

Supplier Code of Conduct der Griesson – de Beukelaer GmbH & Co. KG

As a responsible company, Griesson – de Beukelaer takes its social responsibility seriously and is committed to the principles of sustainable and ethical business.

We expect our business partners and suppliers to respect human and labour rights in their business activities, to comply with environmental standards, to prevent corruption and to promote and demand these requirements in their supply chain to the best of their ability. Our contractual partners undertake to fulfil the principles and requirements of this Supplier Code of Conduct and also to endeavour to contractually oblige their subcontractors to comply with the standards and regulations set out in this document.

Compliance with laws and regulations

We expect our suppliers to comply with all applicable laws, rules and regulations and to take appropriate measures to ensure compliance with these laws, rules and regulations.

This Supplier Code of Conduct is based in particular on national laws and regulations such as the Supply Chain Due Diligence Act (LkSG) and international conventions such as the United Nations (UN) Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the international core labour standards of the International Labour Organization (ILO) and the United Nations Global Compact.

The principles contained therein represent minimum standards. Compliance with the national and other relevant laws and regulations applicable in the countries in which the relevant business activities take place and with the principles contained in this Supplier Code of Conduct is mandatory. Of all applicable regulations, the one that is most appropriate for realising the purpose of protection is always decisive.

Respect for human rights and labour conditions

Prohibition of forced labour and slavery

Any form of forced labour, bondage, involuntary prison labour, human trafficking or slavery is prohibited. Employees must be free to leave their employer after giving reasonable notice. 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, humiliation or exploitation.

Security forces must not be commissioned or used if persons are treated or injured in an inhumane or degrading manner during their deployment or if freedom of association is impaired.

Ban on child labour

Child labour within the meaning of the ILO and other UN conventions and/or applicable national law is not permitted. The minimum age for the employment of minors must not be below the applicable age of compulsory education and must be at least 15 years of age, unless ILO



exemption conditions apply. Children's right to education is to be respected. Children and young people under the age of 18 must not be employed at night or under dangerous conditions.

Fair remuneration

Appropriate wages must be paid on time, regularly and in full. The appropriate wage is at least the minimum wage stipulated by the applicable law and must comply with the applicable law of the place of employment. Deductions from wages as disciplinary measures are not permitted. Other deductions from wages that are not expressly permitted or prescribed by the applicable laws require the express consent of the employee concerned.

The supplier must ensure that all employees receive clear, detailed and regular written information on the composition of their remuneration.

Fair working hours

Working hours must comply with applicable laws and industry standards. Overtime is only permitted if it is worked on a collectively agreed and/or voluntary basis, does not exceed twelve hours per week and employees are granted at least one day off after six consecutive working days. The regular weekly working time may not exceed 48 hours. Overtime should be remunerated with overtime remuneration.

Freedom of association

Without exception, employees have the right to organise and form a trade union of their own choosing and to bargain collectively. Employee representatives must not be discriminated against and must always have the opportunity to fulfil their representative functions in the workplace.

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 granted free access to their colleagues' workplaces to ensure that they can exercise their rights in a lawful and peaceful manner.

Prohibition of discrimination

Discrimination, i.e. unjustified unequal treatment of employees on the basis of race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, trade union membership or political affiliation, is not permitted. The prohibition of discrimination also expressly applies to decisions on the recruitment, remuneration, admission to training, promotion, termination of employment or retirement of employees.

The personal dignity, privacy and personal rights of each individual must be respected. Employees must be protected from discrimination by other employees or third parties.

Health and safety at work

The supplier is responsible for a safe and healthy working environment. The supplier is obliged to take the necessary precautionary measures against accidents and damage to health that may arise in connection with the activity by setting up and applying appropriate occupational safety systems.

Appropriate measures must be taken to prevent excessive physical or mental fatigue. In addition, employees must be regularly informed and trained on applicable health and safety standards and measures.



All employees must have access to sufficient quantities of drinking water and clean sanitary facilities. Any company accommodation, if provided, must be clean and safe and meet the basic needs of the employees.

Ban on forced eviction

The unlawful forced eviction and unlawful seizure of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person, is prohibited.

Ethical business practices

Prohibition of corruption and bribery

Any form of corruption or bribery is not permitted. The supplier is therefore expressly prohibited from offering or granting any unauthorised personal benefits to Griesson – de Beukelaer employees in connection with their business activities. This includes, in particular, benefits in kind or in cash, but also benefits that are not necessary for business purposes and/or otherwise inappropriate (including invitations).

Avoidance of conflicts of interest

All suppliers are obliged to inform Griesson – de Beukelaer immediately of any existing or potential conflicts of interest.

Fair competition, compliance with competition and antitrust law and intellectual property

Griesson – de Beukelaer is fully committed to competition by fair means and in particular to strict compliance with competition/antitrust law and expects the same from its business partners. When dealing with competitors, the applicable antitrust laws prohibit in particular agreements and other activities that influence prices or conditions as well as agreements between customers and suppliers that are intended to restrict customers in their freedom to determine prices and other conditions for resale. In addition, Griesson – de Beukelaer suppliers are obliged to respect Griesson – de Beukelaer's intellectual property rights.

Export controls and economic sanctions

All business partners of Griesson – de Beukelaer are obliged to observe and strictly comply with the applicable regulations, laws and other requirements for the import and export of goods, services and information as well as payment transactions. Existing state and supranational sanctions and embargoes are observed in all business activities.

Prevention of money laundering and terrorist financing

Griesson – de Beukelaer takes the risks associated with money laundering, the indirect promotion of criminal structures and the financing of terrorism seriously and expects the same from its suppliers. The requirements and obligations arising from the Money Laundering Act and/or other relevant legal regulations must be strictly observed. This includes analysing risks to the extent required by law, identifying customers, raising employee awareness and reducing cash transactions or processing them in accordance with legal requirements.



Data and confidentiality protection

The protection of personal data and compliance with the applicable data protection regulations is particularly important to Griesson – de Beukelaer. All suppliers are also obliged to comply with the European General Data Protection Regulation and the German Federal Data Protection Act and ensure that the applicable principles and requirements for the processing of personal data are observed at all times. This applies in particular if the supplier processes personal data of employees or other natural persons within the sphere of influence of Griesson – de Beukelaer.

Business secrets and other confidential information disclosed or made accessible by Griesson – de Beukelaer in the course of the co-operation must be treated confidentially by the supplier and protected from disclosure by suitable measures.

If suppliers and service providers are granted access to Griesson – de Beukelaer's premises, technical facilities and IT systems, they are obliged to observe existing technical safety precautions and security measures and not to abuse the access rights granted to them.

Environmental protection and sustainability

Environmental protection laws

Every supplier is obliged to comply with the relevant environmental protection laws and regulations and to fulfil the requirements of waste legislation and pollution and water protection legislation.

All regulations regarding hazardous substances must be complied with. This applies in particular to the storage, handling and disposal of hazardous substances. Employees must be instructed on the handling of hazardous materials and substances.

Treatment and discharge of industrial wastewater

Wastewater from operational procedures, production processes and sanitary facilities must be standardised, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the generation of waste water.

Dealing with air emissions

Air and noise emissions from operational processes must be standardised, routinely monitored, checked and, if necessary, treated before they are released.

The supplier also has the task of monitoring its exhaust gas purification systems and is required to find economical solutions to minimise such emissions.

Handling waste and hazardous substances

The supplier follows a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste.

The bans on the export of hazardous waste in the current version of the Basel Convention of 22 March 1989 must be observed. Chemicals or other materials that pose a risk if released into the environment must be identified and handled in such a way that safety is ensured when handling, transporting, storing, using, recycling or reusing and disposing of these substances.

Mercury shall be used in accordance with the prohibitions of the Minamata Convention of 10 October 2013 and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001, as amended.



Reduce 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, must be reduced or avoided.

This is done either directly at the point of origin or through processes and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by making savings, by recycling or by reusing materials.

Energy consumption must be monitored and documented. Economical solutions should be sought to improve energy efficiency and minimise energy consumption.

Climate protection

Greenhouse gas emissions must be regularly determined and assessed. Effective avoidance and reduction strategies are intended to achieve a continuous reduction in CO₂ emissions in our own operations and along the supply chain in line with the Paris Climate Agreement (in particular the 1.5°C target). The CO₂ reduction targets are based on the specifications of the Science Based Targets Initiative. Available information, reduction targets and data on CO₂ will be made available to Griesson – de Beukelaer on request.

Animal welfare

When using animals, attention must be paid to species-appropriate husbandry and compliance with the applicable animal welfare regulations. Measures that cause unnecessary suffering and pain to animals must be avoided.

Complaints procedure

Griesson – de Beukelaer is very interested in the knowledge and elimination of compliance violations and offers employees and third parties various opportunities to report compliance violations or provide information on possible violations. The supplier is obliged to inform its employees and its own suppliers in an appropriate manner about the possibility of reporting compliance violations confidentially and anonymously via the whistleblower system provided by Griesson - de Beukelaer at www.griesson-debeukelaer.com/compliance

In addition, the supplier shall inform its employees about the access data to such complaint systems of Griesson -de Beukelaer's customers that requested Griesson – de Beukelaer to pass them on. The overview of the relevant customer whistleblower systems can be accessed at www.griesson-debeukelaer.de/lieferanten (user name: GdB-Partner, password: GdB47!KG).

The supplier shall inform its own suppliers that all access data to the reporting systems of both Griesson - de Beukelaer and its customers should be passed on in the supply chain.

Griesson – de Beukelaer encourages its business partners to immediately report any violations of the law within Griesson – de Beukelaer's area of responsibility as soon as they are observed or are highly likely to occur. No business partner need fear any disadvantages, provided that the respective information was provided to the best of their knowledge and with honest intent.

Every supplier is called upon and, within the framework of applicable laws, obliged to maintain its own system for the confidential reporting of compliance violations and to inform its employees of the possibility of such reports. The protection of whistleblowers from disadvantages such as reprisals must be guaranteed.



Application of due diligence obligations

We expect our suppliers to assess human rights and environmental risks within the supply chains themselves. If risks are identified, appropriate preventive and corrective measures must be taken, the effectiveness of which must be reviewed regularly.

Compliance with this Supplier Code of Conduct may be monitored either by Griesson – de Beukelaer or by a third party authorised by Griesson – de Beukelaer, in the event of imminent danger and without a reasonable period of notice.

In the event of violations and to safeguard supply chains with increased risks, the supplier is obliged to inform Griesson – de Beukelaer promptly and, if necessary, regularly about identified violations and risks as well as measures taken.

Griesson – de Beukelaer is happy to discuss the topics of this Supplier Code of Conduct. If Griesson – de Beukelaer identifies risks and violations of human and environmental rights or the contents of this Supplier Code of Conduct, we endeavour to take appropriate measures together with our suppliers to minimise or remedy the risks. Only as a last consequence will the mere existence of an offence be reason and cause for us to terminate a business relationship, including all associated supply contracts.

Acknowledgement and declaration of consent of the supplier

We have taken note of the above Supplier Code of Conduct of Griesson – de Beukelaer and, as a company committed to responsible and ethical behaviour, we undertake to observe and comply with its principles, regulations and requirements.

We will inform our employees, authorised representatives and subcontractors about the content of this Supplier Code of Conduct in an appropriate manner.

Company, company stamp

Place, date

Signature, position