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Code of Conduct

The Code of Conduct is geared towards the internationally recognised principles for the protection of human and labour rights as expressed in the United Nations Universal Declaration of Human Rights, the ILO Core Labour Standards, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

In addition, the Code of Conduct is based on relevant international agreements for the protection of the environment.

1. Human rights and Labour Standards

We respect human dignity and internationally recognised human rights, as set out, in particular, in the United Nations (UN) Universal Declaration of Human Rights and addressed in the UN Guiding Principles on Business and Human Rights ², and the OECD Guidelines for Multinational Enterprises. We also take into account the internationally recognised labour standards of the International Labour Organization (ILO), as set out below in the Code of Conduct.

In all our business activities, we strive at all times neither to cause nor to contribute to human rights violations. We expect the same from our business partners. Where necessary and possible, we support our supply partners in this regard.

1.2 Employment Relationships

We treat our employees with respect. We reject any form of unlawful punishment, abuse, harassment, intimidation or other undignified treatment towards employees.

We comply with applicable labour laws in all employment relationships, and expect our employees to do the same. At the beginning of the employment relationship, comprehensible information is made available to employees about the essential terms and conditions of employment, including their rights and obligations as well as working hours, remuneration and payment and settlement terms.

We respect and protect the right of workers to terminate their employment in accordance with the applicable notice period.

1.3 Prohibition of child labour and protection of young workers ⁴

We do not tolerate child labour, and respect the applicable legal minimum working age. In any case, we do not employ persons under the age at which compulsory education ends according to the law of the place of employment, and under the age of 15.

We expect our contracting parties to have in place adequate means of determining age to prevent child labour. Should child labour be identified, all necessary measures must be taken without delay, focusing on the best interests, protection and development of the child.

- 1. Universal Declaration of Human Rights
 - 2. UN Guiding Principles on Business and Human Rights
 - 3. OECD Guidelines for Multinational Enterprises
 - 4. ILO Conventions 138 and 182

In the case of persons under 18 years of age, the rights of young workers must be respected. They may only be employed if assurances are given that the conditions of work and employment neither pose a risk to their health, safety or morals, nor are harmful to their development.

1.4 Prohibition of forced labour ⁵

We reject any form of forced or compulsory labour, including any form of bonded labour, servitude, slavery or practices similar to slavery, trafficking in human beings or other involuntary labour and services that are inconsistent with internationally recognised labour and social standards.

1.5 Remuneration ⁶

We comply with the statutory provisions or, where applicable, the provisions of collective agreements in respect of the remuneration of labour services. We ensure that the wages we pay do not fall below the applicable statutory or applicable collectively agreed minimum wage, or the minimum wage that is customary in the industry. In countries or regions without a statutory or collectively agreed wage framework, we take special care to ensure that the wage paid is sufficient for a regular full working day to meet employees' basic needs. We do not tolerate wage deductions that are not permitted by law, including wage deductions as a disciplinary measure.

1.6 Working hours ⁷

We comply with the legal or applicable collective agreement provisions on working hours, including overtime, rest breaks and recreational leave. In any case, we ensure that

- → The regular weekly working hours do not exceed 48 hours plus a maximum of 12 hours overtime each week,
- → The right to rest breaks is respected on each working day,
- → Six consecutive working days are regularly followed by one day off; and
- → Public or religious holidays and leave are respected.

Overtime shall be compensated or remunerated at least in accordance with the law or collective agreements. It shall be ordered in exceptional cases and exclusively on a legal, collective or contractual basis.

^{5.} ILO Conventions 29 and 105

^{6.} ILO Conventions 26 and 131

^{7.} ILO Convention No. 1; ILO Recommendation No. 110

1.7 Freedom of association 8

We respect the right of workers to freedom of association and the right to collective bargaining, insofar as this is legally permissible and possible in the respective country of employment. If this is not permissible, we seek appropriate compromises for our employees.

1.8 Diversity and inclusion, non-discrimination ⁹

We promote a work environment that enables inclusion and values the diversity of our employees. We are committed to equal opportunities and reject any form of discrimination or unjustified unequal treatment in employment, for instance on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief. Furthermore, we take into account the principle of equal pay for male and female workers for work of equal value.

1.9 Health and safety at work ¹⁰

We comply with national and international occupational health and safety standards, and provide a safe and healthy working environment to maintain our employees' safety and health, protect third parties and prevent accidents, injuries and work-related illness. This includes regular workplace risk assessments and implementation of appropriate hazard prevention and precautionary measures, including the provision of appropriate personal protective equipment. We ensure that our employees are trained in all relevant occupational health and safety topics.

^{8.} ILO Conventions No. 11, 87, 98, 135 and 141

ELO Conventions No. 100, 111 and 159; ILO Recommendation No. 165

^{10.} ILO Conventions No. 155, 183 and 184; ILO Recommendation No. 164

2. Ecological Responsibility

Protecting and preserving the natural basis of life affects us all, and compels us to take action. With that in mind, we conduct our business activities with due regard for ecological aspects, and are committed to the goal of a climate-neutral future.

2.1 Protecting the environment and climate

We honour our ecological responsibility by complying with applicable legal requirements and recognised standards for the protection of the environment and climate, and by making efforts to continually improve the impact of our business activities on the environment and climate. We have taken appropriate measures that are guided by legal and internationally recognised standards and cover, including the following topics:

- → Professional and responsible handling of hazardous substances and other chemicals and waste, including disposal;
- → Efforts to reduce or avoid waste and minimise emissions from operations (e.g. wastewater, exhaust air, noise and greenhouse gases);
- → Conservation of natural resources, for example by way of water conservation measures , chemicals and other raw materials;
- → Conservation of natural resources, for example by way of measures to save water, chemicals and other raw materials;
- → Promotion of the use of climate- and other environmentally friendly technologies, processes, raw materials and products;
- → Efforts to increase energy efficiency and the share of green or renewable energies in energy consumption at our company locations.

2.2 Animal and species protection

We observe the principles for the protection of animals and biodiversity and align our corporate actions accordingly. Keeping and using animals must comply with the applicable legal animal welfare requirements, and be species appropriate. The Washington Convention on International Trade in Endangered Species of Wild Fauna and Flora ¹¹ is to be observed.

3. Ethical Business and Integrity

We exclusively pursue legitimate business objectives and practices, and only maintain business relationships with reputable partners. Our conduct in dealings with our business partners and customers is characterised by fairness and respect. We respect the different legal, economic, social and cultural backgrounds and circumstances of the countries and regions in which we operate. We base our business activities at all times on universally valid ethical values and principles, including integrity and respect for human dignity. We support free and fair global trade and comply with the laws and regulations of the countries and regions in which we do business.

3.1 Corruption ¹², Trade Control, Money Laundering

We reject all forms of bribery and corruption and avoid even the appearance of it, whether in the form of granting or accepting unfair advantages. We act in accordance with applicable import and export control regulations, and comply with legal requirements for the prevention of money laundering.

3.2 Fair competition

We support free and fair competition. We do not tolerate anti-competitive agreements, and ensure that we act in accordance with applicable anti-trust laws. We reject competitive advantages through unfair business practices.

3.3 Personal data, protection of confidential information and intellectual property

We respect the privacy rights of our employees, business partners and customers, and comply with applicable legal and regulatory requirements for the processing of personal data and information security when handling personal information. We take great care to ensure that business secrets and other confidential information of our business partners and customers entrusted to us are adequately protected against unauthorised acquisition, use and disclosure, at least in accordance with the relevant legal provisions on the protection of business secrets. We respect the intellectual property of our business partners, customers and other third parties and, when forwarding know-how and technologies, ensure that sufficient precautions are taken to protect intellectual property rights.

12. United Nations Convention against Corruption

3.4 Consumer interests

Where our products and services affect the interests of consumers, we have adopted appropriate measures to ensure the safety and quality of the products or services we provide. In that respect, we ensure that our products or services comply with the relevant statutory consumer protection provisions. In the context of information and sales measures, we take consumer interests into account by applying fair business, marketing and advertising practices, and by educating consumers. We pay special attention to the interests of children, senior citizens, people with disabilities and other vulnerable consumer groups.

4. Implementation

We make appropriate and reasonable efforts to comply with the contents of the Code of Conduct on an ongoing basis at all our company locations. To that end, we have put in place suitable measures and processes, and appropriately document their implementation within the company. The company gains information at regular intervals about the implementation and work of the responsible departments and persons.

4.1 Communication and training

We communicate the contents of the Code of Conduct to our employees, business partners and other key stakeholders and train our employees on individual topics of the Code of Conduct as required. We expect our employees to comply with the Code of Conduct.

4.2 Expectations of our supply chains, control measures

The content of the Code of Conduct also reflects our expectations of our supply partners and other contractual partners in our supply chains. Insofar, we expect them to be guided by the contents of the Code of Conduct or to apply a comparable code of conduct, and encourage them for their part to expect the same from the contracting parties in their supply chain.

As a matter of principle, we rely on long-term business relationships based on partnership. We, therefore, identify and check our contracting parties in an appropriate manner before we enter into a supply relationship, for example by way of self-disclosure, supplier evaluation or the like.

We reserve the right to monitor our supplier partners' compliance with our expectations, e.g. by way of auditing. If serious violations are identified, we reserve the right to implement appropriate contractual consequences, including termination of the business relationship. In any case, we expect that identified violations shall prompt a response characterised by appropriate preventive or remedial measures.

4.3 Reporting violations

We take every violation of the Code of Conduct seriously. In the event that violations are reported, we initiate measures for proper and confidential clarification and, if necessary, take appropriate countermeasures within the meaning of remedial or preventive action.



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