

1. Preamble

GEALAN Formteile GmbH (hereinafter referred to as “the Company”) is committed to ecologically and socially responsible corporate governance. We expect the same conduct from all our Suppliers. We also expect our employees to observe the principles of ecological, social and ethical conduct and to integrate them into the corporate culture. Furthermore, we strive to continuously optimize the sustainability of our business activities and our products [or services] and request that our Suppliers take a comprehensive approach to contributing to these efforts.

To facilitate future collaboration, the Contracting Parties agree on the validity of the following rules establishing a common Code of Conduct. This agreement serves as the basis for all future deliveries. The Parties shall comply with the principles and requirements of the Code of Conduct. Suppliers are requested to contractually oblige their sub-contractors to comply with the standards and rules outlined in this document. This Code of Conduct enters into effect on the date it is signed by both Parties. A breach of this Code of Conduct may constitute grounds and cause for the Company to terminate the business relationship, including any related supply contracts.

The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children’s Rights and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labour Standards of the International Labour Organization and the United Nations Global Compact. We expect our Suppliers to comply with all relevant laws, regulations and standards requirements.

2. Requirements for Suppliers

2.1 Social responsibility

2.1.1 Exclusion of forced labour

No forced labour, slave labour or similar practices shall be used. All labour must be performed on a voluntary basis and employees must be able to end the work or their employment relationship at any time. Furthermore, workers may not be exposed to unacceptable treatment, such as psychological hardship, sexual and personal harassment.

2.1.2 Prohibition of child labour

Child labour must never be used at any stage of production. Suppliers are required to comply with ILO convention recommendations on the minimum age for admission to employment. Accordingly, workers may not be younger than the age at which compulsory education ends and in any case not younger than fifteen (15) years of age.

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2.1.3 Fair remuneration

The compensation workers receive must conform to all applicable laws on remuneration, including laws governing minimum wage or overtime. If the statutory minimum wage is not sufficient to cover the cost of living, the business partner is obliged to pay a wage that covers basic needs. Under no circumstances may wages be deducted as a punitive measure. The basis on which workers are paid must be communicated to employees regularly on their wage statements.

2.1.4 Fair working hours

Working hours must conform to applicable laws or industry standards. Overtime is only permitted if it is carried out on a voluntary basis and does not exceed twelve (12) hours per week, while employees must be given at least one (1) day off after six (6) consecutive working days. Weekly working hours may not regularly exceed forty-eight (48) hours.

2.1. Freedom of association

The Supplier shall respect workers' rights to freedom of association, to join trade unions, to call on labour representation or to join works councils in accordance with local laws. Workers must be able to communicate freely with management without fear of reprisal or harassment.

2.1. Prohibition of discrimination

Any form of discrimination against employees is strictly prohibited. This applies, for example, to discrimination based on gender, race, caste, skin colour, disability, political opinion, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual must be respected.

2.1.7 Occupational health and safety

The Supplier is responsible for providing a safe and healthy working environment. Through the establishment and application of appropriate occupational safety systems, necessary precautionary measures must be taken to prevent any work-related accidents and injuries to health. In addition, employees will receive regular updates and training on applicable health and safety standards and measures. Employees will be provided with access to clean drinking water in sufficient quantities along with access to clean sanitary facilities.

2.1. Complaint mechanisms

The Supplier is responsible for establishing an effective complaint mechanism so individuals and communities that may be impacted by adverse effects can air grievances at the operational level.

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2.1.9 Handling conflict minerals

The Company shall establish processes in line with the Organisation for Economic Cooperation and Development's (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas for the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt and expect the same from its Supplier. Smelters and refineries without adequate, audited due diligence processes should be avoided.

2.2 Ecological responsibility

2.2.1 Treatment and discharge of industrial waste water

Waste water from operations, manufacturing processes and sanitary facilities shall be typed, monitored, inspected and treated as necessary prior to discharge or disposal. In addition, measures should be introduced to reduce the volume of waste water generated.

2.2.2 Handling air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be typed, routinely monitored, verified and treated as necessary prior to their release. The Supplier also has the task of monitoring its exhaust gas cleaning systems and is required to find cost-effective solutions to minimize any emissions.

2.2.3 Handling waste and hazardous substances

The Supplier follows a systematic approach to identifying, handling, reducing and responsibly disposing of or recycling solid waste. Chemicals or other materials that pose a hazard if released into the environment shall be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse and disposal.

2.2.4 Reducing consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided. This is done either directly at the point of origin or by means of processes and measures, e.g. by changing production and maintenance processes or procedures in the company, by using alternative materials, through savings, through recycling or by reusing materials.

2.2.5 Energy consumption/efficiency

Energy consumption shall be monitored and documented. Cost-effective solutions must be found to improve energy efficiency and minimize energy consumption.

2.3 Ethical business conduct

2.3.1 Fair competition

Fair business, fair advertising and fair competition standards shall be observed. In addition, all effective antitrust laws, particularly those which prohibit collusion and other activities that influence prices or conditions when dealing with competitors, must be applied. Furthermore, these rules prohibit agreements between customers and Suppliers that are intended to restrict customers' freedom to autonomously determine their prices and other terms and conditions of resale.

2.3.2 Confidentiality/data privacy

The Supplier shall meet all reasonable data privacy expectations of its client, suppliers, customers, consumers and employees. The Supplier shall comply with data privacy and information security laws and official regulations when collecting, storing, processing, transmitting and disclosing personal information.

2.3.3 Intellectual property

Intellectual property rights must be respected; technology and knowledge transfers shall be made in a way that protects intellectual property rights and customer information.

2.3.4 Integrity/bribery, undue advantage

The highest standards of integrity must be applied to all business activities. The Supplier must have a zero-tolerance policy that prohibits all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be applied to ensure compliance with anti-corruption laws.