

Sustainable Procurement Policy

Purpose and scope

Suppliers of VENTREX Automotive GmbH (hereinafter: VENTREX) are obliged to be fully compliant with the local laws, regulations and VENTREX policies applicable to them and must also contractually oblige their sub-suppliers accordingly.

This document sets out VENTREX's requirements and underscores our expectation that our suppliers' activities will be aligned with the principles outlined below.

Our aspiration

VENTREX is aware of its responsibility to contribute to the creation of a sustainable and liveable world. This awareness is reflected in our corporate values and shapes both our way of working and our products.

We leverage technology to create a more sustainable world, and with our innovative solutions we contribute to carbon-free mobility. At the same time, we work continuously on improving our ecological and social footprint.

The role of our suppliers

VENTREX's suppliers support our activities to ensure sustainable procurement practices. They contribute to quantifiably recording and continuously improving our environmental, social and corporate performance along the entire supply chain.

To achieve our sustainability goals and define and implement effective measures leading to excellent results across all three pillars of sustainability (Environment, Social, Governance — ESG), it is important to us that we work with partners that are actively improving their own environmental and social impact through their business activities.

Consequently, this Policy applies not just to VENTREX itself, but equally to all its business partners, particularly those along the upstream supply chain.

Other applicable documents

Code of Conduct in the current version

<https://aalberts.com/who-we-are#code-of-conduct>

Supplier Code of Conduct in the current version

<https://aalberts.com/who-we-are#code-of-conduct>

VENTREX Sustainability Policy in the current version

<https://www.VENTREX.com/en/download/>

Responsibility for the environment

Protection

Carbon-free mobility: our products contribute to the transformation of mobility by supporting alternative powertrain systems. With our valves and pressure regulators for H₂ and CNG/LNG applications and our air-conditioning valves for environment-friendly refrigerants in electric vehicles, we are facilitating carbon-free mobility.

The reduction of environmental impacts — by preventing water, soil and air pollution, managing waste responsibly, minimising the use of energy and resources, and other actions — is central to our sustainable corporate management. The basis of this is our ISO 14001-certified environmental management system.

We expect our suppliers to introduce and maintain an equivalent system.

Decarbonisation

Measurable goals: our environmental team and EHS specialists drive effective corporate climate actions to continuously reduce our CO₂ emissions, defining measurable goals that demonstrate our sustainability and EHS commitments and progress. Through regular awareness campaigns, we motivate our employees to actively support these goals in their individual area of influence.

We work with our customers and suppliers to amplify our impact. For this reason, VENTREX has established a Sustainability Policy that clearly defines our expectations of our business partners.

The scope of our group-wide *Net Zero Carbon* strategy includes a binding requirement to achieve a 40% reduction in Scope 1 and 2 CO₂ emissions by 2030 compared to the baseline year. By obtaining 100% renewable energy and implementing supplementary compensation measures, VENTREX has already exceeded this goal today, effectively reducing its emissions to 0%.

To achieve our group goal of reducing our Scope 3 CO₂ emissions by 30% by 2030, we have identified and prioritised all relevant emission areas as outlined in the Greenhouse Gas (GHG) Protocol.

Our focus is on reducing Scope 3.1 emissions (purchased goods and services). In 2024, these stood at 100tCO₂/€m, accounting for the majority (80%) of our total emissions. We aim to achieve this reduction through improved data collection on CO₂ emissions in the supply chain and through joint reduction strategies with our suppliers — which once again underscores the crucial importance of this Policy.

Environmentally compatible products

When developing their products and services, VENTREX's suppliers take care to minimise the use of energy and natural resources. The products should be as reusable, recyclable or safely disposable as possible. The products supplied to VENTREX are free from any substances of very high concern as covered by the REACH Regulation. If these are unavoidable, such contents must be declared in advance. Materials or bought-in parts that do not meet the requirements of the RoHS Directive must be replaced by the supplier, in consultation with VENTREX, with compliant alternatives. Where necessary, the supplier must submit an EU Declaration of Conformity verifying their compliance with the RoHS Directive.

Avoidance of hazardous substances

Substances which, when released, pose a danger to human health and the environment must be avoided. VENTREX's suppliers maintain a hazardous materials management system that ensures the safe use and transport of any such substances, as well as their safe storage, reprocessing, reuse and disposal. The basis for this is the responsible management of chemicals in accordance with the principle of minimal use.

Circular economy

VENTREX is a member of ARA (Altstoff Recycling Austria) and additionally takes all necessary measures for the recirculation or recyclability of the waste generated in the company. These include systematic waste separation, agreements on the reuse and recycling of waste, as well as the proper treatment, separation and recirculation of production residue created, for example in the form of chips from the machining production within the company.

We expect our suppliers to implement an efficient waste management system and apply the highest possible recycling rates for the raw materials they use.

VENTREX is pursuing the goal of systematically recording the actual recycling rate of 100% of its series suppliers and including this data in the supplier selection process by 2030.

Social responsibility

As we build on our capabilities and diverse technologies to decarbonise the industry and accelerate global climate solutions, we also focus on improving our ecological and social footprint. This is firmly anchored in our corporate policy and our core values: respect for each other, customer focus, pursuit of excellence, and respect for our environment.

Human rights and working conditions

VENTREX's suppliers support activities that ensure the responsible procurement of raw materials. The procurement and use of raw materials obtained through unlawful, ethically questionable or unreasonable measures is excluded. In particular, this applies, for example, to conflict minerals that are subject to embargos or other import restrictions. For this reason, our suppliers are obliged to identify these raw materials in manufactured products in the supply chain and disclose the origin for the sources supplying the raw materials they use.

Basic principles

Equality — We ensure equal opportunities by basing hiring decisions exclusively on qualifications and skills.

Diversity and inclusion — We consider mutual respect, openness and the appreciation of differences as an integral component of our corporate culture.

Human rights — We make sure that human dignity and human rights are preserved along the entire value chain.

Women's rights — We are emphatic supporters of advancing and respecting women's rights.

Occupational health and safety — We are committed to providing safe working conditions and to accident prevention. We regularly perform workplace- or activity-related hazard assessments to determine the necessary preventive and protective measures.

Training and development — We ensure our employees' work ability and employability by providing continuous training and development (see VENTREX Academy).

Transparency — We inform our employees about goals, current issues and the company's economic situation.

Working conditions — We follow the applicable laws and regulations regarding working hours and offer preventive medical screenings, ergonomic workplace analyses and seminars on stress management.

Compliance — We comply with international regulations on preventing corruption, combating money laundering and avoiding bribery. We ensure that our employees are aware of these issues through regular training and communication measures set up by our parent company, Aalberts.

Material compliance

VENTREX prefers to cooperate with suppliers that fulfil the requirements of the Responsible Minerals Initiative (RMI).

To ensure this, we consistently request information, utilising the Conflict Minerals Reporting Template (CMRT) developed by the RMI.

Entrepreneurial responsibility

Our values are anchored in the group-wide *Code of Conduct (CoC)*.

Our *Human Rights Policy* and our *Sustainability Policy* reflect these principles, establishing mandatory standards. The high expectations we have on ourselves apply equally to our business partners, and we expect them to comply with and respect these. Alternatively, our suppliers can provide evidence of comparably rigorous standards and of their due diligence in the supply chain.

To ensure full compliance, we pass our values on to our partners through the *Supplier CoC*. By 2030, our goal is to have proof of this compliance, in the form of signed *Supplier CoCs* or similarly strict values, from 80% of our suppliers.

Due diligence

To assess our direct suppliers' environmental performance and compliance with our requirements, we use a standardised questionnaire. This is evaluated according to defined criteria, and the results are directly incorporated into our supplier evaluation.

To fully integrate the sustainability performance outcomes from our supplier questionnaire into our supplier evaluation, our goal is to achieve 80% coverage of the response to this questionnaire by 2030.

Grievance mechanism

VENTREX is committed to offering its employees and business partners a secure and empathetic environment where they can openly address sensitive issues (concerns, risks or infringements) without having to fear retaliatory measures of any kind. We actively support the *Speak up!* campaign in place at Aalberts and have additionally established a dedicated reporting system specific to VENTREX in accordance with the Austrian Whistleblower Protection Act (HinweisgeberInnenschutzgesetz).

[VENTREX reporting system](#)

[Aalberts Speak-up!](#)

Sub-suppliers

VENTREX's suppliers are obliged to ensure compliance with the provisions of this Policy by securing appropriate contractual agreements with their contractors.

Compliance and scope

Our suppliers are required to report any non-compliance with this Policy to their respective contact in Procurement. In the event of nonconformity with any of the aforementioned principles, VENTREX reserves the right to early termination of the business relationship with any supplier and/or shall require that suppliers implement an action plan to bring their performance into line. VENTREX will provide suppliers with technical support to the extent necessary to jointly define the required remedies.

Acknowledgement

We expect suppliers that are in a business relationship with VENTREX to implement this Policy and commit themselves to upholding environmental policies of a comparable standard.

Training

All employees receive training to ensure that they fulfil the obligations arising from the *Code of Conduct*. In particular, the Procurement department, being most directly impacted, is provided with in-depth training on the specific requirements of this Policy in respect of the sustainable procurement of raw materials.

Review

This Policy is reviewed annually by the VENTREX Sustainability Committee during their monthly meetings on current projects to improve sustainability performance.

The purpose of this review is to ensure that the Policy is complete, up-to-date and continuously improved in response to the dynamic requirements in the area of sustainability.