

# Code of CONDUCT

Fundamental rules for our business relationship



GRABENHORST  
& VETTERLEIN



Stahnsdorf, June 2022

We as Grabenhorst & Vetterlein work with wonderful companies and people with lots of opportunities. In order to preserve our success and partnerships in the long term, it is fundamental to follow clear and explicit rules and definitions. Thus, we expect a high degree of social and ethical competence from all our business partners. Responsible and lawful conduct should be a matter of course. This current Code of Conduct does not contain any new rules but rather illustrates the requirements placed upon our behavior in the discharge of our responsibilities. We will not tolerate actions that might lead to a violation of laws, nor will we, through inaction, allow such laws to be broken. Any exception is totally unacceptable, even if based upon conduct or customs in the sector or region. The following code of conduct defines the basic requirements and rules to the suppliers of Grabenhorst & Vetterlein, which offer products and services, about their responsibility to their stakeholders, the environment and includes the actions of their own supply chain back to the raw material. If the regulations contained here or international law and conventions differ from local regulations, the stricter regulation shall apply.

This code of conduct is based upon the following standards and guidelines in particular:

- The United Nations' (UN) Declaration of Human Rights
- The UN's Convention on the Rights of the Child
- The Organization for Economic Co-operation and Development's (OECD) Guidelines for Multinational Enterprises
- The International Labor Organization's (ILO) Fundamental Conventions
- Guiding principles on business and human rights

The following paragraphs of the complete document are not negotiable but in the center of our actions. The acceptance of every paragraph is binding.

Please fill out the whole document completely and send it back to:

[zentrale@grabenhorstundvetterlein.de](mailto:zentrale@grabenhorstundvetterlein.de)

## Part 1: Self-disclosure

Company Name: \_\_\_\_\_

Corporate Address / \_\_\_\_\_

Stamp: \_\_\_\_\_

Contact person: \_\_\_\_\_

Phone-Number: \_\_\_\_\_

Since when you work for us? \_\_\_\_\_

Questions to Management	yes	no	Remarks
Are you certified for Occupational Safety or for Social Accountability (e.g., SA 8000)? If yes, please attach a copy of the certificate.			
Are you certified for environmental or energy management? (e.g., ISO 14001 or ISO 50001 or any sustainability certification)? If yes, please attach a copy of the certificate.			
Do you work with a certified quality management? (ISO 9001) If yes, please attach a copy of the certificate.			
Which risk analysis instruments and measures do you use? (in order to detect and protect from risks, violating our rules of conduct)			
Do you keep records of problems with suppliers?			
Do you maintain a statistic about customer complaints or failure reports?			
Is the retractability of the products ensured?			

Do you have advice for the improvement of the customer-supplier relationship?

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## Part 2: Fundamental Rules of Conduct

The supplier herewith admits showing commitment to:

### 1) Fair competition

- ✓ free competition in the interest of all market participants
- ✓ prohibition of collusive pricing
- ✓ prohibition of abusing a market-dominating position
- ✓ collusive conduct, informal talks or agreements that might affect or facilitate a restraint of competition
- ✓ it is prohibited to exchange confidential information on prices

### 2) Prevention of corruption

- ✓ not tolerate any form of corruption or bribery or to even participate including payments or other forms of acceptance of benefits by public officials for the purpose of persuasion in violation of the law

### 3) Data protection

- ✓ protecting the personal data of employees and stakeholders
- ✓ complying with European and international data protection rules (GDPR)
- ✓ processing personal data only giving due consideration to individual interests and after assessing all data protection risks

### 4) Safety

- ✓ take responsibility for the health and safety of your employees
- ✓ avoidance and safe containment of risks hazardous to humans
- ✓ any production cost and product safety benefit analysis has to err on the side of product safety
- ✓ access to clean drinking water in sufficient quantities and access to clean sanitary facilities for all employees
- ✓ compliance with all safety regulations
- ✓ provide periodic training and instructions in matters of health, safety and efficient use of resources

## 5) Environmental responsibility

- ✓ acting in an environmentally conscious manner
- ✓ preservation of natural resources, diversity of species and the protection of our climate
- ✓ compliance with the applicable environmental rules and policies
- ✓ reduce environmental impact the lowest possible level, protect the environment from pollution of air, water and soil
- ✓ where possible, certify products with credible standards
- ✓ follow systematic approach to identify, handle, reduce, and responsibly dispose or recycle solid waste
- ✓ reduce Chemicals or other materials that pose a hazard when released into the environment
- ✓ document and monitor the energy usage and apply energy efficiency measures to reduce energy use

## 6) Social responsibility

- ✓ zero acceptance of any violation of human rights
- ✓ take care of adequate payment and to guarantee the statutory national minimum wage
- ✓ accept the maximum amount of working hours, which are defined in the laws
- ✓ where legally possible, tolerate the right of free association of employees and neither favor nor discriminate against members of employee organizations or unions

## 7) Discrimination ban

- ✓ treat all employees and business partners in a fair, polite and respectful manner
- ✓ discrimination based upon a person's colour, nationality, descent, sex, religion or creed, political leanings, age, disability, sexual orientation or other personal characteristics, i.e., without any material reason, should be prohibited
- ✓ promote equal opportunities for and treatment of employees
- ✓ respect the personal dignity of every person
- ✓ any form of unwanted physical contact is prohibited

## 8) Fair labor

- ✓ don't employ someone against his/her will and don't treat the employees unacceptably, such as psychological cruelty, sexual disruption or discrimination. Forbid such behavior, including in gestures, in speech and physical cruelty, sanctions, threat, abuse or exploitation
- ✓ prohibition of Child labor: don't employ workers under the age of 15. In countries which are Part of the developing country exception of the ILO Convention 138, no workers under 14 years of age

## 9) Freedom of association and right for complaints

- ✓ respect the right of workers to freedom of association, to join trade unions, to appeal to labor representation or to join works councils in accordance with local laws.
- ✓ workers must be able to communicate openly with management without fear of reprisal or harassment

## Part 3: Recognition

Herewith, we/I confirm the receipt and acceptance of every paragraph mentioned in this document.

Company name: \_\_\_\_\_

Location: \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_  
Name of the Managing Director (in block letters) Sign and Stamp