

# Supplier Code of Conduct

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# 1. Preamble

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At Simon-Kucher, we stand for high quality consulting across all major industries around the world. Our clients and partners benefit not only from our expertise and knowledge but also from our people, who represent and live our core values.

Promoting high standards of conduct and performance as well as expecting the same in our regular dealings with our business partners is key to the success and future growth of

our business. We are committed to upholding the highest ethical and professional standards, fully in line with our fundamental values and our internal Code of Conduct.



## 2. Application of the Supplier Code of Conduct

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This Supplier Code of Conduct applies to all business partners, suppliers, and service providers (“Suppliers”) who perform services for Simon-Kucher, its subsidiaries, affiliated companies, or agents.

This Supplier Code of Conduct sets forth globally applicable minimum standards that must be observed and maintained in the business dealings of Simon-Kucher and its Suppliers. Both Simon-Kucher and its Suppliers commit themselves to this.

In the event of any conflict or ambiguity between any provision of this Supplier Code of Conduct and the provisions of any relevant contract with the Supplier, the provisions of the contract will apply.



# 3. Compliance with the law

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All Suppliers must adhere to this Supplier Code of Conduct as well as all applicable laws while conducting business with and/or on behalf of Simon-Kucher.

Suppliers shall implement an appropriate compliance management system that supports adherence to applicable laws, rules, and standards on a risk-based approach. Suppliers are obliged to promptly inform Simon-Kucher if a situation arises that causes the Supplier to operate in violation of this Supplier Code of Conduct or as specified within the contractual agreement with Simon-Kucher.

Suppliers are expected to self-monitor and demonstrate their compliance with this Supplier Code of Conduct. Simon-Kucher may require the immediate termination of any Supplier who behaves unlawfully or inconsistently with this Supplier Code of Conduct or any other obligation in any agreement a Supplier has with Simon-Kucher.







## 4. Ethical values and business integrity

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Suppliers shall operate and manage their businesses with integrity and in full compliance with applicable laws and regulations while conducting business with and/or on behalf of Simon-Kucher.

### **4.1 Creating awareness**

Suppliers shall ensure that their own employees develop the necessary awareness to act and behave with integrity and legality when they interact with Simon-Kucher's clients, have access to data, or are provided with confidential information. To ensure compliance with this Supplier Code of Conduct by Suppliers and their employees, Suppliers are required to take the necessary measures (e.g., regular employee training).

## 4.2 Anti-bribery and corruption

Simon-Kucher and its Suppliers are committed to conducting their business free from extortion, bribery, and all unlawful, unethical, or fraudulent activity. Simon-Kucher and its Suppliers shall comply with all applicable laws and regulations, including those with extra-jurisdictional application such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.



**In connection with doing business, Suppliers shall not offer, promise, authorize, give, demand, or accept any loan, fee, reward, or other advantage or receive such advantage from any person as an inducement:**

- ✗ to do something which is dishonest, illegal, or a breach of trust
- ✗ to obtain, retain, or direct business
- ✗ or to secure any other improper advantage.

Suppliers shall implement an anti-bribery and anti-corruption policy with measures to ensure that their employees, agents, and subcontractors comply with applicable anti-bribery and anti-corruption laws and/or standards.

#### **4.3 Protection of Simon-Kucher's goodwill**

Suppliers shall not at any time speak or act in any manner that is intended to, or does in fact, damage Simon-Kucher's goodwill, reputation or business, or the personal reputation of any of its partners, employees, clients, or Suppliers. Suppliers further agree that they shall not engage in any deprecating conduct or communications with respect to Simon-Kucher.

#### **4.4 Business information**

Suppliers shall honestly and accurately record and report all business information and comply with the applicable laws regarding their completion and accuracy. Suppliers shall create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements.

#### **4.5 Gifts, events, and hospitality**

Suppliers should avoid providing gifts or invitations of an inappropriate value to Simon-Kucher partners or employees, as even a well-intentioned gift might, under certain circumstances, constitute an allegation of bribery or create potential conflicts of interest. Suppliers shall not offer anything of value to obtain or retain a benefit or advantage for the giver and shall not offer anything that might appear to influence, compromise judgment, or obligate the Simon-Kucher employee. If offering a gift, meal, or entertainment to Simon-Kucher's employees, Suppliers must always use good judgment, discretion, and moderation.

Any gift from a Supplier must comply with applicable law, and be consistent with local custom and practice.







#### **4.6 Governance**

Suppliers shall comply with all applicable national and international trade laws and regulations. In particular, they shall comply with the rules of antitrust law, export control, applicable sanctions regulations, laws on data protection, protection of secrets and intellectual property, and all other laws applicable to them.

Suppliers shall have fulfilled and continue to fulfil the disclosure and registration obligations under registration law applicable to them. Neither the Suppliers themselves nor the management or owners known to Simon-Kucher are on sanctions or embargo lists that would prohibit them by law from entering into a business relationship.



# 5. Human rights and occupational health and safety

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Simon-Kucher expects from its Suppliers the same level of commitment to human rights and equal opportunity in the workplace, as well as such commitment to occupational health and safety. Suppliers shall conduct their employment practices in full compliance with all applicable laws and regulations.

## 5.1 Human rights

Suppliers must comply with all applicable laws and regulations that uphold the protection of human rights. In addition, Suppliers are prohibited from using forced labor, whether in the form of bonded labor, indentured servitude, or prison labor. Also prohibited is supporting any form of child labor and human trafficking involving involuntary labor through threats, violence, fraudulent claims, or other coercion.

## 5.2 Working environment

Suppliers are expected to integrate solid health and safety management practices into all aspects of their business. They shall provide a healthy and secure work environment and fully comply with all health and safety laws, regulations, and practices applicable in terms of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, and sanitation. Suppliers shall take adequate steps to minimize the causes of hazards inherent in the working environment.

## 5.3 No discrimination and harassment

It is Simon-Kucher's commitment that diverse business enterprises shall have equal opportunity to provide all goods and services and to become preferred suppliers for the organization. Simon-Kucher is committed to the development and growth of diverse business enterprises in order to build a better working world and to expand networks to build trusted and enriched relationships.



## Striving for a workplace that upholds human rights and equal opportunity and prioritizes health and safety is a testament to our values and unwavering commitment.

Simon-Kucher expects Suppliers to have equivalent policies to promote diversity in their supply chain, purchase from diverse businesses, and make a reasonable effort to utilize diverse suppliers. Suppliers shall cooperate with Simon-Kucher's commitment to a workforce and workplace free of harassment and unlawful discrimination.

Suppliers must not engage in discrimination in hiring, compensation, access to training, promotion, termination, and/or retirement based on race, color, sex, national origin, religion, age, disability, gender identity or expression, marital status, pregnancy, sexual orientation, political affiliation, union membership, or veteran status.

Suppliers shall not condone any form of harassment. This behavior can take many forms including verbal remarks, physical advances, bullying, and visual displays.

### **5.4 Working conditions**

Suppliers shall treat their employees fairly and with respect. Therefore, Suppliers shall comply with all applicable wage, benefit, and hour laws and regulations, and shall not require employees or contractors to work more than the maximum work week hours established by local law, including overtime, except in extraordinary business circumstances and with the consent of the individual. Suppliers shall pay employees at least the minimum wage required by applicable laws and regulations and provide the required benefits. Suppliers shall compensate employees for overtime hours at the rate required by applicable laws and regulations.

Suppliers shall comply with all local and national minimum working age laws and regulations and not use child labor.

Suppliers support the freedom of association of their workforce and the right to collective bargaining. Suppliers shall allow their employees to associate with others, form and join (or not join) organizations of their choice, and bargain collectively without interference, discrimination, sanction, or harassment, in accordance with locally applicable laws.





## 6. Environmental protection

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Simon-Kucher believes environmental stewardship is essential to the sustainability of our business and to the health of the communities in which we live and work.

Simon-Kucher expects that its Suppliers shall comply with all applicable environmental laws, regulations, and standards. In particular, Suppliers must strive to comply with the sustainability principles set out in this Supplier Code of Conduct in their upstream supply chain.

Suppliers shall support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly procedures and technologies.



# 7. Social responsibility and social environment

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Simon-Kucher is committed to social responsibility. In doing so, we prefer to work with suppliers who show a responsible and sustainable commitment to their social environment.

Suppliers must make ethical decisions that have a positive impact on society. They must consider how their actions affect communities in order to build long-term, trusting relationships. Suppliers should respect local customs, make positive contributions and act as responsible neighbors in their communities.



# 8. Protection of firm assets, intellectual property, and data

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It is essential for your Suppliers to protect Simon-Kucher's assets and intellectual property rights. Simon-Kucher, as a consulting firm, depends on its intellectual property, such as information, processes and technologies, know-how, experience, and expertise.

When authorized by Simon-Kucher to use its assets, Suppliers shall protect and responsibly use Simon-Kucher's physical and intellectual assets, including intellectual property, tangible property, supplies, and equipment with confidentiality and integrity.

Further, Suppliers shall comply with Simon-Kucher's requirements for safeguarding data as outlined in the contractual agreement as a condition of providing goods or services or receiving access to Simon-Kucher's internal corporate network, systems, and buildings.

Suppliers shall comply with Simon-Kucher's intellectual property ownership rights (e.g., copyrights, patents, trademarks, trade secrets), and manage the transfer of technology and know-how in a manner that protects intellectual property rights.

In addition, Suppliers shall ensure compliance with applicable legal requirements providing for the protection, transfer, access, and storage of personal information, including the General Data Protection Regulation (GDPR). Suppliers shall secure Simon-Kucher's data against unauthorized access and use, and not re-use Simon-Kucher's personal data for

their own business purposes without prior permission. Suppliers shall recognize that any use, sharing, or retention of personal data must be supported by, or based on, consent or another legal basis and compliant with the legal data protection principles.



# 9. Reporting misconduct, questionable behavior, and violations

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If a Supplier wants to report misconduct, questionable behavior, or violations of this Supplier Code of Conduct or any other regulation in the context of Simon-Kucher's business relationships they became aware of, Simon-Kucher invites them to submit a report via email to: [compliance@simon-kucher.com](mailto:compliance@simon-kucher.com)

Simon-Kucher will maintain confidentiality to the extent possible and in accordance with EU legal requirements and will not tolerate any retaliation taken against any individual who has, in good faith, reported potential misconduct, alleged questionable behavior, or a possible

violation of this Supplier Code of Conduct. Further, Suppliers encourage their employees or agents to speak up in the event of misconduct, questionable behavior, and violations within or affecting Simon-Kucher's organization.





## 10. Quality assurance

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As the manufacturer, importer, or upstream participant in the supply chain, the Supplier is responsible for ensuring that the goods delivered meet the legal requirements with regard to production processes, composition,

quality, labelling, packaging, and others. If the products do not meet the applicable requirements and are therefore not marketable, this constitutes a defect in quality for which Simon-Kucher will assert warranty rights.





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Thank you for taking your compliance responsibilities seriously.

For who we are and who we want to be, let's get this right.

A stylized, handwritten signature in white ink, consisting of a large, sweeping loop followed by a horizontal line.

Mark Billige  
CEO

A handwritten signature in white ink, featuring a series of connected, fluid strokes.

Andreas von der Gathen  
CEO





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Dirk Sievert,  
General Counsel and Head of Compliance

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