

1. Introduction and Scope

Willy Benecke GmbH sees itself as a responsible medium-sized company with integrity. We are committed to social and ecological corporate management in accordance with applicable legislation. These principles are firmly anchored in our corporate policy and are formulated in the following Code of Conduct.

We expect our employees to commit themselves to this Code of Conduct and to the ethical, social and environmental behaviour set out in it. We also seek to promote compliance with these principles of conduct throughout our supply chain. We therefore expect our suppliers to adhere to these principles and to promote compliance along the supply chain for their part.

2. Business Integrity

Political and Official Relations

We always act honestly and transparently in our dealings with governments and authorities, in accordance with the law and our internal policies. Where regulatory approvals are required for the business or for employees, we will not operate in the business until the approvals have been obtained.

Relationships with Business Partners

We carefully consider the identity and integrity of potential business partners and take reasonable steps to ensure that our business partners do not act improperly or illegally. We will ensure that transactions with our business partners do not violate any applicable economic embargoes, sanctions lists or regulations relating to trade, import and export controls or the financing of terrorism. We make purchasing decisions fairly and based on objective criteria such as quality, price, service, reliability, availability, technical performance, contract compliance, resource and energy efficiency and environmental impact. We comply with all local and legal requirements and compete fairly. In countries where national laws and regulations provide a lower level of protection, we will seek ways to comply with the principles of this Code. We comply with our obligations to prevent money laundering and minimise the general risk of money laundering through careful screening of third parties. We act with integrity in our business relationships and expect our business partners to do the same. We do not tolerate corruption or bribery in any form. Accepting and giving gifts, invitations and commissions should be done in accordance with internal guidelines. Intellectual property rights must be respected; technology and knowledge transfer must be conducted in a manner that protects intellectual property rights and customer information.

Product Quality and Safety

Our aim is to always provide our customers safe, high-quality and impeccable products. The products should also meet our customers' high standards of quality and sustainability. We take appropriate measures to manage potential risks, particularly with regard to consumers.

Data Protection and IT Security

We ensure strict confidentiality and careful compliance with applicable laws and regulations when collecting, storing, processing or transferring personal data about employees, customers or other third parties. IT systems are regularly used and data is processed in day-to-day business. This requires appropriate and tested security systems to ensure the protection of intellectual property and personal data.

Land Rights and Natural Resources

The land rights of the local population should be respected and protected in all activities in order to prevent land grabbing. Neither we nor our suppliers may deprive people of land, forests or bodies of water whose use secures their livelihoods in violation of legitimate rights. Harmful changes to the soil, water and air pollution, noise emissions and excessive water consumption must be avoided. The health of people must not be harmed and the natural basis for the production of food and drinking water must not be impaired.

3. Environmental Protection and Sustainability

We comply with all applicable environmental legislation and act in accordance with our internal environmental and sustainability policies. We strive to increase resource and energy efficiency in the production and distribution of our products and services through an appropriate management system and to minimise waste, emissions and other negative environmental impacts in our business and supply chain. We procure and use resources such as energy and water responsibly. Our business partners must also comply with these requirements and all relevant environmental legislation, hold all relevant environmental permits and monitor and minimise impacts on biodiversity and the climate.

4. Social and Working Conditions

Occupational Health and Safety

The health and safety of employees is ensured through suitable preventative occupational health and safety measures as well as a safe and healthy working environment. Statutory requirements for occupational health and safety and fire protection are complied with. Regular training and instruction is provided in the relevant areas. Every employee must comply with the applicable laws, regulations and internal company guidelines on occupational health and safety.

Working Conditions and Employee Rights

Equal rights and the promotion of diversity among employees are principles of our actions. Willy Benecke GmbH is committed to the ETI Base Code and thus also to the ILO Conventions. The ETI Base Code listed below is an internationally recognised set of labour standards, the principles of which must also be observed by Willy Benecke GmbH's business partners:

The ETI Base Code

1. Employment is freely chosen

- 1.1 *There is no forced, bonded or involuntary prison labour.*
- 1.2 *Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.*

2. Freedom of association and the right to collective bargaining are respected

- 2.1. *Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.*
- 2.2. *The employer adopts an open attitude towards the activities of trade unions and their organisational activities.*
- 2.3. *Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.*
- 2.4. *Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.*

3. Working conditions are safe and hygienic

- 3.1. *A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.*
- 3.2. *Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.*
- 3.3. *Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.*
- 3.4. *Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.*
- 3.5. *The company observing the code shall assign responsibility for health and safety to a senior management representative.*

4. Child labour shall not be used

- 4.1. *There shall be no new recruitment of child labour.*
- 4.2. *Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; “child” and “child labour” being defined in the appendices.*
- 4.3. *Children and young persons under 18 shall not be employed at night or in hazardous conditions.*
- 4.4. *These policies and procedures shall conform to the provisions of the relevant ILO standards.*

5. Living wages are paid

- 5.1. *Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.*
- 5.2. *All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.*

5.3. *Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.*

6. Working hours are not excessive

6.1. *Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.*

6.2. *Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. (International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.)*

6.3. *All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.*

6.4. *The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.*

6.5. *Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:*

- *this is allowed by national law;*
- *this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;*
- *appropriate safeguards are taken to protect the workers' health and safety; and*
- *the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.*

6.6. *Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.*

7. No discrimination is practiced

7.1. *There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.*

8. Regular employment is provided

8.1. *To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.*

8.2. *Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or homeworking arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.*

9. No harsh or inhumane treatment is allowed

9.1. *Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.*

The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

5. Complaint mechanisms and sanctioning of misconduct

Violations of this code of conduct, laws or other internal policies will not be tolerated. Misconduct will be consistently punished and sanctioned in accordance with legal requirements.

Willy Benecke GmbH maintains a defined complaints procedure that is accessible to all employees and third parties (business partners). Confidentiality of identity and effective protection against discrimination are guaranteed.

Employees have the right to report violations of this Code. Employees and third parties may contact the complaints office of Willy Benecke GmbH at any time:

hinweis@willy-benecke.com

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This is a translation of the German document *CoC - Verhaltenskodex*. The legally binding version is the German one.