

# **APCOA Parking Austria GmbH**

## **Supplier Code of Conduct**

**Version 1.0**

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## APCOA Parking Austria GmbH ('APCOA')

### SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct contains the key principles that apply to APCOA Parking Austria GmbH ('APCOA') and its subsidiaries to ensure it follows responsible social, environmental, and ethical practices throughout its operations.

#### 1. Purpose and Coverage

This Supplier Code of Conduct ('the Code') is intended for all those involved in APCOA's supply chain, including agencies, public bodies, and subcontractors. APCOA expects its suppliers to communicate this Code to their employees, their parent company, subsidiaries, and any party involved in the supply chain.

The overall objective of this Code is to strengthen the principles of working together and building open and trusting relationships. The Code is intended to help suppliers understand the standards and behaviours expected when working with APCOA and outlines fair, ethical, and respectful behaviour towards service users, employees, and subcontractors. In return, APCOA also expects our employees to treat suppliers with fairness and respect and to work jointly with suppliers to build trusting, collaborative, and constructive working relationships.

#### 2. General Principles, Laws and Statutes

The Supplier will uphold its societal responsibility in all business dealings. In all its business activities and decisions, the Supplier commits to respect the laws in effect and any other applicable requirements and/or obligations in the countries where it is active. Contracts shall be complied with, considering changes in the business environment. Business partners are to be treated fairly.

#### 3. Corruption and Competition Law

In dealing with business partners (customers, suppliers) and state institutions, the interests of the Company and the private interests of employees on both sides are to be kept strictly separate. Actions and (purchasing) decisions are to proceed independently of considerations that do not concern the business and involve personal interests. Current anti-corruption criminal law is to be upheld. Among other things, the following is to be observed:

##### Criminal Acts in Dealings with Public Officials

No one should be given personal benefits in connection with any matter. This includes benefits of any kind such as payments, e.g., loans (preferential interest rates), the giving of gifts, be they single large gifts or various smaller gifts over a longer period. This applies if the benefit was granted by the signatory and/or acceding companies or a third party (whether an employee of that Company) on their behalf to a public official (e.g., a civil servant or public employee) in order to provide benefits to the Supplier or his employee or a relative of his employee or a third party.

##### Criminal Acts in Business Dealings

No personal advantages may be offered, promised, granted, or approved in return for a preferential position in business dealings. No personal advantages may be demanded or accepted in dealings with business partners. In business dealings, the Supplier must prohibit its employees from accepting any such benefits and taking steps to avoid benefits being promised to them. The Supplier's officers, management, and employees are not allowed to offer, promise, demand, give or accept gifts, payments, invitations, or services. Especially if those things are provided to influence a business relationship in a prohibited way or with someone with whom there is the risk of jeopardising the professional independence of the business partner.

This general prohibition does not apply to gifts and invitations that fall within the bounds of regular business practice concerning hospitality, convention, and courtesy.

The Supplier will be expected to have a binding policy concerning the giving and receiving of gifts, invitations to business entertainment and events. This policy also seeks to designate a person who can be contacted if employees of the Supplier are in a situation where a conflict of interest exists or are unsure whether a conflict of interest exists or may arise.

#### Conduct vis-à-vis Competitors (Anti-trust Law)

The Supplier must respect the fair competition and comply with the requirements of existing laws on the protection and promotion of competition and the regulation of competition. In dealing with competitors, the Supplier must avoid collusion and other activities aimed at influencing prices or conditions, dividing up sales territories or customers or using prohibitive means to inhibit free and open competition. Also, the Supplier should not enter into agreements with its customers that restrict the customer's ability to determine their pricing and other conditions in any way when reselling their goods or services. Given the difficulty distinguishing between prohibited cartels and legitimate collaboration, the Supplier is expected to designate a person who can be contacted in case of doubt.

#### 4. Human Rights and Fair Treatment

The Supplier must respect and comply with all applicable human rights and employment laws in the local jurisdictions. The following requirements outline the minimum standards that APCOA expects from its suppliers and subcontractors in the supply chain. APCOA expects its suppliers to actively monitor and check the compliance of their supply chain with these requirements.

##### Discrimination

APCOA is committed to treating employees with respect and dignity both in the workplace and in our hiring and employment practices. Discrimination, harassment, and abuse are not acceptable.

APCOA expects its suppliers to commit to opposing all forms of discrimination. This applies to unfair treatment based on gender, race, disability, ethnic or cultural origin, religion, worldview, age, or sexual orientation.

##### Wages and working time

The Supplier must ensure that its workers comply with all applicable laws and mandatory industry standards relating to working hours and wages. Suppliers should pay their workers on time and under applicable national legal or industry benchmark standards.

Before employment, all workers must be provided with explicit written information regarding their employment conditions and wages and how these are paid. You must not make any deductions to a worker's wages in the way of a disciplinary measure unless permission is granted by the worker concerned.

##### Freedom of Association

Suppliers will observe and take an open attitude towards all applicable laws allowing workers the right and freedom to form or join a worker's council or other employee trade union body. Suppliers should allow any representatives to carry out their required functions or activities in the workplace without discrimination.

### Forced Labour

The Supplier should reject every use of forced or compulsory labour. Therefore, APCOA requires Suppliers to:

- Ensure that all work is conducted voluntarily and not under any penalty or sanction
- Not make use of any forced or compulsory labour in all its forms
- Not require any employees to make deposits or financial guarantees
- Not retain any identity documents (such as passports, identity cards, etc.)
- Not use any form of bonded labour where employees incur debt through recruitment fees, fines, or other means
- Allow employees to terminate their employment with reasonable notice; and
- Allow employees to leave the workplace after their shift has ended.

### Child Labour

Child labour means the employment of children in an industry or business, especially when illegal or considered exploitative. This includes work that is harmful to the child's health or physical, mental, spiritual, moral, or social development or interferes with the child's education.

APCOA is firmly committed to not engaging in or benefiting from the use of child labour. The Supplier must respect the regulations on human rights and, in particular, children's rights. As a result, the Supplier commits to complying with the minimum age for admission to employment and eliminating the worst forms of child labour.

Our suppliers shall:

- Not recruit or exploit children in any way
- Not otherwise make use of child labour in any part of its supply chain; and
- Comply with all applicable minimum age regulations for employment.

### Modern Slavery and Human Trafficking

We expect our suppliers to take all necessary steps to ensure that their operations and subcontractors and supply chain meet the standards that apply to anti-slavery and human trafficking laws.

### Inhumane Treatment

APCOA will not allow or tolerate any form of verbal or physical abuse, threats, sexual abuse or any form of harassment or intimidation against any worker.

## 5. Prohibitions and Sanctions

Prohibitions and Sanctions are restrictive measures that may be implemented to comply with obligations such as supporting local policies, security objectives or maintaining international peace.

APCOA follows guidance on the prohibitions and the requirements imposed by any regulations and expects our business partners and suppliers to do likewise. APCOA expects neither it nor any of its business partners are affected by or affiliated to any person to or in respect of which sanctions of the following types have been imposed:

- trade sanctions, including arms embargoes and other trade restrictions
- financial sanctions, including the freezing of assets
- immigration sanctions (also known as travel bans)
- aircraft and shipping sanctions, including de-registering or controlling the movement of aircraft and ships

If any of our business partners or suppliers identify a prohibited or sanction match, APCOA should be notified as soon as possible to allow for further investigations to be undertaken.

To report a sanction related issue, please get in touch with [connect@apcoa.at](mailto:connect@apcoa.at) or with our Whistleblower Hotline (see '9. Supplier Responsibilities').

## 6. Health and Safety

### Health Protection

Suppliers should guarantee the protection of workers in the workplace and comply with all applicable national provisions, laws, and regulations. Suppliers are expected to adopt practices to minimise health and safety risks, support accident prevention, and ensure a safe workspace. APCOA supports continuous advancement of this process towards improving the working environment.

Therefore, APCOA expects working conditions to protect the health and safety of employees, and in particular, our suppliers shall:

- Ensure working conditions that are safe, hygienic, and healthy for their employees
- Assess and take the relevant steps to prevent and minimise accidents and injuries
- Ensure that fire exits and essential safety equipment are accessible
- Ensure available access to emergency medical care
- Provide clean toilet facilities and drinkable water
- If appropriate, provide facilities for food storage
- Provide clean and safe accommodation meeting basic needs, where provided
- Provide any required personal protective equipment
- Conduct and record regular health and safety training for existing and new workers
- Document and verifiably analyse incidents where a worker is injured or could have been injured (near-miss) and take active steps to avoid a recurrence.

## 7. Social Responsibility

### Environmental Protection

APCOA aims to operate sustainably and minimise any environmental impacts caused by our activities, products, or services. APCOA expects the same of its suppliers.

Laws passed to protect the environment are to be obeyed, and suppliers must ensure compliance. The Supplier must support the environmentally-conscious actions of its employees. Therefore, Suppliers should commit to sustainably upholding the goal of environmental protection for present and future generations.

### Reputation

We expect our suppliers to maintain public trust, be protective of APCOA's reputation, and ensure that neither they nor any of their partners or subcontractors engage in any act or omission that is reasonably likely to diminish that trust.

## 8. Data privacy and security

Suppliers are required to protect the privacy of individuals and the security, confidential assets, and information of APCOA and our clients. Personal information provided by or on behalf of APCOA must only be used, accessed, and disclosed as permitted by existing agreements and applicable law. Suppliers must ensure that a process is in place to protect any data and personal information.

### Company Secrets, Confidential Information and Personal Information

Suppliers must commit their employees to safeguard trade and company secrets. It is forbidden to divulge confidential information and documents to third parties without proper authorisation or to provide other forms of access unless proper authorisation has been granted or the information is otherwise publicly available already.

**9. Supplier Responsibilities**

**Compliance**

The Supplier is called upon to communicate the principles of this Code to all relevant stakeholders. This includes promoting compliance with this Code with immediate suppliers, their parent companies, subsidiaries and any further involved party. They are expected to adhere to it and the obligations that result from it.

**Contraventions**

Suppliers must promptly report to APCOA any known or suspected breaches of this Code or related APCOA policies. The reports should be issued via our external APCOA Whistleblower Hotline SAFECALL (by telephone or e-mail).

<p><b>WHISTLEBLOWER HOTLINE</b> Contact Details:</p> <p><b>Phone:</b> All calls are free of charge 00800 723 322 55 (calls from <b>all</b> countries, except Sweden, UK, and Ireland) 1 800 812 740 (Ireland) 0800 915 1571 (UK) 0850 252 122 (Sweden) E-Mail: <a href="mailto:apcoa@SafeCall.co.uk">apcoa@SafeCall.co.uk</a> Web: <a href="http://www.SafeCall.co.uk/report">www.SafeCall.co.uk/report</a></p> <p>or directly by e-mail to the Group Investigation Office <a href="mailto:internalaudit@apcoa.eu">internalaudit@apcoa.eu</a></p>
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In case of non-compliance with this Code, APCOA may allow the Supplier to respond with proposed corrective actions. Should a violation be severe enough to breach the Law, APCOA retains the right to terminate its relationship with the Supplier.

To the extent that it is legally allowed, APCOA will confidentially keep any breaches reported.

**I confirm that I have read and understood the terms and key principles of APCOA's Supplier Code of Conduct.**

**Signed:** .....  
**Print:** .....  
**Position:** .....  
**For and on behalf of:** .....  
**Date:** .....