



Supplier Code of Conduct
August Vormann GmbH & Co.KG

ENNEPETAL,
MARCH 2023
VERSION 1.1

Prologue



VORMANN is a family-owned company with a proud tradition and a global presence. The company has been in business for 160 years and is committing to socially and ecologically responsible corporate governance. The management and shareholders of the VORMANN Group completely stand behind this and value this responsibility equally with the economic success of the group.

VORMANN strives to continuously optimise its responsibility for the protection of people and the environment and calls on its suppliers to contribute to this in the sense of the holistic approach, which also includes requirements from the Supply Chain Sourcing Obligations Act "LkSG". We also expect these commitments from our suppliers, business partners and employees.

In order to cooperate with VORMANN, suppliers agree to accept and document the following standards and regulations by signing the last page. This is also associated with our suppliers' efforts to ensure that their subcontractors also comply with our CODE OF CONDUCT.

Our CODE OF CONDUCT applies as the basis for all future business.

Compliance with the law



Applicable national and international law as well as the ILO Declaration on Fundamental Principles and Rights at Work form the framework for our business actions and decisions in the VORMANN Group. In order to comply with this framework at all times, we adhere to the relevant laws and directives.

In this context, lawful action always has priority for us, even if legal requirements and prohibitions appear to be inappropriate and uneconomical for us.

We treat our business partners fairly and comply with contracts, considering changes in the framework conditions.



Principles - 1/2



Privacy

Our handling of personal data concerning our employees as well as suppliers, customers and other business partners is always confidential and in compliance with the General Data Protection Regulation. We remain bound by these principles even after the termination of employment and business relationships.

Compliance with legal regulations and rules

All VORMANN employees agree to comply with all applicable laws and regulations of the countries in which they conduct business.



Protection of third party intellectual property

Employees of our company treat the intellectual property of third parties in a dutiful and respectful manner.



Principles – 2/2



Protection of business secrets and company property

All tangible and intellectual property provided by VORMANN is used exclusively for business activities. Everyone involved in the business process is required to handle this property properly and with care and to protect it from loss, damage, theft and destruction. Business data of the company must be treated confidentially by all employees of VORMANN and must be protected against unauthorised persons obtaining or viewing it. Employees who have access to business secrets are obliged not to disclose them to third parties. This also includes persons from the family circle as well as the circle of friends / acquaintances. The use of such information for other purposes beyond the scope of business is also prohibited.

Social responsibility (1/4)

(§ 2 Abs. 2 LkSG)



Exclusion from forced labour

(§ 2 Abs. 2 Nr. 3, 4, 11 // ILO- Principles 29 und 105)

VORMANN does not accept forced labour, slavery or any such comparable work. All work must be voluntary and without threat of punishment. Workers must be able to terminate the work or employment relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardness, sexual and personal harassment and humiliation. Special attention must be paid to the use of security forces in crisis areas. The hiring or use of private or public security guards for the protection of the company's project is prohibited if, due to a lack of instruction or control on the part of the company, the use of the security guards violates any of the principles set out in this Code of Conduct.

Prohibition of child labour

(§ 2 Abs. 1, 2 LkSG // ILO- Principles 79, 138, 142 und 182)

VORMANN does not accept child labour. The employment of a child under the age at which compulsory schooling ends according to the law of the place of employment is prohibited, whereby the age of employment must not be less than 15 years. This does not apply if the law of the place of employment deviates from this in accordance with Art. 2 Para. 4 and Art. 4 to 8 of Convention No. 138 of the International Labour Organisation of 26.06.1973 concerning the minimum age for admission to employment.

Social responsibility (2/4)

(§ 2 Abs. 2 LkSG)



Fair compensation

(§ 2 Abs. 2 Nr. 8 LkSG // Principles 26 und 131)

Compensation, including wages, overtime and additional benefits, shall be at least at or above the level specified in applicable law and legislation. Workers shall be provided with all benefits required by law and clear, detailed and regular written information on the composition of their remuneration.

Fair Working times

(ILO- Principles 1 und 14)

Working hours must comply with applicable laws and regulations or industry standards. Overtime is only permitted within the framework of legal provisions.

Social responsibility (3/4)

(§ 2 Abs. 2 LkSG)



Freedom of association

(§ 2 Abs. 2 Nr. 6 LkSG // ILO- Principles 87, 98, 135 und 154)

The right of workers to form and join organisations of their choice and to bargain collectively has to be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative opportunities for independent and free association of workers for the purpose of collective bargaining shall be provided.

Prohibition of discrimination

(§ 2 Abs. 2 Nr. 7 LkSG // ILO- Principles 110, 111 und 159)

Discrimination against employees in any form is prohibited. This applies, for example, to discrimination based on gender, race, caste nationality, ethnic and social origin, skin colour, disability, health status, political conviction, origin, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

Social responsibility (3/4)

(§ 2 Abs. 2 LkSG)



Health, safety at work

(§ 2 Abs. 2 Nr. 5 LkSG // ILO- Principles 155 und 164)

A safe and healthy working environment has to be provided. Necessary precautions against accidents and damage to health that may arise in the context of the activity must be taken through the establishment and application of appropriate occupational health and safety systems. Excessive physical or mental fatigue has to be prevented by appropriate measures. In addition, employees must be regularly informed and trained on applicable health and safety standards and measures. Employees have to be provided with access to drinking water in sufficient quantity and access to clean sanitary facilities.

Conservation of the natural basis of life

(§ 2 Abs. 2 Nr. 9 und 10 LkSG)

The employer may not, in violation of legitimate rights, take away land, forests or bodies of water if their use secures the livelihood of people. He must refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this damages people's health, significantly impairs the natural basis for food production or prevents people from accessing clean drinking water or sanitary facilities.

Social responsibility (4/4)

(§ 2 Abs. 2 LkSG)



Complaints Procedure

(§ 8 Abs. 1 LkSG)

Companies must ensure that an appropriate internal company complaints procedure is in place. The complaints procedure enables people to point out human rights and environmental risks and violations of such risks that have arisen through the economic activities of a company in its own business area or a direct supplier. The complaints procedure must be accessible to all persons involved in the business process, while maintaining confidentiality of identity and effective protection against discrimination.

Notice

For information and complaints regarding possible violations of our human rights and environmental due diligence obligations, please contact:

compliance@vormann.com

or

August Vormann GmbH & Co.KG
Compliance Manager
Heilenbecker Straße 191 – 205
58256 Ennepetal
Germany

Environmental Responsibility

(§ 2 Abs. 3 LkSG)



Environmental protection and resources

We are committed to complying with environmental regulations and international standards to protect our environment. These include measures for:

- Treatment and discharge of industrial waste water
- Handling air emissions
- Handling of waste and hazardous substances
- Reducing the consumption of raw materials and natural resources
- Handling energy consumption/efficiency

and expect the same behavior from our suppliers!



Ethical Business Conduct



Prohibition of corruption and bribery

VORMANN is strongly opposed to corruption and bribery and does not tolerate any conduct in which business activities are conducted by improper means. The acceptance and giving of favours to business partners is not permitted, as these can lead to an impairment of an objective and fair business decision. Occasional and promotional gifts as well as gifts that correspond to the customs and courtesies of other cultures are subject to the generally applicable exception rule.

Fair Competition

VORMANN is interested in fair and undistorted competition in strict compliance with competition and antitrust law. We therefore do not take part in measures that harm our business partners or benefit us in an impermissible business manner. The division of customers or sales territories among business partners or third parties as well as agreements regarding non-competition are also inadmissible.

Implementation of the requirements



Risk identification

VORMANN expects from its suppliers to identify risks within the supply chains and to take appropriate measures to eliminate them. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier will inform VORMANN promptly and, if necessary, regularly about violations and risks as well as about the measures taken.

Preventive measures

VORMANN verifies compliance with the standards and regulations listed in this document by means of a self-assessment questionnaire and risk-based audits at the supplier's manufacturing locations. The supplier agrees that VORMANN may conduct such audits on a regular basis or for specific reasons to verify compliance with our CODE OF CONDUCT at the supplier's production sites during normal business hours after VORMANN or persons commissioned by VORMANN have given reasonable advance notice. Recognisable violations of the principles and requirements of the CODE OF CONDUCT must be reported!

Remediation

In case of an infringement of the principles of this Code of Conduct, VORMANN will inform the supplier in writing within one month and set a reasonable period of grace to bring the supplier's behaviour in line with the principles of this Code of Conduct.

Awareness and acceptance



Ennepetal, 19.05.2023

Place, Date

A handwritten signature in blue ink, appearing to read "Ulf Günther", written over a horizontal line.

Signature

August Vormann GmbH & Co. KG
Postfach 15 52
58244 Ennepetal

Company & Address

Ulf Günther, Thomas Vormann / CEOs

Name & Job title of the signatory