

*Always in front!*

# Corporate Social Responsibility (CSR) & Sustainable Procurement



Responsible for content:

## 1. Preamble

HBPO is the world market leader for highly integrated front-end modules (FEM). As an automotive supplier, we are leaders with our knowledge and experience in the development, design, assembly and logistics of module solutions.

In order to meet increased customer requirements concerning quality, response capacity and flexibility, HBPO is setting high benchmarks for its own quality requirements and performances. At the end of the day, optimum supplier products and performances are a prerequisite for the fulfilment of these requirements. For this reason, we rely on long-term partnerships with our regional and global supplier partners. Thanks to the close cooperation and the related increasing exchange of optimisation potentials, we are developing future-oriented solutions and products and thus creating mutual synergies.

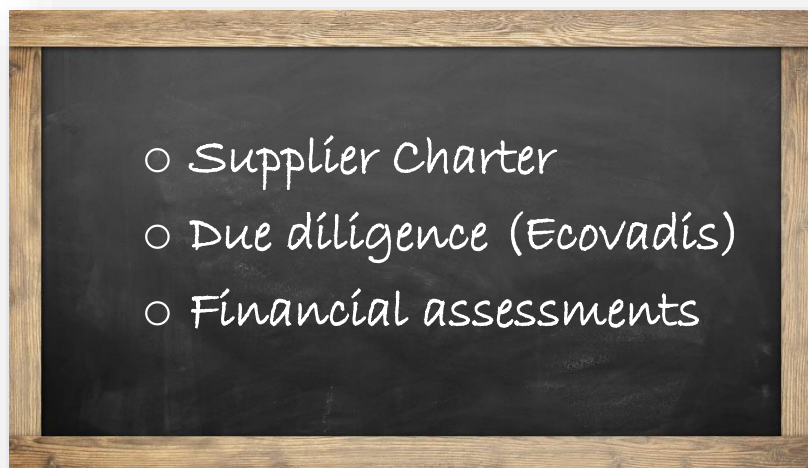
HBPO understands the importance of its Supply Chain impact in the current and future business and through our process it is asked to all suppliers to endeavor to comply with international legislations and social responsibility (no forced labor, child labor, hidden discrimination and the respect for human rights, ethics). They shall conduct their activities in accordance with the principles of loyalty, integrity and equity to ensure constant compliance with all laws and regulations fighting against corruption, money laundering and anti-competitive practices or conduct.

By acting responsible in collaboration with our suppliers, we aim to minimize risks and create stable, long-term business relationships with our partners.



Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	2 of 13

To assure sustainable procurement and Corporate Social Responsibility (CSR) within our supply chain we have established the following three pillars:



The scores obtained by the suppliers on mentioned pillars, enable the purchasing department to detect risks within the supply chain and to steer purchasing activities in a more strategical and sustainable manner.

## 2. Scope

This sustainable purchasing guide is a "Guideline" which aims to ensure that the way we conduct business with our suppliers is in line with environmental, social, ethical and sustainable standards, helping the buyers & suppliers to understand how the Group Governance and expectation of HBPO through the full supply chain.

It is understood by HBPO that the Corporate Social Responsibility needs to be taken on global purchasing actions and should be part of our global performance as assessed by our own clients.

Purchasing objective is to screen suppliers based on defined supplier portfolio agreed by Purchasing & Procurement HQ and the Supplier Manager of the different HBPO regions.

Even not having direct relationships with raw material supplier, HBPO starts the assessments of these companies in case these are partners of our direct supplier. These assessments will be conducted as described in the following chapters.

Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	3 of 13

## 3. Responsibility

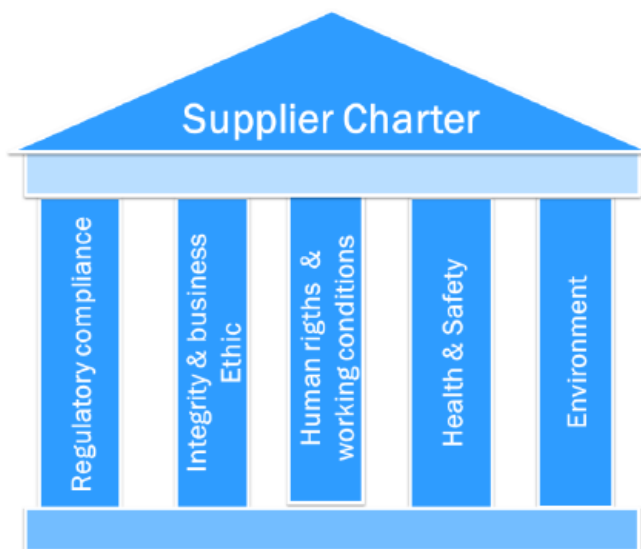
Purchasing & Procurement HQ is responsible for the creation and maintenance of this guideline.

The central Supplier Manager of every region (North America, Asia and Europe) are responsible for the supplier assessments within each region.

## 4. Our three pillars on Corporate Social Responsibility & Sustainable Procurement

### 4.1. Supplier Charter

It is mandatory for the supplier to sign the supplier charter before any business award. This need is pointed out in our General Purchasing Conditions as well. The objective of this Charter is to express the expectations of HBPO with regards to its Suppliers (current or potential) in terms of CSR. The supplier charter itself is based on following five pillars:



Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	4 of 13

HBPO asks its suppliers to endeavour to comply with international regulations pertaining to the refusal of forced labour, child labour, concealed work discrimination and to respect human rights and conduct activities in accordance with the principles of loyalty, integrity and equity to ensure strict compliance at all times with all laws and regulations against corruption, money laundering and anti-competitive practices or conduct.

HBPO's aim is to have all of its key suppliers adhering to this approach by signing the Supplier Charter

In case a supplier is not able or not willing to sign the charter but is able to prove at least an equal level of content, the related documents will be evaluated by our Legal Department.

## 4.2. Due diligence

HBPO understands the approach of CSR initiatives and its responsibility to break down related requirements into the supplier chain.

To meet this approach HBPO has launched a campaign with a third party (Ecovadis) to start the process of screening suppliers regarding due diligence topics. This process will allow us to select the most appropriate suppliers, in compliance with our values and ensure full compliance in the provision of services and products according to the code of conduct and the agreements set between HBPO and suppliers.

Safety, Ethics and Quality are priority and non-negotiable and the suppliers are expected to comply with our requirements and develop a corporate sustainability responsibility mindset beyond the relation within HBPO.

To achieve this aim, our suppliers get screened in following areas:

<p><b>I. ENVIRONMENT</b></p> <ul style="list-style-type: none"> <li>Environment policy</li> <li>Energy Consumption &amp; GHGs</li> <li>Water</li> <li>Biodiversity</li> <li>Local &amp; Accidental Pollution</li> <li>Materials, Chemicals, &amp; Waste</li> <li>Product Use</li> <li>Product End-of-Life</li> <li>Customer Health &amp; Safety</li> <li>Environmental Management Systems</li> </ul>	<p><b>II. LABOR &amp; HUMAN RIGHTS</b></p> <ul style="list-style-type: none"> <li>Policy labor practices &amp; human-rights</li> <li>Employee Health &amp; Safety</li> <li>Working Conditions</li> <li>Social Dialogue</li> <li>Career Management &amp; Training</li> <li>Child Labor, Forced Labor &amp; Human Trafficking</li> <li>Diversity, Discrimination &amp; Harassment</li> <li>Human-Rights Management Systems</li> </ul>	<p><b>III. ETHICS</b></p> <ul style="list-style-type: none"> <li>Corruption &amp; bribery</li> <li>Conflict of interests</li> <li>Frauds</li> <li>Money laundering</li> <li>Information security</li> <li>Anticompetitive Practices</li> <li>Responsible Information Management</li> </ul>	<p><b>IV. SUSTAINABLE PROCUREMENT</b></p> <ul style="list-style-type: none"> <li>CSR initiatives, for example: <ul style="list-style-type: none"> <li>- Responsible Mineral initiative</li> <li>- World Gold Council</li> <li>- PPA, IPC, iTSCi, etc.</li> </ul> </li> <li>Supplier Environmental Practices</li> <li>Supplier Social Practices</li> <li>Conflict minerals</li> <li>REACH</li> </ul>
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Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	5 of 13

The suppliers are requested to upload related documentations to prove the content of CSR initiatives and principles. The upload of documents and quality of content referring to specific assessment points have an impact on their final scoring.

The complexity of assessment depends on company branch and size. The following assessment content is an example based on a big automotive company.

## I. Environment

Suppliers and sub-suppliers are requested to adopt sustainable environmental practices that facilitate and foster a conscious use of resources and raw materials. Thereby suppliers should focus their efforts on keeping energy consumption and the use of resources as low as possible. The environmental assessment consists of:

1. **Environmental policy**
  - Environmental management system certification
  - Energy Consumption and Greenhouse gases
  - Water
  - Biodiversity
  - Local Pollution
  - Materials, Chemicals and Waste
  - Environmental impacts from use of products
  - Environmental impacts from Products End-of-Life (e.g. recycling of products)
  - Customer Health and Safety
  - Promotion of Sustainable Consumption
  
2. **Reduction of energy consumption and the emissions of GHG**
  - Employee awareness/training program on energy conservation
  - Purchasing of renewable energy
  - Production of renewable energy (e.g. solar, wind, biomass)
  - Reduction of energy consumption through technology or equipment upgrades COGENERATION in several German sites
  - Reduction of GHG emissions through technology or equipment upgrades
  - Process optimization to reduce emissions of GHGs
  - Measures to reduce CO2 emissions from transport
  - Measures to reduce energy consumption of IT infrastructure
  - Measures implemented to offset GHGs emissions (e.g. purchasing verified carbon credits)
  - Energy audit or carbon assessment performed
  
3. **Water management**
  - Reduction of water consumption through employees awareness program or innovative work practices
  - Reduction of water consumption through innovative equipments or technologies
  - Infrastructures implemented to enable significant recycling of water
  - Measures implemented to reduce pollutants rejected into water
  - Removal of hazardous compounds from waste water streams (if applicable)
  - Control measures to monitor and/or prevent contamination of groundwater

Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	6 of 13

#### 4. Local pollution

- Response procedure in place for emergencies (e.g. oil spill)
- Regular soil testing to check soil contamination of heavy metals (e.g. lead, arsenic, mercury, selenium, cadmium)
- Measures in place to control or minimize odor generated from operation (if applicable)
- Measures to reduce noise level (e.g. fleet, manufacturing sites)
- Measures to avoid emissions of dust/particles (if applicable)

#### 5. Hazardous materials and chemicals

- Identification of more eco friendly materials for processing (if applicable)
- Company wide work processes for labeling, storing, handling and transporting hazardous goods and chemicals
- Measures to ensure enclosure of emission sources and airtightness of equipment.
- Mass balances for VOC, CHCs, COD and analysis of waste streams
- Implemented VOC treatment techniques
- Implemented process for recovery/abatement of NOx
- Work process or innovative technologies implemented to reduce, recycle or reuse hazardous waste
- Work process or innovative technologies implemented to treat hazardous waste or facilitate clean disposal

#### 6. Implementation company's Product End of Life policy

- Measures to not mix plastics and limit the integration of steel or aluminum elements into the plastic packaging
- Information (on the packaging itself) of the type of plastic used in order to facilitate recycling
- Products designed for easy recyclability
- Company specific recycle programs (e.g. infrastructure or formal partnership established)

#### 7. Customer health and safety policy

- Company specific awareness program and detailed information to customers on health and safety issues associated with products/services
- Company specific emergency preparedness and response procedure, including call back process if applicable
- Company processes and facilities to collect external feedback on health and safety issues
- Company specific research or use of chemical database (e.g. Cleangredients, HPV) to identify potential health impacts of products/services
- Provision of Safety Data Sheets (SDS)
- Formalized process to assess and document risks related to customer health and safety (e.g. considering start-up of new operations, change of operations and/or periodic review of risks related to current activities)

#### 8. KPI's on company operations

- % of the total workforce across all locations who received training (internally or externally) on environmental issues
- % of all operational sites for which an environmental risk assessment has been conducted
- Other indicator on the % of the deployment of environmental actions throughout all company operations
- Further KPI's on:
  - Water
  - Biodiversity
  - Local & Accidental Pollution
  - Materials, Chemicals & Waste
  - Product Use
  - Product End-of-Life
  - Customer Health & Safety
  - Environmental Services & Advocacy
  - Total energy consumption in MWh
  - Total gross Scope 1 and Scope 2 GHG emissions in tons of CO2 eq
  - Total water consumption in liters, if applicable
  - Total weight of hazardous waste in tons, if applicable
  - Total weight of non-hazardous waste in tons
  - Use of recycled materials by your company
  - Percentage of operational facilities certified ISO 14001, EMAS or against other environmental management standard

Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	7 of 13

## II. Labor & Human rights

Our supplier and service provider are expected to comply with international regulations pertaining to the refusal of forced labour, child labour, concealed work discrimination and to respect human rights. The screening on the chapter refers to following topics:

### 1. Policy on labor practices or human rights

- Employees health and safety (e.g. management of employees health and safety issues)
- Labor and human rights management system certifications
- Working Conditions (e.g. wages & working benefits, working hours, exchange of information and participations on working conditions)
- Labor Relations (e.g. structured relations with employee representatives / trade unions)
- Career Management (e.g. management of recruitment, training & career development)
- Child and Forced Labor (e.g. engagements or measures taken to prevent or eradicate child or forced labor)
- Diversity, Discrimination & Harassment
- External stakeholder human rights
- Check if health & safety policy also covers activities carried out by subcontractors

### 2. Actions regarding employee health and safety

- Health and safety detailed risk assessment
- Procedure in place to anticipate health & safety risks related to change of operations (e.g. start-up of new operations, change of operations)
- Provision of protective equipment to all impacted employees
- Specific procedures for handling of chemicals or hazardous substances
- Health and Safety procedures translated in major languages spoken by employees
- Joint labor management health and safety committee in operation
- Active preventive measures for stress and noise
- Training of all relevant employees on health and safety risks and good working practices
- Mandatory health check up for all employees
- Training on health and safety issues for subcontractors working on premises (if applicable)
- Regular inspection or audit to ensure safety of equipment

### 3. Actions regarding working conditions

- Interactive communication session with employees regarding working conditions
- Compensation for extra or atypical working hours
- Additional leave beyond standard vacation days
- Flexible organization of work available to employees (e.g. remote work, flexi-time)
- Childcare services or allowance
- Health care coverage of employees
- Remuneration process (e.g. salary grid, procedure for salary advancement) communicated to employees
- Employee satisfaction survey
- Employee stock ownership plan (not restricted to executive level)
- Bonus scheme related to company performance
- Granting of special remuneration / time off for overtime worked (company wide)
- Granting of paid annual vacation (company wide)
- Employees receive 24 hours rest within a time frame of 7 consecutive days (company wide)
- Check if people under 18 are working or living on any of the production sites exposed to risks from chemicals, pesticides, machines or tools, dust or excessive cold, heat or noise

Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	8 of 13



#### 4. Social dialogue

- Employee representatives or employee representative body (e.g. works council)
- European Works Council in place
- Collective agreement on employees' health & safety
- Collective agreement on working conditions
- Collective agreement on training & career management
- Collective agreement on discrimination and/or harassment
- Request of feedback if workers have the right to join labor unions, workers' councils, or other collective bargaining organizations

#### 5. Training and career management

- Transparent recruitment process (communicated clearly and formally to all candidates)
- Regular assessment (at least once a year) of individual performance
- Setting of Individual development and career plan for all employees
- Official measures promoting career mobility
- Provision of skills development training
- Official measures to anticipate or reduce layoffs and associated negative impacts (e.g. financial compensation, out-placement service)

#### 6. Actions to address child labor, slavery and/or human trafficking

- Risk assessments performed to identify operations exposed to potential child and/or forced labor
- Awareness training on child labor, slavery and/or human trafficking
- Auditing of internal controls to prevent child and/or forced labor
- Formal collaboration with local NGOs to address child and/or forced labor issues
- Remediation procedure in place for identified cases of child and/or forced labor
- Whistleblower procedure on child or forced labor issues
- Other proactive measures to prevent child and/or forced labor

#### 7. Prevention of discrimination and harassment

- Proactive measures to prevent discrimination during recruitment phase
- Awareness training to prevent discrimination and/or harassment
- Measures for the integration of employees with disabilities
- Whistleblower procedure on discrimination and harassment issues
- Measures to promote wage equality in the workplace (e.g. equal pay monitoring)
- Measures to prevent discrimination
- Measures to promote a gender/minority inclusive environment
- Measures for the integration of senior employees
- Remediation procedure in place for identified cases of discrimination and/or harassment

#### 8. KPI's on company's actions throughout all company operations/workforce

- Lost time injury (LTI) frequency rate for direct workforce - (total number of lost time injury events) x 1,000,000 / total hours worked company wide
- Lost time injury (LTI) severity rate for direct workforce - (number of days lost due to injuries) x 1,000 / total hours worked
- Training hours per employee
- Percentage of workers from minority groups and/or vulnerable workers employed in relation to the whole organization (if applicable)
- Percentage of workers from minority groups and/or vulnerable workers in top executive positions (excluding boards of directors) (if applicable)
- Percentage of women employed in relation to the whole organization
- Percentage of women in top executive positions (excluding boards of directors)
- Percentage of operational facilities that are ISO 45001/OHSAS 18001

Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	9 of 13

- Further KPI's on:
  - Employee Health & Safety
  - Working Conditions
  - Social Dialogue
  - Career Management & Training
  - Child Labor, Forced Labor and Human Trafficking (if applicable)
  - Diversity, Discrimination & Harassment
  - External Human Rights Issues (if applicable)

### III. Ethics

The supplier shall conduct their activities in accordance with the principles of loyalty, integrity and equity. Following topics are part of the screening:

#### 1. Policy in regards to ethics

- Anti-corruption and bribery
- Conflict of interest
- Fraud
- Money laundering
- Anti-competitive practices
- Information security
- external certifications related to business ethics issues (ISO 27001, anti-corruption certification schemes [e.g. Ethic Intelligence, Trace, etc], others)

#### 2. Actions to prevent corruption and bribery

- Awareness training performed to prevent corruption and bribery
- Third party anti-corruption due diligence program in place
- Whistleblower procedure for stakeholders to report corruption and bribery
- Periodic corruption and bribery risk assessments performed
- Audits of control procedures (e.g. accounting, purchasing etc.) to prevent corruption and bribery
- Specific approval procedure for sensitive transactions (e.g. gifts, travel)

#### 3. Actions to prevent anti-competitive practices

- Awareness training performed to prevent anti-competitive practices
- Whistleblower procedure for stakeholders to report anti-competitive practices
- Periodic anti-competitive practices risk assessments performed
- Audits of control procedures to prevent anti-competitive practices
- Provision of competitor interaction guidelines to key employees

#### 4. Actions regarding information security

- Awareness training to prevent information security breaches
- Third party information security due diligence program in place
- Whistleblower procedure for stakeholders to report information security concerns
- Periodic information security risk assessments performed
- Audits of control procedures to prevent information security breaches
- Incident response procedure (IRP) to manage breaches of confidential information
- Implementation of a records retention schedule
- Measures to protect third party data from unauthorized access or disclosure
- Measures for gaining stakeholder consent regarding the processing, sharing and retention of confidential information

Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	10 of 13

## 5. KPI's related to ethics

- Percentage of total workforce trained (e.g. through e-learning) on business ethics issues
- Number of reports related to whistleblower procedure
- Number of confirmed incidents or legal actions reported
- Percentage of all operational sites for which an internal audit/risk assessment concerning business ethics issues has been conducted
- Percentage of all operational sites with certified anti-corruption management system
- Percentage of all operational sites with an information security management system (ISMS) certified to ISO 27000 (or other equivalent/similar standard)

## IV. Sustainable Procurement

The screening in that area covers following topics:

### 1. Policies regarding sustainable procurement

- Sustainable procurement policy on environmental issues, and/or labor practices and human rights
- Check if there is any tin, talum, tungsten, or gold remaining in the product that companies manufactures, subcontracts, or sells
- Policy related to "conflict minerals" (tin, tungsten, tantalum, gold)

### 2. Adherence to CSR initiatives or sets of principles

- Responsible Minerals Initiative (RMI, formerly CFSI)
- World Gold Council (Conflict-Free Gold Standard)
- Public-Private Alliance for Responsible Mineral Trade (PPA)
- Association Connecting Electronics Industries (IPC)
- JEITA's Responsible Minerals Trade Working Group
- Responsible Jewellery Council
- ITRI's Tin Supply Chain Initiative (iTSCi)
- The London Bullion Market Association
- Responsible Artisanal Gold Solutions Forum (RAGS)
- European Partnership for Responsible Minerals

### 3. Conflict mineral risk in supply chain

- Detailed conflict minerals risk analysis (per product or purchasing category) for downstream companies (e.g. manufacturers)
- Selected suppliers required to fill Conflict Minerals Reporting Template (CMRT)/other customized conflict mineral-related questionnaire
- Investigation or traceability system of upstream actors (smelters, trades, mines) on conflict minerals due diligence (e.g. third party on-site audit in place)
- Procedure to disengage with a non responding supplier (after several attempts) on conflict minerals issues (i.e. escalation steps)
- Grievance mechanism allowing any interested parties to voice and record concerns
- Formal project or partnership with NGOs regarding conflict minerals (e.g. Enough Project, Pact, Global Witness)
- Written communication sent to suppliers informing them of Conflict Minerals issues
- Capacity building of suppliers on conflict minerals issues
- Conflict Minerals taken into account in the supplier selection process
- Inclusion of conflict minerals clauses in contractual agreements
- Due diligence report on conflict minerals

Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	11 of 13

#### 4. Actions regarding the integration of social or environmental factors within procurement

- Supplier CSR code of conduct
- Integration of social or environmental clauses into supplier contracts
- CSR risk analysis (i.e. prior to supplier assessments or audits)
- Supplier assessment (e.g. questionnaire) on environmental or social practices
- Training of buyers on social and environmental issues within the supply chain
- On-site audits of suppliers on environmental or social issues
- Capacity building of suppliers on environmental or social issues (e.g. corrective actions, training)
- Performing suppliers on environmental and social issues have access to unique incentives (e.g. supplier awards, preferred supplier program, access to RFPs)
- Sustainable procurement objectives integrated into buyer performance reviews
- Worker voice surveys or other advanced supplier monitoring practices (e.g. second tier audits)
- Request for certification regarding sustainable procurement
- Request for formal assessment of company's suppliers progress with regards to the REACH regulation

#### 5. KPI's related to sustainable procurement

- Percentage of targeted suppliers that have signed the sustainable procurement charter/supplier code of conduct
- Percentage of targeted suppliers with contracts that include clauses on environmental, labor, and human rights requirements
- Percentage of targeted suppliers that have gone through a CSR assessment (e.g. questionnaire)
- Percentage of targeted suppliers that have gone through a CSR on-site audit
- Percentage of buyers across all locations who have received training on sustainable procurement
- Scope 3 GHG emissions of suppliers' supply chain
- Percentage of suppliers for which information regarding conflict minerals is available

### 4.3. Suppliers' financial stability

To assure relationships with reliable, financial partners, HBPO performs financial assessments of its suppliers. The financial figures, as well as the complete company structures are taken from a financial third-party tool providing transparency on the financial stability.

The tool captures for example the following data:

- information on companies in all countries
- public and private company data – including banks and insurance companies
- extensive corporate ownership structures and beneficial ownership information
- financial strength metrics and projected financials
- scores on companies with limited financials
- associated news and independent research
- data on individuals associated with companies
- public tenders data



Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	12 of 13

## 5. Continuous improvement

HBPO has already established the CSR campaigns along its supply chain, considering the suppliers' results in purchasing activities. However, as HBPO has recently started this new journey, it shall be understood that we are still improving the methods to implement this new philosophy in our daily business. This includes clear structures and regulations on how to act with suppliers who are not complying to our requirements. We are aware of the importance, the need and the benefit of this new journey and we will assure continuous improvements on this CSR chapter.



## 6. Public documents (available at [www.hpbogroup.com](http://www.hpbogroup.com))

All suppliers are expected to comply with following regulations:

[General Purchasing Conditions](#)

[Supplier Charter](#)

[Code of Conduct \(CoC\)](#)

Title:	Guideline Corporate Social Responsibility (CSR) & Sustainable Procurement	Publication Date:	11.01.2021
Doc. No:	INT-G-478	Owner:	PP
Old Doc. No:	[Old Doc-No.]	Region:	INT
Process Landscape:	Purchasing & Procurement	HBPO-Location:	[HBPO-Location]
		Page:	13 of 13