the right to damages.

Supplier's implementation obligations

At the request of TECE SE, the Supplier shall participate to an appropriate extent in training and further education on the contents of the Code of Conduct.

The Supplier shall communicate the contents of the Code of Conduct in an appropriate manner to its suppliers whom it commissions in connection with the provision of its services for TECE SE (hereinafter referred to as the "Upstream Supplier"), and shall also take appropriate steps to ensure that the upstream suppliers also commit themselves to comparable values and principles and comply with them.

8. Acknowledgment and consent of the supplier

By signing this document, the supplier undertakes to act responsibly and to adhere to the listed principles/requirements. The Supplier undertakes to communicate the content of this Code to employees, agents and subcontractors in a way that is understandable to them and to take all necessary precautions for the implementation of the requirements.

Confirmation by the supplier:

We have received the framework conditions for cooperation and hereby undertake to comply with them in addition to our other contractual obligations.