#### **BUEHNEN Code of Conduct**

The BUEHNEN Code of Conduct is based on the UN Conventions, the UN Conventions on the Rights of the Child and on the Elimination of All Forms of Discrimination against Women, the UN Global Compact, the OECD Guidelines for Multinational Enterprises and other internationally recognized agreements.

With this Code of Conduct, BUEHNEN undertakes, within its sphere of influence, to recognize the social and environmental standards laid down in this Code of Conduct and to take the appropriate measures to implement and comply with it within the framework of its corporate policy. Supplier companies must ensure that the Code of Conduct is also observed by them and subcontractors who are involved in production processes during the final processing stages and who are commissioned by BUEHNEN. BUEHNEN will comply with the following criteria in its decisions and actions:

#### 1. compliance with laws

All applicable laws and regulations, UN industrial minimum standards and standards and all other relevant legal provisions shall be complied with, applying those regulations which impose the most stringent requirements.

### 2. freedom of assembly and the right to collective bargaining

All workers have the right to form, join and organize trade unions of their choice and to negotiate collectively on their behalf with the company. BUEHNEN respects this right and effectively informs workers of their right to join an organization of their choice and that this will have no negative consequences for them or retaliation by the company. The company will not interfere in any way in the establishment, functioning and administration of such workers' organizations or in collective bargaining. In situations or countries where the right to freedom of assembly and collective bargaining is restricted by law, BUEHNEN allows employees to freely elect their own representatives. The company shall ensure that employee representatives and other workers who organize employees are not subject to discrimination, harassment, intimidation or retaliation for their union membership or participation in union activities and that employee representatives have access to their members' workplaces.

#### 3. prohibition of discrimination

Any discrimination in recruitment, remuneration, access to training, promotion, termination of employment or retirement based on sex, age, religion, race, caste, birth, social background, disability, ethnic or national origin, nationality, membership of workers' organizations including trade unions, political membership or affiliation, sexual orientation, family responsibilities, marital status or any other condition is prohibited.

#### 4. wages

Wages for regular working hours, overtime and overtime compensation must meet or exceed statutory minimum wages or industry standards. No illegal or illicit deductions from wages or salaries may be made as a punitive measure. In cases where statutory minimum wages or industrial minimum standards do not cover the cost of living and do not leave any additional disposable income, companies are encouraged to pay their employees adequate compensation to meet these basic needs. Wage deductions as a punitive measure are prohibited unless permitted by national law and a freely negotiated collective agreement is in force. BUEHNEN ensures that employees receive clear, detailed and regular information on the composition of their pay. It also ensures that wages are paid in accordance with all applicable laws and that remuneration is paid in a manner appropriate to the employees.

Overtime is paid at a supplement defined by national law. In countries where overtime pay is not regulated by law or collective bargaining agreements, employees are paid a bonus to compensate for overtime or are compensated in accordance with applicable industry standards, whichever is more favorable to employees.

## 5. working time

BUEHNEN complies with applicable national laws and industry standards on working hours and public holidays. The maximum permitted weekly working hours according to national legislation apply, but 48 hours must not be regularly exceeded. No more than 12 overtime hours may be worked per week. Overtime may only be worked on a voluntary basis and is subject to a surcharge. In cases where overtime is necessary to meet a short-term need of BERLIN and where BERLIN has signed a freely negotiated collective agreement with employee organizations (as defined above) representing a significant part of its workforce, BERLIN may demand overtime in accordance with this agreement. Such an agreement must comply with the above requirements.

Each employee has the right to at least one day off after six consecutive working days. Exceptions to this rule only apply if both of the following conditions are met:

- (a) working time may exceed that limit in accordance with national law; and
- (b) a freely negotiated collective agreement is in force permitting an average calculation of working time, including appropriate rest periods.

#### 6. health and safety at work

BUEHNEN shall ensure a safe and healthy working environment and shall take effective measures to prevent potential accidents and harm to the health of workers associated with or occurring in the course of work by reducing, as far as is reasonably practicable, the hazards associated with the working environment, taking into account the current state of knowledge of the industry and

knowledge of specific hazards. Clear rules and procedures shall be established and followed to ensure health and safety at work, in particular with regard to the provision and use of personal protective equipment, access to clean toilets and drinking water and, where appropriate, hygienic food storage facilities. All workers shall have the right to emerge from immediate, serious danger without having to ask for permission.

Practices and conditions in the workplace as well as conditions in dormitories that violate fundamental human rights are prohibited. In particular, young workers must not be exposed to dangerous, unsafe or unhealthy situations.

In particular, a safety officer must be appointed who is responsible for the health and safety of all employees and for implementing the health and safety regulations at BUEHNEN. All employees regularly receive health and safety training to be documented. New employees receive this training at the beginning of their work, for reemployee employees the training is repeated.

Systems shall be put in place to identify and prevent or respond to potential risks to the health and safety of workers.

#### 7. prohibition of child labor

Child labor is prohibited under the provisions of the United Nations and/or national legislation. Of these different standards, the one that has the most stringent requirements must be applied. Any form of exploitation of children is prohibited. Working conditions similar to those of slavery or harmful to the health of children are prohibited. The rights of young workers shall be protected.

BUEHNEN may employ young workers. However, in cases where binding school laws apply to young workers, they may only work outside school hours. Under no circumstances may the school time, working time and travelling time of a young worker exceed a total of eight hours per day. Young workers may not work during the night.

#### 8. prohibition of forced and compulsory labor and disciplinary measures

Any form of forced labor, for example obtained by depositing a deposit or withholding identity papers of employees at the beginning of the employment relationship, is prohibited. Prison labor that violates fundamental human rights is also prohibited.

Neither BUSINESS nor any entity providing BUSINESS labor may withhold any portion of an employee's salary, benefits, property or documents to force him to continue working for BUSINESS.

Employees have the right to leave their workplace at the end of a normal working day. They have the right to terminate their employment with the employer at their own discretion, subject to reasonable notice.

BUEHNEN shall treat its employees with dignity and respect. The use of physical punishment, psychological or physical coercion and verbal abuse is prohibited.

# 9. environmental and safety issues

Procedures and standards for waste management, handling and disposal of chemicals and other hazardous substances as well as for emissions and waste water treatment must meet or exceed the minimum legal requirements.

## 10. management systems

BUHNEN hereby defines and implements a policy of social responsibility. The management system ensures that the requirements of the BUEHNEN Code of Conduct can be fulfilled. The management is responsible for the correct implementation and continuous improvement of the implementation of the Code of Conduct. It takes corrective action, regularly reviews compliance with the Code of Conduct and is also responsible for ensuring that all employees are aware of the requirements of the Code of Conduct. It also deals with employee complaints regarding non-compliance with the Code of Conduct.

Bremen, May 2019

#### Statement

Declaration of commitment to comply with the requirements of the BUEHNEN Code of Conduct

The undersigned hereby declare,

BUEHNEN.

- that we have received the BUEHNEN Code of Conduct as of May 2019 and have taken sufficient note of it,
- that we are familiar with all relevant laws and regulations of the country or countries in which our company operates,
- that we will inform BUEHNEN if the BUEHNEN Code of Conduct conflicts with the applicable laws or regulations of the country or countries in which we operate,
- that we observe and adhere to the BUEHNEN Code of Conduct on the basis of a developmentoriented corporate policy in its entirety and without changing or repealing individual provisions;
  and
- that we inform all our subcontractors of the requirements of the BUEHNEN Code of Conduct and ensure that they also comply with the provisions contained therein.

Date Company nam	ne
Signature	_ Company stamp/seal
Name	_ Address
Customer code number of the co	mpany/code number

This document must be signed by a duly authorized representative of the company and returned to