

# Code of Conduct for Suppliers



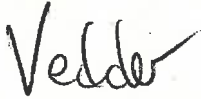
## CODE OF CONDUCT



## Foreword

Goletz GmbH is committed to honest and responsible business relationships. In this context, we expect our Suppliers to comply with the requirements described in this Supplier Code of Conduct ("Code"), which is based on the UN Global Compact. This Code sets out our principles and expectations for how organisations, including their representatives, employees and affiliates, that supply goods and services to Goletz ("Supplier") are to conduct business with us. We are committed to our Goletz - Code of Conduct and expect our Suppliers to fully comply with applicable laws and to adhere to internationally recognised environmental, social and corporate governance standards. We also expect our suppliers to communicate this Code to their employees, subcontractors and representatives and to ensure compliance.

Kierspe, 23rd March 2022



---

Michael Vedder



---

Dr. Rolf Danzebrink

**Goletz GmbH**

Management

## I. BUSINESS INTEGRITY

### **Compliance with laws and regulations**

The Supplier shall comply with all applicable national and international laws, rules and regulations in the countries in which they operate. This includes, but is not limited to, the following laws and regulations: Environment, Human Rights and Employment. Goletz also expects its Suppliers to comply with all generally accepted international standards listed herein. In the event that the applicable legal requirements are lower than the requirements set forth in this Code, Goletz expects the Supplier to comply with the higher standards.

### **Fair competition**

Goletz supports the rules protecting the free market and open competition. The Supplier shall conduct its business in compliance with all applicable competition and antitrust laws.

### **Anti-corruption and anti-bribery**

The Supplier shall not engage in or tolerate any form of corruption, extortion, embezzlement or bribery and shall comply with all applicable anti-corruption and anti-bribery laws, including Principle 10, (Anti-Corruption) of the UN Global Compact. The Supplier will not offer or accept benefits or other unlawful incentives to obtain an unfair or improper advantage.

### **Favours and gifts**

To a certain extent, it is acceptable in the world in which we operate for individual Goletz employees to accept favours and gifts from business partners. However, in order to avoid undesirable conflicts of interest, Suppliers must not offer favours, gifts, services or inappropriate hospitality to Goletz employees, either to the employee themselves or to persons or entities in their immediate vicinity. An exception has been made for occasional gifts of limited value. Offering a gift in the form of a monetary payment is not permitted under any circumstances.

### **Anti-money laundering**

The Supplier shall conduct its business in accordance with all applicable anti-money laundering regulations.

## **Privacy and Intellectual Property**

The Supplier will safeguard and make only appropriate use of confidential information and ensures that all employees' and Supplier's privacy and valid intellectual property rights are protected. The Supplier must ensure that all personal data of employees, contractors and/ or other third parties is processed in compliance with all applicable laws, including the General Data Protection Regulation (EU 2016/679).

## **II. HUMAN RIGHTS AND LABOUR PRINCIPLES**

### **General**

Goletz expects its Suppliers to respect internationally recognised human rights and labour conditions. The Supplier must support and respect the human rights principles of the UN Global Compact (Principles 1 and 2) and the labour principles of the UN Global Compact (Principles 3, 4, 5 and 6).

### **Non-discrimination and fair treatment**

Goletz stands for equal treatment of its employees and does not discriminate in any way. Suppliers shall not discriminate in recruitment and employment practices such as applications for hiring, promotions, rewards, access to training, benefits, terminations or retirement. Illegitimate grounds for discrimination include, but are not limited to: race, colour, gender, age, language, property, nationality or origin, religion, ethnic or social origin, disability, pregnancy, trade union membership, political opinion or sexual orientation. The Supplier shall ensure that its employees are not threatened or harassed in any way. It is strictly prohibited to violate the dignity of any person verbally or physically.

### **No forced labour**

Goletz does not tolerate slavery and forced or compulsory labour, (including bonded labour and voluntary prisoner labour) in our supply chain.

### **No child labour**

Goletz does not tolerate child labour in our supply chain. The Supplier must avoid any form of child labour in its business operations and shall comply with the minimum age for work permits in accordance with applicable regulations.

### **Minimum wages and working hours**

The Supplier shall comply with all applicable laws and regulations including, but not limited to, those relating to minimum wages, working hours and overtime.

Suppliers are expected to provide fair and competitive compensation and benefits to their employees.

### **Health & Safety**

The Supplier shall ensure a safe and healthy workplace or any other place where work is performed in compliance with all applicable laws and regulations and shall, at a minimum, ensure adequate access to potable water and sanitation, fire protection, and adequate lighting and ventilation. The Supplier shall implement appropriate controls, safe procedures and protocols for the provision of suitable protective equipment in accordance with all applicable laws and regulations. The Supplier shall take all appropriate measures to protect its employees from any health hazards and ensure that employees who work in a facility are carefully selected and properly trained.

### **Freedom of Association**

The Supplier recognises and respects the right of employees to freely associate, organise and bargain collectively, to form or join trade unions and representative organisations if they wish to do so.

## **III. ENVIRONMENT**

### **Environmental Policy**

Goletz works to continuously assess and reduce our environmental impact. Our goal is to prevent environmental damage and minimise our use of energy and resources. Suppliers must comply with all environmental laws and regulations that apply to the workplace, manufactured products and production methods. In addition, suppliers must not use materials that are considered harmful to the environment, but should encourage the use of processes and materials that support environmental sustainability throughout their supply chain. We expect our Suppliers to avoid pollution and prevent wasteful use of natural resources. We expect our suppliers to avoid pollution and prevent wasteful use of natural resources. This applies in relation to water quality and consumption, air quality, responsible chemical management and other areas. The Supplier must respect and support the environmental principles of the UN Global Compact (Principles 7, 8 and 9). Suppliers are expected to establish and maintain an appropriate environmental management system (e.g. in accordance with ISO 14001 or national equivalent).

### **Conflict minerals**

The Supplier shall comply with all applicable conflict minerals laws and regulations. In addition, the Supplier shall establish a policy to reasonably ensure that conflict materials (including tin, tungsten, tantalum and gold) which may be contained in

the products they manufacture do not directly or indirectly finance or benefit armed groups that violate serious human rights.

#### IV. MISCELLANEOUS

##### **Audit and non-compliance with this code of conduct**

Upon request, the Supplier shall provide Goletz with all necessary and/ or requested documentation demonstrating compliance with this Code. The Supplier shall address any violations of this Code or equivalent standards of which it becomes aware and take appropriate action. Goletz reserves all rights to ensure the Supplier's compliance with this Code through monitoring, independent third-party verification and audits. Goletz shall be entitled to terminate individual orders and/ or the contractual relationship with the Supplier in case the Supplier and/ or any third party involved by the Supplier breaches any of the provisions of this Code and fails to effectively remedy such breach within a reasonable period of time set by Goletz.

##### **Complaints procedures and contact person**

The supplier is responsible for establishing an effective grievance mechanism at the facility level for individuals and communities that may be affected by negative impacts.

The following person is responsible for receiving information on possible violations of the Code of Conduct and is the contact person for all questions relating to the basic rules of this Code of Conduct:

The Chief Compliance Officer: Ms Miriam Mürmann.

Notifications can be addressed to the Compliance Officer by e-mail, by telephone or in writing (also anonymously) in a sealed envelope (please mark "COMPLIANCE" on the envelope).

E-mail: **compliance@goletz-gmbh.de**

Telephone number: +49 2359 914063

Address: Goletz GmbH  
Attn.: Ms Miriam Mürmann  
Am Funkenhof 2  
58566 Kierspe