



BUSINESS PARTNER
CODE OF CONDUCT

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PREAMBLE

As an international company, we rely on responsibility, trust, and sustainable conduct. Stable relationships with our partners along the supply chain are based on transparency, respect and a shared understanding of values.

In this Business Partner Code of Conduct (BPCOC), we pool our principles and expectations as a firm

and binding reference for cooperation with our business partners and their affiliates, as well as suppliers and subcontractors along the supply chain.

Please read this Business Partner Code of Conduct carefully, share it within your company and confirm compliance with inherent requirements with your signature.

LAWS AND REGULATIONS

For us, compliance with legal provisions, obligations and regulations is the basis of responsible action. We thus expect our business partners to also comply with all applicable laws, sanctions, import/export-related regulations, as well as customs and tax regulations, embargoes (issued by the European Union, the United Nations, the United States of America etc.) and contractual agreements, provided they do not collide with legal provisions applicable to us. Permits, certificates, licenses, and registrations required for business must be obtained and maintained carefully. This must be in line with both national law applicable to the registered office address of our business partners and national law applicable to local offices or facilities, in which services are provided. Please find an overview of the main conventions with regards to human rights and environmental standards in the attachment for your reference.

PRODUCT SAFETY AND QUALITY

Product safety and quality along the supply chain require joint efforts. Therefore, in the interest of our customers, we expect our business partners to apply appropriate practice for product safety (labelling, documentation, safety data sheets, etc.) and quality assurance within contractual agreements and certification specifications.

INTEGRITY IN BUSINESS TRANSACTIONS AND FAIRNESS IN COMPETITION

We expect our business partners to comply with applicable competition and antitrust laws and to make reasonable efforts to avoid conflicts of interest, corruption, extortion, embezzlement, bribery and money laundering in any form. Gifts, gratuities, benefits or entertainment must not unfairly affect a business relationship and must comply with applicable law. We expect our business partners to commit to fair competition in compliance with applicable competition and antitrust laws. Anti-competitive behavior, price fixing, corruption or collusion solutions or the inappropriate exploitation of a dominant position are not acceptable.

PRIVACY

We expect lawful, careful, and appropriate handling of CREMER-related data and documents, especially with regards to personal data. Data must be duly protected against unauthorized access or disclosure, amidst the principle of data economy and applicable Data Protection Regulations. This includes protection of intellectual property and confidentiality of trade and business specifics or data.

PROTECTING THE ENVIRONMENT: CAREFUL USE OF NATURAL RESOURCES AND CLIMATE PROTECTION

Sustainable protection of both environment and climate associated with resource efficiency are important to us and we hold relevant certificates for specific scopes (REDcert, RSPO, IntegrityNext, DE-ÖKO-006 etc.). In this context, we expect our business partners to protect natural resources in the best possible way and to refrain from inappropriate exploitation or destruction of the environment. We expect careful handling of hazardous materials, minerals and other substances and appropriate efforts to minimize exhaust fumes, sewage, waste, noise and light pollution. Climate protection should be a matter of course for our suppliers and should be reflected in purposeful action. If appropriate and available, we expect provision of CO₂ balance upon request.

All applicable laws relating to environmental impact, environmental protection and safe handling of hazardous materials must be complied with.

PROTECTION OF HUMAN RIGHTS

Protection of human rights is a priority for us. We thus expect our business partners to fully respect human rights and dignity, observe relevant laws and provisions and to treat all employees in the supply chain with equal respect.

CHILD LABOR AND FORCED LABOR

Any form of forced or compulsory labor, child labor, slavery or human trafficking within the supply chain is unacceptable to us and we expect our business partners to exclude this form of labor from operational processes. The same applies for debt or contract bondage or involuntary prison labor. Employees of our business partners must have the opportunity to part with their employer at their own discretion in compliance with legal provisions and deadlines.

FREEDOM OF ASSOCIATION

We expect our business partners to support open and free communication of their employees with employee representatives and – based on local laws – to respect all employees' freedom of association and their right to form, join (or not join) unions and to facilitate participation in union meetings. Employees who are active as employee representatives must not be disadvantaged or discriminated.

HEALTH AND SAFETY AT WORK

We expect our business partners to comply with applicable occupational health and safety regulations in the interest of their employees and employees of subcontractors.

DIVERSITY AND INCLUSION

We live and expect from our business partners a culture of equal opportunities and mutual respect. Equal and respectful treatment of employees and their protection against abusive behavior, regardless of gender, age, skin color, culture, ethnic, national, or social origin, sexual identity, potential handicaps, marital status, religion, ideology, political opinion or other characteristics must be natural.

REMUNERATION AND WORKING HOURS

We expect our suppliers to observe at least legal local standards when compensating their employees. Remuneration and statutory benefits must be paid timely and fully and should allow employees and their families an appropriate standard of living. Statutory working time regulations including overtime, break, rest, and vacation periods as well as sickness allowances must be observed. Labor Standards of the International Labor Organization (ILO) must be observed.

THIS BUSINESS PARTNER CODE OF CONDUCT IN THE SUPPLY CHAIN

In the interest of consistent compliance with the standards, expectations and obligations lined out in this BPCOC, we expect communication and case-based control of compliance with this BPCOC in the supply chain, if necessary and indicated.

COMPLIANCE CONTROL

We reserve the right to adequately review compliance with the obligations and expectations as lined out in this BPCOC. As our business partner, please adequately record compliance with the requirements of this BPCOC and cooperate with us in case of any violations. Please investigate any violations that may occur within your company or supply chain and solve them swiftly. Kindly share this information with us, so we can evaluate and discuss any adjustments together. Please note that we reserve the right to demand redress, compensation or indemnification from the consequences of the violation within reasonable time. In case of unsuccessful agreements or grace periods, we shall be entitled to terminate the contractual relationship within 3-month notice to the end of the month. In case of a severe breach of this BPCOC, implying that continuance of the contractual relationship can in all fairness not reasonably be expected until contract or notice period expiry and considering all circumstances and details specific to the case, under due consideration of mutual interests, we shall be entitled to terminate the contractual relationship without notice.

WHISTLEBLOWER SYSTEM

We expect our business partners to set up a communication channel for their employees and business partners that allows addressing reports, concerns and complaints, without entailing any negative consequences. Operations that may impair cooperation with us and awareness of any potential violations of this BPCOC must be shared with us promptly.

At <https://www.cremer.de/de/kontakt.html>, we at CREMER offer all employees, customers and business partners a channel to contact us anonymously via our whistleblower system in a protected space and to report events or incidents. All information is processed fairly and swiftly and handled confidentially.

CHOICE OF LAW, JURISDICTION

This BPCOC is liable to German law, excluding any conflicting rules that may require application of a different jurisdiction. Exclusive place of jurisdiction shall be Hamburg.

CONSENT

We hereby declare our consent to fully comply with the requirements of this Business Partner Code of Conduct. This includes consent on behalf of our affiliates and consent for all future business relationships between Peter Cremer Holding GmbH & Co. KG and affiliated companies.

DATE

COMPANY STAMP AND SIGNATURE

APPENDIX: IMPORTANT CONVENTIONS

- International Labor Organization Convention: Forced Labor Convention (No. 29), including protocols of 11.06.2014
- International Labor Organization Convention: Freedom of Association and Protection of the Right to Organize Convention (No. 87)
- International Labor Organization Convention: Right to Organize and Collective Bargaining Convention (No. 98)
- International Labor Organization Convention: Equal Remuneration Convention (No. 100)
- International Labor Organization Convention: Abolition of Forced Labor Convention (No. 105)
- International Labor Organization Convention: Discrimination (Employment and Occupation) Recommendation, 1958 (No. 111)
- International Labor Organization Convention: Minimum Age Convention, 1973 (No. 138)
- International Labor Organization Convention: Worst Forms of Child Labor Convention, 1999 (No. 182)
- International pacts of dec 19th 1966 on (1) civil and political rights and (2) economic, social and cultural rights
- Minamata-Convention on Mercury
- Stockholm Convention on POPs
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal

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