

As a company, we see ourselves as part of the economic chain, but also as part of society. We strive to ensure that international human rights are recognized and observed by us and within our supply chain for the benefit of all persons involved.

Furthermore, we see it as part of a sustainable business model that corruption and bribery are not supported and promoted, that the impact of the supply chain on environmental and climate protection is assessed and possible negative effects are reduced, and that biodiversity is preserved and promoted.

We therefore adhere to the following code of conduct and expect the same from those involved in our supply chains:

## **1. Human rights**

### **i. Free choice of employment**

- No forced labor, forced servitude or involuntary prison labor.
- No deposit of a "pledge" or of employee identification documents.
- Right to termination of the employment relationship.

### **ii. Respect for freedom of association, right to collective bargaining**

- Respect for the right of employees to assemble, form and participate an employee representation.
- Respect for employee representation or the trade union as a collective bargaining partner.
- An open attitude towards employee representatives and respectful interaction with them.

### **iii. Safe and hygienic working conditions**

- Ensuring an appropriate safe and hygienic working environment in accordance with the state of the art.
- Taking appropriate measures to prevent accidents and damage to health by minimizing hazards associated with the working environment as far as possible.
- Regular training for all employees on all relevant aspects of occupational health and safety. Induction training for new employees on all relevant aspects of occupational health and safety.
- Access to clean sanitary facilities, drinking water and safe places to store food.
- Integration of occupational health and safety management into upper management.

**iv. No child labor**

- No use of child labor.
- Compliance with the requirements of the Youth Protection Act. No hindrance of the school education of adolescent (15-18 years).
- No employment of young people under the age of 18 at night or under dangerous conditions.

**v. Collective pay, payment of minimum wages**

- Wages and remuneration at least in accordance with the provisions of collective bargaining law or the local minimum wage. If the public minimum wage is below the living wage, payment of a living wage.
- Information on the amount, type and time of wage payment upon hiring.
- No deductions from wages as disciplinary measures.

**vi. No excessive working hours**

- Compliance of working hours with national legislation and collective agreements.
- No regularly exceeding of 48 working hours per week.
- On average at least one day off per 7 days.
- Working overtime is voluntary.

**vii. No discrimination**

- No discrimination in hiring, compensation, promotion, advancement, termination of employment or retirement based on race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation or similar.

**viii. Regulated employment relationships**

- Regulation of employment relationships through contracts.
- No circumvention of regulated employment relationships by taking advantage of temporary work, fixed-term employment contracts, etc.

**ix. No inhumane or brutal treatment**

- Prohibition of physical abuse or physical discipline, threats thereof, sexual or other harassment and verbal abuse or other forms of intimidation.

**2. Fair business practice**

- Supporting fair and equitable business and trade principles.
- Compliance with competition and antitrust law.
- Respect for local culture and customs.

**3. Compliance with laws, bribery and corruption**

- Compliance with applicable, valid laws and jurisdictions at both local/regional and national/international level.
- No tolerance of bribery, corruption and embezzlement, in particular with regard to business partners, government and/or public officials.
- Resolute action against any organized crime that threatens the social order.

**4. Environmental and climate protection**

- Compliance with legal standards for environmental and climate protection, particularly in the areas of emissions, handling of chemicals and other hazardous substances, generation and disposal of waste and wastewater.
- Careful use of resources (energy, water, especially drinking water and waste water, air).
- Development of concepts to reduce our own greenhouse gas emissions.
- Proactive climate and environmental protection involving all stakeholders, such as employees and suppliers.

**5. Biodiversity, protection of forests**

- Reducing the negative impact of our own supply chain on biodiversity and the ecosystem.
- Promotion of biodiversity within the supply chain.
- Responsible management of commercial forests and protection of bioreserves and primeval forests.

**6. Vulnerable groups**

- Respecting and protecting the land rights of vulnerable groups (e.g. indigenous population) within the supply chain.

**7. Animal welfare**

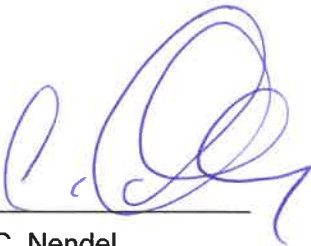
- Compliance with animal welfare where relevant within the supply chain.
- Use of vegan and vegetarian alternatives to animal products wherever possible.

## 8. Whistleblower hotline

- Establishment of an independent whistleblower hotline for employees, suppliers, employees of suppliers and other stakeholders.
- This hotline also accepts inquiries anonymously. In case of non-anonymous inquiries/complaints, the complaints office protects the identity of the complainant/whistleblower and only passes on the inquiries/complaints anonymously.
- Publication of the whistleblower hotline contact on the relevant internal and external purchasing documents.
- The Frey + Lau complaints department can be contacted at:  
whistleblower@freylau.com.

All of these points together form the basis for good, fair and sustainable dealings with all stakeholders involved in the supply chain.

Henstedt-Ulzburg, October 30, 2023



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Change history:

The previous version of this document was called Ethical Trade Policy - Human Rights