

Code of conduct

for business associates

FOREWORD

This code of conduct is addressed to our business associates who work for, with, or on behalf of a company in the Kläger Group. These rules of behaviour set out the ethical standards and expectations that are binding for our suppliers and business associates.

We expect our suppliers and business associates to comply with the current legal and regulatory requirements and to replicate them in their supply chain.

GENERAL REMARKS

Compliance, integrity and ethics

All of our business associates shall comply with the current laws and norms of the respective countries in which they are active. Business associates shall follow universally applicable ethical values and principles, particularly integrity, honesty and human dignity.

Confidentiality and data protection

Our business associates shall guarantee confidentiality and the protection of all information made available to them as part of our professional relationship.

One of our top priorities is the protection and security of personal data, i.e. information that allows conclusions to be drawn about specific or identifiable natural persons. We therefore expect that our business associates will use personal data only in compliance with all current data protection regulations – in particular the General Data Protection Regulation of the European Union (GDPR).

Confidentiality and IT security are particularly important when processing personal data.

All measures taken by suppliers and business associates for the protection of personal data must be suitable for achieving a level of protection appropriate to the sensitivity of the data in question.

LABOUR LAWS AND HUMAN RIGHTS

Compliance with fundamental and human rights

We require our suppliers and business associates to observe the current human rights and fundamental rights laws of the countries in which they are active, and to enable a fair working environment.

Working hours, wages and other benefits

We require our suppliers and business associates to comply with all current laws regarding working hours, compensation and other benefits.

Suppliers and business associates must remunerate their employees without delay and in compliance with the statutory minimum wage or the higher industry average in the country in question.

Fair and equal treatment

Our business associates shall not tolerate any form of discriminatory behaviour towards their employees based on ethnic background, nationality, gender, pregnancy or parenthood, marital status, age, disability, religion or ideology, sexual orientation or any other reasons that fall under anti-discrimination law.

Our business associates are required to interact with their employees with respect and dignity, in a working environment that is free of harassment, bullying, physical, mental and sexual violence or intimidation.

Prohibition of child labour and forced labour

We require compliance with the national and international codes of behaviour and guidelines of the ILO (International Labour Organisation). We reject child labour and any form of exploitation of children and adolescents. We likewise reject any form of forced labour, debt bondage, serfdom and slavery, or any similar conditions.

Freedom of association, expression and assembly

Our suppliers and business associates shall respect the right of their employees to freedom of association, expression and assembly, as well as the right to collective bargaining, as set down in the applicable laws and ILO conventions.

Employee health and safety

The supplier and business associate shall take responsibility for and guarantee the health and safety of their employees in the workplace. Risks shall be curbed through prevention and proper precautionary measures in order to counteract accidents and occupational illness as best as possible.

In order to achieve this goal, the supplier and business associate shall regularly provide their employees with sufficient training in compliance with national laws. They shall set up and apply an appropriate workplace safety management system. Appropriate systems shall be put in place to prevent risks to health and safety.

GLOBAL DIRECTIVES

Antitrust

Compliance with the prevailing and applicable antitrust and competition law provisions.

Agreements violating competition laws (e.g. price fixing or allocation of markets) shall not be made with competitors, suppliers, customers or other third parties.

Any potential dominant market position must not be exploited without authorisation. Our company rejects any form of bribery.

Our suppliers and business associates shall refrain from all actions that even give the appearance of concerted practice.

We take compliance with money laundering laws extremely seriously and expect the same from our suppliers and business associates. This means our suppliers and business associates must clearly distance themselves from money laundering and the financing of terrorism.

Conflicts of interest

Decisions shall be made solely on the basis of objective, business-related criteria that are not influenced by private or financial interests, or by personal relationships.

Conflicts of interest that could influence the business relationship are to be avoided and/or disclosed.

Material or intellectual property

As a manufacturing firm, the protection of intellectual property is of fundamental importance to our business policy, and is therefore also expected of our business associates. All products of intellectual work are designated as intellectual property, regardless of their commercial value. This includes graphic designs and formulas.

We require compliance with national and international codes of conduct and the guidelines issued by the ILO. We require a fair wage structure, compliance with statutory standards and the right to freedom of expression.

Product quality and safety

Our business associates shall ensure that, upon delivery, all products and services fulfil the criteria as defined in the contract. All applicable regulations and specifications for quality, product safety and security shall be complied with in line with their designated use.

Export regulations

We require compliance with all current and applicable laws, for the import and export of goods, services and information, and the provision of financing, including sanctions, embargos, regulations, government directives and guidelines.

ECOLOGICAL SUSTAINABILITY

Environment

The business associate shall clearly affirm their duty of care towards the environment and the careful handling of natural resources. In addition to this, they shall comply with the applicable laws and regulations, as well as internationally recognised standards of environmental protection.

Environmental pollution caused by business activities shall be avoided or minimised as far as possible. An appropriate monitoring system is to be established and used to monitor, record and reduce environmental pollution in the company.

Environmental impact of products

The business associate shall ensure that their products are safe and environmentally compatible, in terms of development, manufacture, application, transport and disposal. The products comply with applicable statutory requirements for product quality and safety. Negative effects on the climate, biodiversity or water resources must be systematically minimised. This includes in particular the efficient use and conservation of natural resources.

Environmental impact of business activities

Our business associates shall avoid or minimise negative environmental impacts arising from operational procedures, such as airborne emissions, noise pollution, greenhouse gas emissions and generation of waste.

Complaints management

The supplier is responsible for the establishment of an effective complaints procedure at plant level for individuals and groups that could be affected by adverse impacts.

In addition to this, violations of the code of conduct or other compliance violations can be reported via our website at any time.

The Kläger Group shall re-examine this code of conduct at regular intervals and make changes as necessary and appropriate. Suppliers will always be informed of any important changes. The most recent version of this code of conduct can be found on our websites: www.klaeger-group.com and www.vema.net.

Neusäss, December 2023
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