



Code of Conduct (CoC) of STANNOL GmbH & Co. KG

STANNOL GmbH & Co. KG believes that the sustainable relationship between people and the environment is an integral part of its value system. The basis for this is compliance with social, ethical and ecological standards, as described, for example, in the conventions of the International Labor Organization (ILO), in the National Action Plan for Business and Human Rights (NAP) and in the Universal Declaration of Human Rights of the United Nations. In addition to being observed by the company's own employees, the formulated requirements are also applied in STANNOL's supply chain.

In the course of extending its sustainability activities to the entire value chain, STANNOL has formulated this Code of Conduct (CoC). It defines the central minimum sustainability requirements and is primarily addressed to suppliers, service providers and business partners of STANNOL.

In addition to act in accordance with the law, all business partners are expected to accept the following requirements and to communicate them to their own suppliers and service providers.

STANNOL reserves the right to update this CoC and to have its suppliers, service providers and business partners confirm this bindingly by signature in the future.

The supplier and/or business partner hereby declares:

- To actively work against corruption and bribery in all forms.
- To fight against any form of illegal employment of workers.
- To actively prevent child labor and forced labor of any kind.
- To provide a safe and healthy workplace for its employees.
- To pay reasonable wages in accordance with applicable wage laws and to observe reasonable working hours in accordance with applicable law or industry standards.
- Not to tolerate any form of discrimination and to promote equal treatment and opportunities for its employees.
- Respect employees' rights to freedom of association, to join trade unions, to call for labor representation or to join works councils, and neither favor nor discriminate against employees in this regard.
- To treat employees with dignity and respect and to prohibit any form of unlawful disciplinary action.
- Establish an effective complaint mechanism for individuals and communities, where reasonably practicable.
- Adhere to the standards of fair business and fair competition.
- Actively engage in climate protection and support energy efficiency measures and the expansion of a climate-friendly and decentralized energy supply.
- To deal responsibly with environmental protection issues, in particular resource and energy consumption.
- To make the use and consumption of resources in production and use as efficient and sustainable as possible and to give preference to energy-efficient and environmentally friendly technologies.
- To use ecologically valuable and unpolluted materials as far as possible.
- To minimize the impact on people and the environment and to continuously improve the prevention and disposal of waste, wastewater and other emissions.



In the appendix to the Code of Conduct of STANNOL GmbH & Co. KG, the requirements mentioned and defined above are explained in a generally understandable way. In addition, where particularly relevant, the most important norms and standards are mentioned which should be observed in order to fulfill the requirements of the CoC (marked with a §).

Acting in compliance with the law is expected from all business partners.

Compliance declaration of the supplier:

Company:

.....
(place, date)

.....
(signature)

.....
(name in block letters)



Annex to the Code of Conduct of STANNOL GmbH & Co. KG

Social Responsibility & Ethical Business Conduct

1. Commitment against corruption and bribery

- Corruption, bribery, extortion and embezzlement in all forms are to be rejected. Granting, offering, promising or demanding an unfair advantage or participating in illegal influence of political or private business decisions are also prohibited.
- It is forbidden for the supplier and/or business partner to offer money, gifts, loans or objects of value to STANNOL employees. This does not include gifts and invitations that are within the scope of business hospitality or in accordance with the customs and courtesies of a country. STANNOL does not tolerate bribes or kickbacks in any form.

§ Important documents: OECD Guidelines for Multinational Enterprises (Chapter 7).

2. Combating illegal employment

- Any form of illegal employment of workers is to be rejected and combated.
- STANNOL expects written documentation of the employees' working conditions and compliance with applicable national labor and social security standards.

3. Prohibition of child and forced labor

- Child labor and forced labor shall be refrained from and opposed in any way by the supplier and/or business partner. This includes slavery and human trafficking, involuntary prison labor and any form of labor or service required under threat of any penalty. Likewise, the employee's right to terminate the employment relationship within a reasonable period of time at his or her own request must be preserved.
- STANNOL expects the supplier and/or business partner to prevent and combat inhumane conditions and forms of labor within its supply chain and to be able to prove this by means of official documents.

§ Key documents: ILO Conventions 29, 105, 138, 182 and ILO Recommendation 79, 146, UK Modern Slavery Act 2015 (in the UK), Loi relative au devoir de vigilance des sociétés mères et des entreprises donneuses d'ordre (in France), National Action Plan on Business and Human Rights (in Germany), and the United Nations Conventions on the Rights of the Child.

4. Safe and healthy workplace

- The employees of the supplier and/or business partner must be provided with a safe and healthy workplace. In addition, the applicable national legislation on health and safety at work must be complied with.
- The supplier and/or business partner shall, where reasonably practicable, apply appropriate occupational safety management to mitigate potential occupational safety risks and train employees in the prevention of accidents and occupational diseases.
- STANNOL expects that employees of the supplier and/or business partner receive the necessary protective equipment and training or instruction for the work assigned to them. Employees under the age of 18 are not allowed to perform work that is hazardous to their health.

§ Important documents: ILO Convention 138, 155, ILO Recommendation 164 and EU Posted Workers Directive.



5. Reasonable wages and reasonable working hours

- Employees are paid a reasonable wage. Their working hours comply with local applicable law, industrial standards or relevant ILO conventions, whichever is more stringent.
- STANNOL expects the supplier and/or business partner to pay its employees in accordance with applicable wage laws. This includes the payment of minimum wages, overtime and mandated benefits, as well as the prohibition of illegal and unauthorized deductions from wages in the form of disciplinary action. The wages paid should be sufficient to meet the basic needs of workers.
- STANNOL expects that the maximum permissible weekly working hours comply with the relevant legislation. This includes that the regular working time of employees should not exceed 48 hours and, including overtime, should not exceed 60 hours. Employees are entitled to at least one day off after six consecutive working days.
- Overtime shall be performed on a voluntary basis and shall be compensated separately by the supplier and/or business partner in accordance with applicable norms.

§ Important documents: ILO Conventions 1, 14, 26, 102 and 131 as well as EU Posting of Workers Directive.

6. Prevention of discrimination and promotion of equal opportunities

- Any discrimination in the hiring of employees, employment, promotion or the granting of training and further education measures shall not be tolerated.
- The supplier and/or business partner assures to promote equal treatment and equal opportunities for its employees. No employee shall be discriminated against on the basis of ethnic, social or national origin, color, physical or mental disability, sexual orientation, political or religious beliefs, gender or age.

§ Key documents: ILO Conventions 111, 143 and 159, United Nations Universal Declaration of Human Rights (Art. 2), and EU Posting of Workers Directive.

7. Freedom of Association and membership in employee representation bodies

- The supplier and/or business partner shall grant its employees the right to freedom of association, to join trade unions, to appeal to labor representatives, to join and form works councils and, in addition, to engage in collective bargaining. This means that employees who are active as employee representatives must not be discriminated against.
- STANNOL expects the supplier and/or business partner to promote alternatives to worker representation if this right is restricted by national laws.

§ Key documents: ILO Conventions 87, 98, 135 and 154, and ILO Recommendation 143.

8. Prohibition of disciplinary measures

- All employees shall be treated with dignity and respect and any form of improper disciplinary action shall be prohibited. This includes that sanctions, fines, other penalties or disciplinary measures may only be taken in accordance with applicable national and international standards and internationally recognized human rights.
- STANNOL expects that no employee shall be subjected to any form of violence, especially verbal, psychological, physical, sexual or physical. This includes refraining from corporal punishment, deprivation of liberty, threats of violence, coercion, harassment, bullying or abuse to achieve discipline and obedience.

§ Key documents: United Nations Universal Declaration of Human Rights (Art. 5).



9. Effective complaints mechanism

- The supplier and/or business partner is responsible for establishing an effective complaints mechanism for individuals and communities where this can be done at reasonable cost. This means that STANNOL expects that employees who are affected by negative impacts at the factory level can communicate this confidentially and anonymously through appropriate channels.

10. Fair business activity

- The supplier and/or business partner shall behave fairly in competition and avoid possible conflicts of interest. This concerns the observance of prevailing standards for fair business and fair advertising, the equal treatment of all subcontractors as well as the observance of applicable antitrust laws. The latter includes that the supplier and/or business partner neither participates in antitrust agreements with competitors nor abuses its dominant position.
- STANNOL expects the supplier and/or business partner to avoid conflicts of interest with private interests, economic connections or other activities, whether of relatives or otherwise related persons or organizations, from the outset.
- STANNOL expects the supplier and/or business partner to comply with relevant legal obligations to prevent money laundering and not to engage in money laundering activities.

§ Important documents: OECD Guidelines for Multinational Enterprises (chapters 8, 10).

Ecological responsibility

11. Climate Protection

- The supplier and/or business partner shall develop concrete goals and measures to make its business activities as climate-friendly as possible, insofar as this is possible with reasonable effort.
- This includes that the supplier and/or business partner uses energy efficiency measures and expands a climate-friendly energy supply.

§ Key documents: ISO 14001:2015.

12. Responsible handling of environmental protection issues

- Resource and energy management systems
- The supplier and/or business partner shall address the possibilities and requirements of environmental protection, in particular resource and energy conservation, to an extent appropriate to its business activities. This means that the main environmental issues are known and managed or taken into account, ideally in the form of an environmental management system in accordance with or based on ISO 14001 or comparable standards.

§ Important documents: OECD Guidelines for Multinational Enterprises (Chapter 6).

13. Use of resources

- The use and consumption of natural resources in production and use shall be efficient, sustainable materials shall be preferred wherever possible and energy efficient and environmentally friendly technologies shall be used.



- STANNOL expects the supplier and/or business partner to make continuous improvements to products and production processes in order to contribute to saving resources and minimizing environmental impact. This also includes the implementation of procedures that enable the recycling of raw materials that have already been processed.

§ Important documents: EMAS Regulation (No. 1221/2009) and ISO 14001:2015.

14. Ecologically valuable and uncontaminated materials

- As far as possible, ecologically valuable and unpolluted materials shall be used in the manufacturing process, so that further processing and use of the products are harmless to health.
- STANNOL expects suppliers and/or business partners to certify their products with recognized eco-labels in order to provide evidence of the environmental compatibility of the products and their components (e.g. eco-labels such as Blue Angel and Natureplus).

15. Avoidance and proper disposal of waste, wastewater and emissions

- Waste, waste water and emissions with potential negative effects on the environment or human health are to be avoided or disposed of appropriately.
- STANNOL expects the supplier and/or business partner to mitigate the extent of environmental pollution resulting from its business activities to the greatest extent possible. This includes the implementation of processes and innovative systems that ensure the recycling of valuable and waste materials and enable a reduction of emissions and waste water.