

# **Code of Conduct**

Blechdruckerei Kindel is committed to ecologically and socially responsible corporate management. We expect the same behaviour from all our suppliers. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into our corporate culture. We also strive to continuously optimise our business activities and our products and services in terms of sustainability and ask our suppliers to contribute to this in the sense of a holistic approach.

For future cooperation, the contractual partners agree to apply the following regulations for a joint code of conduct. This agreement shall form the basis for all future deliveries. The contracting parties undertake to fulfil the principles and requirements of the Code of Conduct and to endeavour to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. This agreement comes into force upon signing. A breach of this Code of Conduct may be cause for the company to terminate the business relationship, including all associated 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 the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights and the International Labor Standards of the International Labor Organization.

The Code of Conduct contains the following elements:

Requirements for suppliers:

- Social responsibility
- Ecological responsibility
- Ethical business behaviour

Implementation of the requirements

Awareness and consent of the supplier

#### Requirements for suppliers

## Social responsibility

## **Exclusion of forced labour**

No forced labour, slave labour or comparable work may be used. All labour must be voluntary and employees must be able to terminate their work or employment relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment.

## Prohibition of child labour

Child labour must not be used at any stage of production. Suppliers are requested to comply with the recommendation of the ILO conventions on the minimum age for the employment of child labour. Accordingly, the age should not be less than the age at which compulsory education ends and in any case not less than 15 years. If children are found at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected and special protective regulations must be observed.

#### Fair remuneration

Remuneration for regular and overtime hours must correspond to the national statutory minimum wage or the industry minimum standards, whichever is higher. The remuneration for overtime must always exceed the remuneration for regular hours. If the remuneration is not sufficient to cover the costs of normal living expenses and to build up a minimum level of reserves, the supplier is obliged to increase the remuneration accordingly. Employees shall be granted all legally prescribed benefits. Deductions from wages as punitive measures are not permitted. The supplier must ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

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### Fair working hours

Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive working days. The weekly working time may not regularly exceed 48 hours.

#### Freedom of association

The right of employees to form and join organisations of their choice and to conduct collective bargaining must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for independent and free association of employees for the purpose of collective bargaining must be granted. Employee representatives must be protected from discrimination. They must be granted free access to the workplaces of their colleagues in order to ensure that they can exercise their rights in a lawful and peaceful manner.

#### **Prohibition of discrimination**

Discrimination against employees in any form is prohibited. This applies, for example, to discrimination based on gender, race, caste, skin colour, disability, political conviction, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

## Health protection; safety in the workplace

The supplier is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the work. In addition, employees are regularly informed and trained on applicable health and safety standards and measures. Employees are given access to sufficient quantities of drinking water and access to clean sanitary facilities.

#### **Grievance mechanisms**

The supplier is responsible for establishing an effective grievance mechanism at the operational level for individuals and communities that may be affected by adverse impacts.

#### Dealing with conflict minerals (if applicable)

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company establishes processes in accordance with the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects its suppliers to do the same. Smelters and refineries without appropriate, audited due diligence processes should be avoided.

## **Ecological responsibility**

### Treatment and discharge of industrial waste water

Wastewater from operations, manufacturing processes and sanitary facilities should be identified, monitored, inspected and treated as necessary prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of waste water.

## Dealing with air emissions

General emissions from operational processes (air and noise emissions) and greenhouse gas emissions must be standardised before they are released, routinely monitored, checked and treated if necessary. The supplier also has the task of monitoring its exhaust gas purification systems and is required to find economical solutions to minimise any emissions.

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### Handling of waste and hazardous substances

The supplier shall follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a risk if released into the environment shall be identified and handled in a manner that ensures safety during handling, transport, storage, use, recycling or reuse and disposal.

#### Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by saving, by recycling or by reusing materials.

## Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Economic solutions must be found to improve energy efficiency and minimise energy consumption.

#### Ethical business behaviour

### Fair competition

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors. These regulations also prohibit agreements between customers and suppliers that are intended to restrict customers in their freedom to determine their own prices and other conditions for resale.

## Confidentiality/data protection

With regard to the protection of private information, the supplier undertakes to fulfil the reasonable expectations of its client, suppliers, customers, consumers and employees. The supplier shall comply with data protection and information security laws and governmental regulations in the collection, storage, processing, transmission and disclosure of personal information.

## Intellectual property

Intellectual property rights must be respected; technology and know-how must be transferred in such a way that intellectual property rights and customer information are protected.

### Integrity/bribery, taking advantage

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

#### Implementation of the requirements

With regard to supply chains, we expect our suppliers to identify risks within them and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier will inform the company promptly and, if necessary, regularly about the violations and risks identified and the measures taken.

The client is given the opportunity to check compliance with the Code of Conduct. For this purpose, it shall provide information in writing in response to enquiries and enable on-site inspections of its premises. The supplier agrees that the client may carry out such audits to verify compliance with the Code of Conduct at the supplier's premises during normal business hours after reasonable advance notice by persons authorised by the client (e.g. auditors). The supplier may object to individual audit measures if these would violate mandatory data protection regulations.

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Should a breach of the provisions of this Code of Conduct be identified, then the client shall notify the supplier in writing within one month and set the supplier a reasonable reasonable grace period to bring its behaviour into line with these regulations. If such a breach is culpable and makes it unreasonable for the client to continue the contract until its ordinary termination, the client may terminate the contract after the fruitless expiry of the grace period set if it has threatened to do so when setting the grace period. A statutory right to extraordinary termination without setting a grace period remains unaffected, as does the right to compensation.

## Acknowledgement and consent of the supplier

All business partners are expected to act in accordance with the law.

By signing this document, the supplier undertakes to act responsibly and to comply with the principles/ requirements listed. The supplier undertakes to communicate the content of this code to its employees, authorised representatives and subcontractors in a way that they can understand and to take all necessary precautions to implement the requirements.

Company: ..... Street, no.: Zip code, city: Signature: .....

Name in capital letters:

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