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# Code of Conduct for Suppliers

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Sustainability is an essential element and integral part of our business strategy



# 01 Introduction

As a family-owned company, Blechwarenfabrik Limburg ("BL") maintains a trusting relationship with its business partners. We are guided by aspects such as ethics, sustainability, integrity and lawful conduct. We expect the same behavior from our business partners.

# 02 Social responsibility

Suppliers are committed to fulfilling their social responsibility towards employees and the community in the broader sense. It is important for us to respect the following aspects:

### Prohibition of child labor

We reject child labor in our supply chain. Suppliers must avoid any form of child labor in their companies. The definition of child labor is based on the core labor standards of the International Labor Organization (ILO) and the principles of the UNGC. According to these, the age should not be lower than the age at which compulsory education ends and in any case not lower than 15 years. If a local law prescribes a higher legal minimum age for workers or a longer compulsory schooling period, the higher age shall apply.

### Prohibition of forced labor

No forced labor, slave labor or such comparable labor may be used. All work must be voluntary. Practices such as withholding personal property, passports, wages, education certificates, employment or other documents for improper reasons are not acceptable. Further, employees must be able to leave work or employment at any time. Furthermore, no worker may be subject to unacceptable treatment such as psychological cruelty or sexual or other personal harassment.

### Prohibition of discrimination and unequal treatment

Discrimination against employees in any form is prohibited. This applies, for example, to discrimination based on gender, race, skin color, disability, political opinion, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

### Exercise of employee rights

Suppliers undertake to respect the applicable laws and regulations for the protection of employees and guarantee them the active exercise of their rights.

### Working hours and remuneration

Suppliers undertake to comply with the applicable laws and regulations on the restriction of working hours and the granting of rest periods and breaks as well as vacations. Suppliers further undertake to compensate their employees in accordance with the applicable laws and regulations and to guarantee them equal pay for work of equal value.

### Conflict minerals

Suppliers undertake to comply with the applicable laws and regulations on conflict minerals. Tinplate suppliers commit to conduct due diligence within their global supply chains. Should products (except tinplate) manufactured and/or supplied by our suppliers contain tin, tantalum, tungsten or their ores or gold, this must be reported to BL immediately and without being requested.

### Creation of notification possibilities regarding unlawful conduct

Suppliers shall promote and establish communication channels for their employees to file complaints or report possible unlawful conduct without fear of repression, intimidation or harassment. Suppliers must investigate and take action, if necessary, based on the reports.

If at any time a supplier or one of its employees believes that a BL employee has violated these principles, the supplier or its employee should report this to us via [complaintsprocedure@blechwaren-limburg.de](mailto:complaintsprocedure@blechwaren-limburg.de).

## **03 Occupational Health and Safety**

Suppliers are responsible for providing a safe and healthy work environment to maintain the health of their employees, protect third parties and prevent accidents, injuries and work-related illness. Furthermore, suppliers undertake to train their employees adequately on all occupational health and safety topics, in a language they understand.

## **04 Environmental obligations and ecological responsibility**

Suppliers agree to comply with applicable environmental laws, regulations and standards. Negative impacts on the environment and climate caused by suppliers themselves or within their supply chain should be minimized or prevented as far as possible at the point of origin. Insofar as environmental laws, environmental regulations and environmental standards contain reporting or other cooperation obligations on the part of suppliers, suppliers shall comply with these reporting or other cooperation obligations on their own initiative, in full and within prescribed deadlines. Suppliers shall use natural resources (e.g., water, energy sources, raw materials) sparingly and conserve them. In order to conserve renewable natural resources, suppliers shall support the application of generally accepted sustainability standards and certifications developed by various societal stakeholders.

Their practices shall comply with circular economy principles, such as material reduction and substitution, as well as return, shared use, maintenance, reuse, remarketing, remanufacturing, and recycling. Suppliers shall be committed to the development and use of environmentally and climate friendly products, processes and technologies. Suppliers shall also ensure continuous environmental improvements. This includes reducing raw material and energy consumption, emissions, effluents, noise emissions, waste, and dependence on natural resources and hazardous substances - using clear targets and improvement strategies.

## 05 Other Compliance Aspects - Ethical Business Conduct

Suppliers are committed to acting lawfully and with integrity in their business dealings. This includes the following topics in particular:

### **Integrity in business transactions**

Suppliers shall prohibit and shall not practice or tolerate corruption, extortion, embezzlement, misappropriation and money laundering in any form. Suppliers must not offer or accept bribes or other unlawful inducements (e.g., kickbacks) in business dealings with business partners or public officials. Suppliers may not offer BL employees gifts or other benefits for personal gain that could be considered a bribe. From the point of view of BL, an advantage is inadmissible if its type and scope is suitable for influencing the actions and decisions of the recipient. As a matter of principle, gifts or hospitality must not be used to unfairly influence a business relationship and must not violate applicable laws or ethical standards.

### **Fair and equitable competition**

Suppliers undertake to behave fairly and honestly in competition and to comply with the applicable competition laws, in particular anti-trust laws. In particular, price agreements with competitors, market sharing with competitors and the abuse of a dominant position through price discrimination and other conduct will not be tolerated.

### **Protection of business secrets**

Suppliers undertake that business information, in particular technical, financial or competition-related information, will always be treated confidentially and in accordance with any non-disclosure and confidentiality agreements. Suppliers are required to take appropriate precautions to protect such information.

### **Import & Export Control**

Suppliers agree to comply with all applicable export controls, sanctions, customs laws and regulations, including applicable trade restrictions, embargoes and other restrictions on the import and export of goods, services and information. In particular, Suppliers agree to ensure that they themselves, their beneficial owners, any of their agents and other subcontractors used by them are not listed on any applicable sanctions list as a sanctioned entity and/or person.

## 06 General regulations

In the event of suspected violations of the standards and regulations set forth in the Supplier Code of Conduct, as well as to safeguard the supply chain, suppliers agree that BL may conduct audits to verify compliance with the Supplier Code of Conduct during normal business hours after reasonable advance notice.

Suppliers shall provide information to BL upon request. Any violation by a supplier of provisions of this Supplier Code of Conduct shall be considered a breach of material contractual obligations and shall give BL the right, but not the obligation, to take adequate action.

### **Implementation of requirements**

We expect our suppliers with respect to supply chains to identify risks within them as well as to take adequate measures. In case of suspected violations as well as to safeguard supply chains with increased risks, the company requires disclosure of supply chains.

The company verifies compliance with the standards and regulations listed in this document by means of a self-assessment questionnaire and, if necessary, sustainability audits at suppliers' production sites.

The company reserves the right to take appropriate measures against suppliers who do not meet these requirements, which may ultimately lead to the suspension or termination of a supply relationship.

# Declaration of the supplier

We hereby acknowledge receipt of the Supplier Code of Conduct and undertake to comply with the principles and requirements of the Supplier Code of Conduct. We also confirm that by signing it, this Supplier Code of Conduct becomes part of the existing contractual relationship(s) between us and Blechwarenfabrik Limburg. The supplier confirms that he effectively communicates the contents of this code to employees, agents, subcontractors and suppliers and assures that all necessary precautions are duly implemented. Should any contradictions arise between the Supplier Code of Conduct and the existing contractual relationship(s), the more extensive provision shall apply.

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Place, Date

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Supplier (company stamp, signature)

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Name (block capitals)

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Supplier declaration