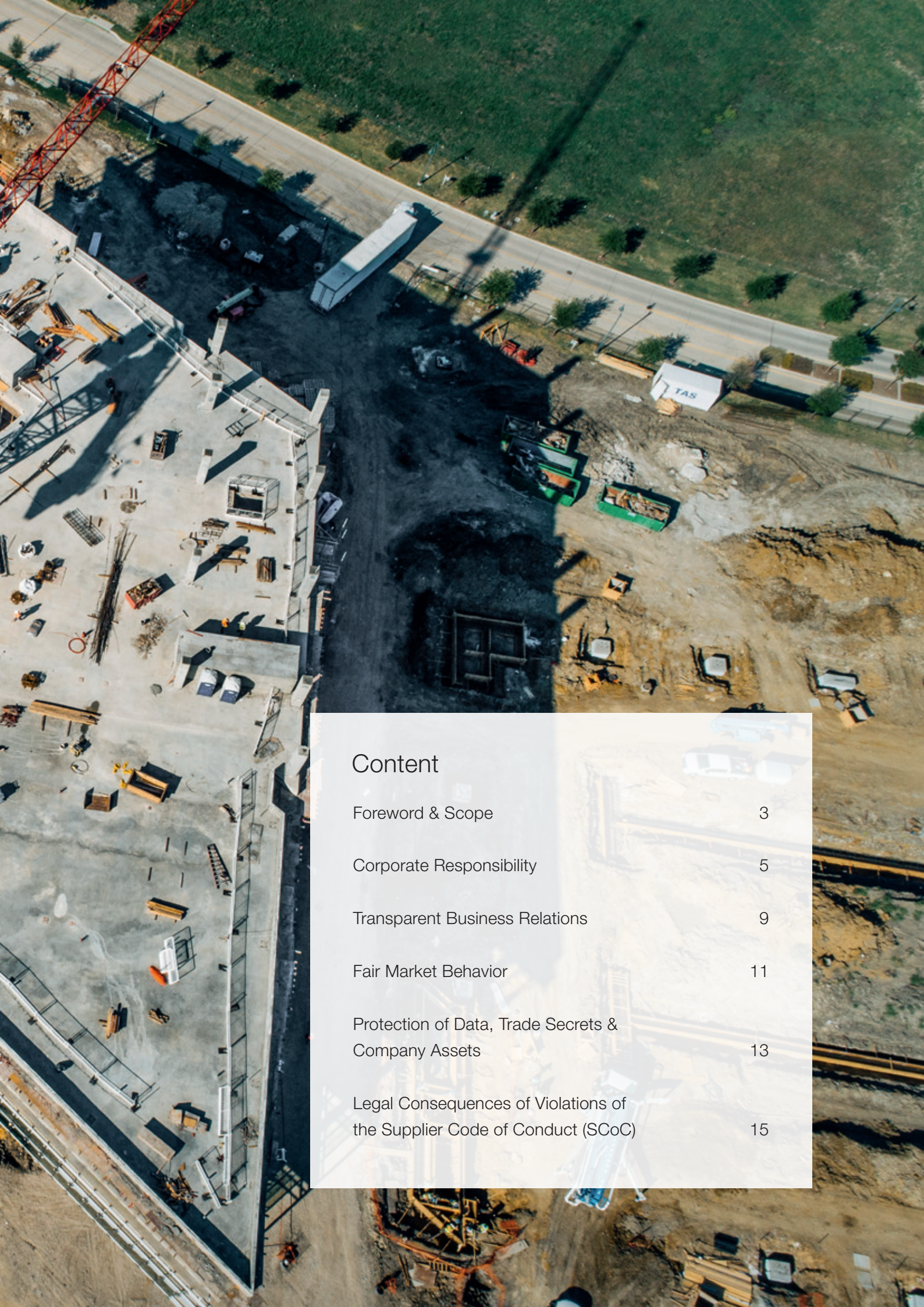


An aerial photograph of a large-scale construction project. The site is dominated by a large, multi-story building under construction, with a complex network of steel beams and concrete slabs. Several tall red tower cranes are positioned around the structure, and numerous yellow excavators and other heavy machinery are scattered across the site. The construction area is surrounded by a mix of dirt, gravel, and some greenery. In the upper left corner, a curved concrete wall borders a body of water. The overall scene is one of intense industrial activity.

**NEMETSCHEK
GROUP**

Supplier Code of Conduct (SCoC)
Suppliers & Business Partners



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Foreword & Scope

As an internationally active group, the Nemetschek Group bears corporate responsibility towards society and the environment. This corporate responsibility includes that the Nemetschek Group always complies with applicable laws and in all places, respects basic ethical values and acts sustainably.

The public image of the Nemetschek Group is shaped by the appearance, actions and behavior of employees¹ as well as suppliers² and business partners³.

Accordingly, the Nemetschek Group expects that its suppliers and business partners, as well as their employees, always act respon-

¹ The term “**Employees**” includes all workers of suppliers and business partners, including temporary and migrant workers, student workers, temporary workers, permanent workers and all other types of workers.

² The term “**Supplier**” shall be understood to mean any contractual partner who supplies the Nemetschek Group with product-specific goods, materials or services.

³ The term “**Business Partner**” refers to all partners with an intermediary or representative function. That is, all partners who are active in the interest of or on behalf of the Nemetschek Group in a sales-supporting capacity, e.g., consultants, intermediaries, agents, sales representatives, authorized dealers, importers, distributors, joint venture partners or consortium partners.

sibly and fully comply with the laws, rules and regulations of the countries in which they conduct business activities in all their activities. In addition, compliance with the principles of the UN Global Compact and the fundamental principles of the International Labor Organization (ILO) as well as the basic principles set out in this “Supplier Code of Conduct (SCoC)” is expected.

If the suppliers or business partners engage third parties (e.g. subcontractors or agents) as part of the business relationship, the Nemetschek Group expects that these third parties also commit to the basic principles set out in this “Supplier Code of Conduct

(SCoC)”. The suppliers and business partners will ensure through appropriate measures that the third parties comply with the requirements.

The Nemetschek Group reserves the right, in individual cases, to check compliance with the requirements specified in this “Supplier Code of Conduct (SCoC)” at the supplier's or business partner's premises by experts after prior notification and in the presence of representatives of the supplier or business partner, during regular business hours and in accordance with the respective applicable law, in particular in compliance with data protection laws.



Corporate Responsibility

Corporate responsibility results in the obligation to comply with applicable laws. The Nemetschek Group has established an appropriate procedure for ensuring human rights due diligence in its own business area and therefore expects its suppliers and business partners to comply with the following basic principles in particular:

Human Rights

The suppliers and business partners of the Nemetschek Group respect the globally applicable regulations⁴ for the protection of human rights as fundamental and generally applicable requirements and work towards this accordingly with their own business partners. This includes in particular that the

suppliers and business partners do not use forced labor or child labor in their value chain. Nor should they be directly or indirectly involved. In this respect, suppliers and business partners shall observe the regulations on the legal minimum age for the employment of children set out in the ILO principles.

⁴ Among others: UN Universal Declaration of Human Rights and ILO Declaration on Fundamental Principles and Rights at Work.

The brutal or inhumane treatment of employees is also inadmissible, including sexual harassment, sexual abuse, physical reprimands, mental or physical coercion and verbal assaults. This also applies to threats of such treatment.

Equal Opportunities & Anti-Discrimination

The suppliers and business partners of the Nemetschek Group do not discriminate against anyone (prohibition of discrimination⁵) on the basis of ethnic, national or social origin, skin color, gender, religion, world view, age, disability, sexual orientation, political attitude, insofar as this is based on democratic principles and tolerance towards those who think differently, or other legally protected characteristics, insofar as this does not conflict with mandatory law.

Freedom of Association & Communication

The suppliers and business partners of the Nemetschek Group recognize the fundamental right of all employees to form and join trade unions and employee representatives. Where this right is restricted by local laws, the suppliers and business partners of the

Nemetschek Group promote alternative, legally compliant possibilities of employee representation.

Employees of suppliers and business partners shall be able to communicate openly with the respective management without fear of discrimination, reprisals, intimidation or harassment and to raise ideas and concerns regarding working conditions and management practices.

Safety in the Workplace

The suppliers and business partners of the Nemetschek Group comply with the applicable legal requirements for health and safety at work. They support the further development and improvement of working conditions.

If employees are exposed to potential safety risks, these risks are to be identified, monitored and controlled. Appropriate protective equipment and training materials shall be provided to employees by suppliers and business partners. Suppliers and business partners shall have procedures and systems in place to prevent, manage, track and report occupational accidents and illnesses.

⁵ The prohibition of discrimination applies to all areas of professional interaction: including hiring and employment practices, e.g., compensation, promotions, and access to training opportunities.

Remuneration & Working Hours

The suppliers and business partners of the Nemetschek Group ensure appropriate remuneration (including comprehensible payroll accounting) for their employees, which at least corresponds to the legally valid and guaranteed minimum. If there are no legal or collective agreement regulations, the remuneration is based on the industry-specific, local collective agreement remuneration and benefits, which ensure an appropriate standard of living for the employees and their families. The suppliers and business partners of the Nemetschek Group also assure that the legal requirements regarding wage tax, social insurance, as well as residence and work permits are fulfilled for all employees working for them.

The suppliers and business partners of the Nemetschek Group also ensure compliance with the respective applicable working time regulations. Working hours may not exceed the maximum number of hours applicable under local law. To the extent required by local law, overtime worked by employees shall be compensated at a higher than nor-

mal hourly rate. If no national legal regulations exist, the international standards of the ILO shall apply.

Product Safety & Responsible Procurement

The suppliers and business partners of the Nemetschek Group observe all applicable product safety regulations and requirements.

The suppliers and business partners pay attention to responsible and sustainable procurement and ensure that, among other things, minerals in their products do not directly or indirectly lead to human rights violations or serve to finance or support armed groups. Suppliers and business partners should therefore exercise due diligence in their own supply chains and be able to disclose these due diligence measures to the Nemetschek Group upon request.

Environment & Climate

The Nemetschek Group would like to make a significant contribution to environmental and climate protection (sustainability). The Nemetschek Group expects suppliers and

business partners to comply with the following basic principles in particular:

The suppliers and business partners of the Nemetschek Group assume responsibility regarding environmental and climate protection issues and comply with all local legal requirements.

The suppliers and business partners of the Nemetschek Group use natural resources sparingly and minimize environmental pollution in their production processes and products. They contribute to the reduction of

energy consumption and CO₂ emissions as well as to the avoidance of environmental damage through appropriate processes and monitoring measures.

Complaints Office

If possible, suppliers and business partners shall establish a procedure through which violations of this “Supplier Code of Conduct (SCoC)” can be reported (anonymously) and shall ensure that all reports are processed confidentially.



Transparent Business Relations

Transparency is the key to credibility and trust in business dealings. The Nemetschek Group expects its suppliers and business partners to comply with the following basic principles in particular:

Avoidance of Conflicts of Interest

The suppliers and business partners of the Nemetschek Group make their decisions exclusively based on objective criteria and are not influenced by personal interests and relationships.

Prohibition of Corruption

The suppliers and business partners of the Nemetschek Group do not tolerate corruption. They ensure that their employees, sub-contractors or representatives do not grant, offer or accept bribes, kickbacks, inadmissible donations or other inadmissible pay-

ments or benefits to customers, public officials or other third parties. This also applies to so-called “Facilitation Payments” (e.g. illegal payments to expedite routine administrative matters).

Gifts, Hospitality & Invitations

The suppliers and business partners of the Nemetschek Group do not offer employees of the Nemetschek Group or third parties, either directly or indirectly, inappropriate advantages in the form of gifts, hospitality or invitations to exert undue influence. Nor do they solicit or accept such improper advantages.

Authorities

The suppliers and business partners of the Nemetschek Group comply with the strict legal requirements when dealing with governments, authorities and public institutions. When participating in public tenders they observe the respective legal requirements and the rules of free and fair competition.

Consultants & Intermediaries

The suppliers and business partners of the Nemetschek Group only use consultants or agents in accordance with applicable laws. In particular, they shall ensure that the remuneration paid to consultants or intermediaries is only paid for consulting and intermediary services actually rendered and that the remuneration is in an appropriate ratio to the service rendered.



Fair Market Behavior

The Nemetschek Group is a fair and responsible market participant and adheres to contractual obligations. The Nemetschek Group expects its suppliers and business partners to comply with the following basic principles in particular:

Fair Competition

The suppliers and business partners of the Nemetschek Group comply with the applicable antitrust and competition laws. In particular, they do not enter into any anti-competitive agreements with competitors, suppliers or customers and do not abuse any dominant market position that may exist.

Export Control

The suppliers and business partners of the Nemetschek Group ensure compliance with all applicable laws for the import and export of goods, services and information.

Money Laundering

The suppliers and business partners of the Nemetschek Group only maintain business relationships with partners whose integrity they are convinced of. They ensure that the applicable legal provisions against money laundering are not violated.

Business Information

The suppliers and business partners of the Nemetschek Group publish business data and report on their business activities truthfully and in accordance with the applicable laws.



Protection of Data, Trade Secrets & Company Assets

Confidential data, business secrets and company assets must be protected. The Nemetschek Group expects its suppliers and business partners to comply with the following basic principles in particular:

Data Protection

The suppliers and business partners of the Nemetschek Group comply with all applicable laws for the protection of personal data of employees, customers, suppliers and other data subjects.

Data Security

The suppliers and business partners of the Nemetschek Group observe and ensure sufficient and appropriate technical and organizational measures for the security of data.

Protection of Know-how, Patents, Trade and Business Secrets

The suppliers and business partners of the Nemetschek Group respect the know-how, patents, trade and business secrets of the Nemetschek Group and third parties. They shall not pass on such information to third parties in violation of the law or without the prior express written consent of the Nemetschek Group or in any other inadmissible manner.

Dealing with Company Assets

The suppliers and business partners of the Nemetschek Group respect the tangible and intangible assets of the Nemetschek Group and do not use these for unfair or non-business purposes. They shall ensure that their

employees as well as any third parties used by them within the scope of the business relationship (such as subcontractors or agents) neither damage the assets of the Nemetschek Group nor use them improperly – i.e. contrary to the interests of the Nemetschek Group.

Security of the International Supply Chain

The suppliers and business partners of the Nemetschek Group must ensure that the operating sites and handling locations at which the goods intended for the Nemetschek Group are produced, stored, processed, loaded and transported are protected against unauthorized access by third parties as part of a secure supply chain and that the personnel employed are reliable.



Legal Consequences of Violations of the Supplier Code of Conduct (SCoC)

If a supplier or business partner of the Nemetschek Group does not comply with the basic principles laid down in this “Supplier Code of Conduct (SCoC)”, the Nemetschek Group is entitled to terminate the business relationship with this supplier or business partner by extraordinary termination. It is at the discretion of the Nemetschek Group to abstain from such consequences and instead to take alternative measures if the supplier or business partner credibly assures and can prove that it has immediately initiated countermeasures to prevent future violations.

NEMETSCHek GROUP



NEMETSCHek SE

Konrad-Zuse-Platz 1
81829 Munich, Germany

Tel.: +49 89 540459-0

Fax: +49 89 540459-414

kontakt@nemetschek.com

www.nemetschek.com

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