



## **Code of Conduct (CoC)**

**Hamberger Group**

2022/06/30

The **HAMBERGER®** Group is committed to ecologically, socially and sustainably responsible company management.

We expect the same behaviour from all our suppliers and their subcontractors.

We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate these principles into the corporate culture. Furthermore, we strive to continuously optimise our entrepreneurial behaviour and as well as our products and services in terms of sustainability. We expect our suppliers to contribute to this as part of a holistic approach.

For the cooperation with our suppliers, the contractual partners agree on the validity of the following regulations for a common code of conduct. This agreement shall serve as the basis for all future deliveries. The contractual partners commit themselves to the fulfilment of the principles and requirements of this Code of Conduct. Suppliers are urged to contractually oblige their subcontractors to comply with the standards and regulations stated in this document. **This agreement comes into force with the acceptance of our orders.**

A breach of this Code of Conduct may be reason 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.

## Social responsibility

### **Exclusion of forced labour**

There shall be no use of forced labour, slave labour or work of a similar nature. All work must be voluntary, and employees must be able to leave work or terminate their employment at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological cruelty, sexual or personal harassment.

### **Prohibition of child labour**

There shall be no use of child labour at any stage of production. Suppliers are required to comply with the recommendation from the ILO Conventions on the minimum age for the employment of children. Accordingly, the age must not be less than the age at which compulsory education ends and not less than 15 years of age.

### **Fair pay**

The remuneration paid to workers must comply with all applicable laws on remuneration, including, for example, laws on minimum wage or overtime. Wage deductions as punitive measures are not permitted. The basis on which workers are paid shall be made known to employees on an ongoing basis by means of a pay slip.

### **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; employees must be given at least one day off after six consecutive days of working. The number of weekly working hours is not allowed to regularly exceed 48 hours.

### **Freedom of association**

The supplier shall respect the right of workers to freedom of association, to join trade unions, to recourse to labour representation or to join works councils in accordance with local laws. The workers must be able to communicate openly with management without fear of reprisal or harassment.

### **Prohibition of discrimination**

Discrimination against employees in any form is not permitted. This applies, e.g., 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 shall be respected.

### **Health protection; Safety at work**

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 with regard to the applicable health and safety standards and measures. Employees are provided with access to drinking water in sufficient quantities as well as access to clean sanitary facilities.

## **Complaint mechanisms**

The supplier is responsible for establishing an effective complaint mechanism in the company for individuals and communities that may be affected by negative circumstances.

## **Approach to conflict materials**

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company shall establish processes in accordance with the Organisation for Economic Cooperation and Development's (OECD) guiding principles on due diligence to promote responsible supply chains for minerals from conflict and high-risk areas, and expects the same from its supplier. Smelters and refineries without adequate, audited due diligence processes should be avoided.

## Ecological responsibility

### **Treatment and discharge of industrial waste water**

Waste water from operating procedures, manufacturing processes and sanitary facilities shall be categorised, monitored, inspected and treated, if necessary, prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of waste water.

### **Handling air emissions**

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be categorised, 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 economic solutions to minimise any emissions.

### **Handling 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 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.

### **Reduction of the 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 shall be done either directly at the point of origin or through processes and measures, e.g. by changing production and maintenance processes or procedures in the company, by using alternative materials, through saving measures, through recycling, or by reusing materials.

### **Wood and wood products**

The supplier must ensure and prove that he and his sub-suppliers only supply legally and sustainably harvested wood or products made from that wood and that this can also be proved. (see, for example, the European Timber Regulation EUTR).

### **Approach to energy consumption/efficiency**

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

### **CO2 footprint**

CO2 emissions should be systematically reduced. This can be achieved, for example, through the increased use of sustainable energy sources.

The supplier follows a systematic approach to achieve CO2 reduction in its area of responsibility.

## Ethical business conduct

### **Fair competition**

The standards of fair business, fair advertising and fair competition shall be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit collusion and other activities that influence prices or conditions when dealing with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to autonomously determine their prices and other conditions when reselling.

### **Confidentiality/Data protection**

The supplier undertakes to meet the reasonable expectations of its contractees, suppliers, customers, consumers and employees with regard to the protection of private information. The supplier shall comply with data protection and information security laws and official regulations when collecting, storing, processing, transmitting and disclosing personal information.

### **Intellectual property**

Intellectual property rights shall be respected. Technology and know-how transfers shall be carried out in a way that protects intellectual property rights and customer information.

### **Economic sustainability**

We see economic success as the basis for long-term successful supplier relationships, job security and the fulfilment of social and ecological responsibility in the supply chain.

### **Integrity/Bribery, Personal gain**

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

## Implementation of the requirements

We expect our suppliers to identify risks within supply chains and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, we demand the disclosure of supply chains.

We reserve the right to verify compliance with the standards and regulations listed in this document, e.g. by means of a self-assessment questionnaire and sustainability audits at the suppliers' production sites.

We reserve the right to take appropriate measures against suppliers who do not meet these requirements; these measures may ultimately lead to the suspension or termination of a supply relationship.

The supplier undertakes to act responsibly when accepting orders, and to adhere to the stated principles and requirements. The supplier confirms that it effectively communicates the contents of this Code of Conduct to workers, commissioned parties, its subcontractors and suppliers and assures that all necessary arrangements are properly implemented.

The HAMBERGER® group of companies provides a 'Speak Up' platform on its Internet homepage [www.HAMBERGER.com](http://www.HAMBERGER.com), by means of which violations of these requirements can be reported to us. We assure you that all information will be pursued. All information provided by the person reporting a violation will be treated as strictly confidential.

If desired, anonymous reports can be made.

Stephanskirchen, 30th of June 2022

Hamberger Industriewerke GmbH



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