

Code of Conduct for Business Partners

Introduction

GELITA is a company that carries out its business activities with the highest level of integrity, and is convinced that every GELITA employee and business partner deserves a dignified life. We also believe that all employees have a moral obligation to keep the environmental impacts resulting from GELITA's work or business partners' work as low as possible. We feel that when we all work together to do so, sustainable development is achievable. We believe that we can only be successful as a business if the impacts of GELITA's work and of our business partners' work are in harmony with the needs of people and nature. Therefore, GELITA expects its business partners to comply with all of the following principles and requirements and to address them correspondingly in their own business areas and with respect to their suppliers. For this reason, we request that you read this Code of Conduct for Business Partners carefully and sign it. If you have questions or suggestions, please see the relevant contact information on page 5.

Forced labor and reservation of documents

In accordance with the regulations of ILO Conventions 29 and 105, as well as Article 8 letters b and c of the international pact of December 19th, 1966, a GELITA business partner may neither tolerate, participate in, nor benefit from forced labor in any form (such as debt bondage, slavery, forced prisoner labor, any other bondage or human trafficking). Employees may not be forced to remain in the employment relationship which they have entered into in any way (for instance through reserving ownership or document, wages or other compensation to which they are entitled).

Minimum age

A GELITA business partner may not make use of or profit from child labor in accordance with the regulations of ILO Convention 138 and ILO Convention 182. The minimum hiring age should not be less than the age when compulsory education ends. In every case, the minimum hiring age must be at least 15 (or 14 if this is regulated by national law in accordance with the ILO exemptions for developing countries). In deviation from this, if permitted by national law, children between 12 and 15 may be employed for a few hours a day to carry out light work (student holiday work). This must be simple work of a limited scope, and may in no way conflict the children's obligations in relation to their schooling. Training programs/internships for children who have not yet reached the minimum age must be clearly intended for educational purposes (primary school student internships).

Discrimination, punishment, abuse and harassment

A GELITA business partner must protect their employees from any physical, verbal, sexual, or psychological harassment/abuse or relevant hazards at the workplace, whether from supervisors or other employees. This also includes identifying and implementing disciplinary measures under labor law.

In accordance with ILO Conventions 100 and 111, a GELITA business partner may not take part in, support, or tolerate discrimination in any manner, in particular due to the race of an employee, their skin color, their gender, their language, religion, political or other worldview, their membership in a caste, their national or social origin, their property, birth, membership in a trade union, sexual orientation, health status, family obligations, their age, disability, or any other personal characteristics. This means that all decisions related to hiring, wages, compensation, continued training, promotions, disciplinary measures/measures under labor law, terminations, retirement or other employment-related decisions may be made only based on relevant and objective criteria. Furthermore, a GELITA business partner may not violate the freedom of association nor carry out any forced clearing or illegal removal of land, forest, or waterways that secure the existence of any person. A GELITA business partner is not entitled to commission or make use of private or public security forces to protect a company project if this would violate the prohibition against torture and cruel, inhumane or degrading treatment, injure life and limb, or violate the freedoms of assembly and association.

Occupational safety standards

A GELITA business partner must ensure that they provide their employees with a safe, hygienic and healthy workplace in accordance with the occupational protection obligations that apply by law at the place of employment. This should offer protection against dangers including, but not limited to, fire, accidents and hazardous substances. Adequate occupational safety regulations, trainings, and protective clothing must be implemented and provided.

A GELITA business partner must create and implement emergency plans, in order to effectively protect against the health-related consequences of an accident for surrounding communities and the environment itself.

Compliance with and adherence to the law / legal conformity

A GELITA business partner must comply with and implement all of the laws and other applicable regulations that apply to them; this includes (but is not limited to): the right to assemble, the right to collectively bargain, regulations regarding working hours, overtime, break time regulations and regulations on concluding an employment contract.

Remuneration

A GELITA business partner must comply with and implement minimum wage regulations according to applicable law. Wages must be paid on a regular basis and in the applicable currency.

Existing employment relationships

A GELITA business partner must provide their employees with all benefits resulting from applicable laws, specifications, and other regulations. The business partner must respect the personal rights of their employees whenever business partners receive or collect personal data or introduce systems to monitor employees. Relevant data privacy regulations must be observed.

Environmental management

A GELITA business partner must be aware of current valid requirements under environmental law regarding their actions, products, services, and other activities. They must comply with all applicable laws, regulations and statutory requirements in the countries in which they work, and must observe internationally recognized environmental, social and corporate governance standards. They must also ensure compliance with environmental law regulations through training sessions, inspections, and audits.

A GELITA business partner must work continuously to minimize the environmental impacts resulting from their activities, products or services through a proactive approach and responsible management. This includes (not an exhaustive list):

- using scarce natural resources, water and energy, and associated with this causing harmful soil changes, water pollution, harmful noise emissions or excessive water consumption
- emissions into the atmosphere and wastewater discharge
- emitted noise, odors and dust
- the potential and actual danger of soil contamination
- waste management (hazardous and non-hazardous wastes)
- their products with respect to packaging, transportation, use and recycling/disposal
- Other products listed in accordance with the Minamata, Stockholm, POP, or Basel Conventions

A GELITA business partner must not unlawfully evict people and must not unlawfully deprive land, forests and waters in the acquisition or other use of land, forests and waters when these lands, forests or waters secure a person's livelihood.

A GELITA business partner must work to continuously improve and develop their sustainability performance.

Product liability

A GELITA business partner must use the care necessary, when designing, producing and manufacturing their products, to prevent product defects that could violate or threaten personal safety or have harmful impacts on the environment.

Fraud

A GELITA business partner may not take part in fraud or so-called “kick-back payments” or in any other practices defined as corruption, in order to exercise illegal influence on representatives of state authorities, jurisprudence, and/or private legal entities or natural persons. A GELITA business partner must comply with all applicable antitrust and competition laws and regulations.

Animal welfare

Livestock must be treated with respect, and our business partners must always comply with the so-called “five freedoms” of livestock farming. These are as follows:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury and disease
- Freedom from fear and distress
- Freedom to express normal behavior

The business partner is obligated to take all measures necessary to ensure that its suppliers comply with these standards as well.

Responsibilities of the business partner

A GELITA business partner must ensure that their employees, suppliers, contract manufacturers, etc. also comply with the principles set forth here.

Audit

GELITA companies are entitled to audit compliance with this Code of Conduct to a reasonable extent and based on relevant risks. Upon request by the GELITA company, the business partner must provide all necessary information and documents and must make it possible for GELITA companies to conduct on-site inspections of the business partner's operations following reasonable advance notice. GELITA companies can also commission a third party sworn to secrecy with conducting this audit. Data protection law regulations and the trade and company secrets of the business partner shall be respected. Audit rights resulting from other provisions shall remain unaffected. Upon request, the business partner shall grant subcontractors used to carry out its services relevant audit rights in favor of GELITA companies.

The business partner is obligated to report any violation of the human rights and environmental requirements set forth in the German Supply Chain Act. The business partner can use the publicly accessible and anonymous complaint process on GELITA's website to do so. The business partner is also obligated to take suitable measures to halt violations, and inform us of the measures taken upon request.

Policy statement

A GELITA business partner confirms, by their signature below, that they will comply with the standards expected pursuant to the current valid policy statement. These have been established by GELITA under the German Supply Chain Act. The current valid version is freely accessible on the GELITA website.

Rights of GELITA in Case of Violations

If the business partner violates their obligations under the above principles and regulations, either intentionally or in a grossly negligent manner, GELITA is entitled to terminate continuing obligations for good cause or withdraw from contracts that have not been fulfilled in full, if:

- The violation forms the basis of a serious human rights or environmental breach
- Collaboration to correct the violation (is rejected without reasonable cause) or the jointly developed concept does not result in improvement after a reasonable time period
- GELITA has no more lenient measure available to end the violation

For further information, or if you have questions or suggestions, please get in touch with your GELITA contact person or our Compliance department (compliance@gelita.com).

Confirmation

We hereby confirm that we will comply with the above mentioned requirements.

Date: _____

Company: _____

Name: _____

Position: _____

Signature: _____

Contact information will be used for inquiries or to get in touch for further information. With your signature, you hereby declare your agreement that the information may be used to contact you, including by third parties commissioned by GELITA to do so for this purpose. If the person listed is not responsible for this area, GELITA requests that you indicate the responsible person to us. If the contact information changes, the business partner must inform GELITA of this promptly.

References

The GELITA Code of Conduct for Business Partners is based on national laws and regulations such as the German Supply Chain Act (LkSG) and international conventions like the United Nations Universal Declaration of Human Rights, The Children's Rights and Business Principles, the UN Guiding Principles on Business and Human Rights, the international labor standards of the International Labor Organization, and the UN Global Compact. The principles of these regulations represent the minimum standards for our business relationships. The Code of Conduct for Business Partners is in particular based on the following international principles and guidelines:

- Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination Against Women
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- ILO Core Labor Standards
- Paris Climate Accords
- Minamata Convention
- Stockholm Convention
- Basel Convention
- The ten principles of the UN Global Compact (UNGC)