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CLASSEN Group • Werner-von-Siemens-Str. 18-20 • D-56759 Kaisersesch

Kaisersesch, 17.10.2022

## Classen Group Supplier Code of Conduct

Ladies and gentlemen,

With its products, the Classen Group is particularly synonymous with doing business in an environmentally compatible, sustainable, innovative, and forward-thinking manner. At CLASSEN, we place utmost importance on ensuring that our decisions and projects focus on the well-being of the end user.

All our products are "Made in Germany". This enables us to make a significant contribution to the creation and safeguarding of jobs and general compliance with human rights.

As a family business we are also using this approach to assume responsibility for future generations and ensure today that our business activities will continue to comply with the law in the future.

The Supply Chain Act (Lieferkettensorgfaltspflichtengesetz) will enter into force on 01.01.2023. This also formally imposes certain obligations on us with regard to our business relationships.

The legislation of the Supply Chain Act is primarily pursuing the goal of preventing or eliminating human rights violations and violations of environmental obligations in the supply chains of companies.

We have listed the requirements that we place on you in this regard as our supplier and business partner in our following Supplier Code of Conduct for the entire Classen Group and ask you to confirm to us in writing that you will comply with these standards.

W. CLASSEN N GmbH & Co. KG is a company of the CLASSEN Group • [www.classengroup.com](http://www.classengroup.com)  
Legal form: Limited Partnership (Kommanditgesellschaft) Headquarters: Kaisersesch / Comm. Reg. 4591 Local Court Koblenz Sales Tax ID no. DE 12507806  
Ind. liable partner: Dr Hannig GmbH Headquarters: Kaisersesch / Comm. Reg. 4789 Local Court Koblenz Man. Director: Dr Hans-Jürgen Hannig • Stefanie Quervel

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## **1. Respect for human rights**

Classen expects its suppliers to support and respect the protection of human rights. For this reason, we require you to comply with applicable international human rights standards, in particular the European Convention on Human Rights, the principles of the UN Global Compact, the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines.

### **Dealing with child and forced labour**

Our suppliers must not allow, support or benefit from child or forced labour. It is essential to comply with country-specific laws in addition to international standards.

## **2. Conduct towards employees and terms and conditions of employment**

Our suppliers must observe the respectively applicable employee rights and, in particular, comply with the applicable laws, agreements and industry standards with regard to working hours and the remuneration of their employees. Discrimination in hiring and employment must not be tolerated, nor should harassment, abuse or extortion in the workplace.

## **3. Discrimination**

The diversity of our employees is an indispensable added value for us as a company. Thus, we ensure that no person is discriminated against in any manner. As such, our suppliers are also committed to ensuring that no individual within their sphere of influence experiences any kind of discrimination, for example, on the basis of birth, caste, ethnic origin, nationality, race, sexual orientation, religion, disability, political affiliation, membership of a particular group, or gender.

## **4. Health protection and occupational safety**

Suppliers must comply with applicable health and occupational safety laws and ensure appropriate occupational safety management. Risks must be identified and assessed, and appropriate protective measures must be taken.

## **5. Competition/antitrust law**

It is important to Classen to promote fair trade and thus contribute to a stable economy. Therefore, we oblige our suppliers and business partners not to violate applicable competition and antitrust laws and to establish mechanisms to ensure compliance throughout the company. In particular, this includes unlawful competition constraints, such as the formation of cartels and price-fixing agreements.

## **6. Undeclared work**

Our suppliers are committed to only hire employees who can produce a valid employment contract that complies with the respectively applicable minimum legal requirements.

## **7. Corruption**

The Classen Group rejects all forms of bribery or granting of advantages. Thus, we require that our suppliers reject granting or accepting any benefits in their dealings with public officials, authorities, clients or similar persons so as to obtain or grant unfair competitive advantages that go beyond the legally permissible level of socially adequate courtesies.

## **8. Environmental protection / sustainability**

Classen expects its suppliers to comply with applicable environmental laws, regulations and standards, to maintain an appropriate environmental management system, and to ensure the efficient use of raw materials. Classen also expects its suppliers to support a preventive approach in dealing with environmental problems, to take initiatives to create a sense of responsibility for the environment and to promote the development and dissemination of environmentally friendly technologies. We also expect our business partners to design their procurement and manufacturing processes in a sustainable manner. All applicable local laws and regulations regarding hazardous materials, chemicals, and substances must be followed. Suppliers must comply with material restrictions and product safety requirements governed by applicable laws and regulations.

## **9. Compliance obligation**

To be able to ensure that the aforementioned standards and the respective applicable legal norms are observed, we require our suppliers to establish suitable and appropriate monitoring mechanisms and communication channels, i.e., a suitable compliance management system.

If you identify the risk of contributing to human rights violations through the business activities within your company or with one of your suppliers, appropriate countermeasures must be taken. In this case, you are also required to inform us of the identified risk immediately. In connection with the duty to comply with our standards, you are required to impose the same or equivalent standards on your business partners and suppliers.

Our suppliers are required to provide us with information upon request and to explain the extent to which they have implemented mechanisms in their company to prevent and eliminate legal violations.

**10. Legal consequences of violations**

In the event of a violation of our specified standards, we reserve the right to impose sanctions on our suppliers in relation to the severity of the violation. In the event of minor violations, our suppliers shall first be given the opportunity to take appropriate remedial action within a reasonable period of time.

However, in the event of a repeated or serious violation of these standards, such a violation may result in the termination of the business relationship without notice and to claims for damages.

**11. Applicable legal regulations**

This Code of Conduct shall be based in particular, but not exclusively, on the legal principles set out in the Annex in their respectively valid version or on any successor regulations.

Acknowledged and accepted as binding:

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City, date

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Signature

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Company name & address

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Name & job title  
of the undersigned

## **Annex – Legal bases**

1. Supply Chain Act (Lieferkettensorgfaltspflichtengesetz)
2. Convention No. 29 of the International Labour Organisation of 28 June 1930 concerning Forced or Compulsory Labour (Federal Law Gazette 1956 II, pp. 640, 641) (ILO Convention No. 29)
3. Protocol of 11 June 2014 to Convention No. 29 of the International Labour Organisation of 28 June 1930 concerning Forced or Compulsory Labour (Federal Law Gazette 2019 II, p. 437, 438)
4. Convention No. 87 of the International Labour Organisation of 9 July 1948 concerning Freedom of Association and Protection of the Right to Organise (Federal Law Gazette 1956 II, pp. 2072, 2071) as amended by the Convention of 26 June 1961 (Federal Law Gazette 1963 II, pp. 1135, 1136) (ILO Convention No. 87)
5. Convention No. 98 of the International Labour Organisation of 1 July 1949 concerning the Application of the Principles of the Right to Organise and to Bargain Collectively (Federal Law Gazette 1955 II, pp. 1122, 1123) as amended by the Convention of 26 June 1961 (Federal Law Gazette 1963 II, pp. 1135, 1136) (ILO Convention No. 98)
6. Convention No. 100 of the International Labour Organisation of 29 June 1951 concerning Equal Remuneration for Men and Women Workers for Work of Equal Value (Federal Law Gazette 1956 II, pp. 23, 24) (ILO Convention No. 100)
7. Convention No. 105 of the International Labour Organisation of 25 June 1957 concerning the Abolition of Forced Labour (Federal Law Gazette 1959 II, pp. 441, 442) (ILO Convention No. 105)
8. Convention No. 111 of the International Labour Organisation of 25 June 1958 concerning Discrimination in Respect of Employment and Occupation (Federal Law Gazette 1961 II, pp. 97, 98) (ILO Convention No. 111)
9. Convention No. 138 of the International Labour Organisation of 26 June 1973 concerning Minimum Age for Admission to Employment (Federal Law Gazette 1976 II, pp. 201, 202) (ILO Convention No. 138)
10. Convention No. 182 of the International Labour Organisation of 17 June 1999 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Federal Law Gazette 2001 II, pp. 1290, 1291) (ILO Convention No. 182)

11. International Covenant of 19 December 1966 on Civil and Political Rights (Federal Law Gazette 1973 II, p. 1533, 1534)
12. International Covenant of 19 December 1966 on Economic, Social and Cultural Rights (Federal Law Gazette 1973 II, p. 1569, 1570)
13. Minamata Convention on Mercury of 10 October 2013 (Federal Law Gazette 2017 II, pp. 610, 611) (Minamata Convention)
14. Stockholm Convention on Persistent Organic Pollutants of 23 May 2001 (Federal Law Gazette 2002 II, p. 803, 804) (POPs Convention), as last amended by the resolution of 6 May 2005 (Federal Law Gazette 2009 II, p. 1060, 1061)
15. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Federal Law Gazette 1994 II, pp. 2703, 2704) (Basel Convention), as last amended by the Third Regulation Amending Annexes to the Basel Convention of 22 March 1989 of 6 May 2014 (Federal Law Gazette II, p. 306/307)