

Code of Conduct

Business partners' statement

Preamble

The guideline for conduct and ethics apply to both the management and employees of the business partner of **Chr. HELD GmbH & Co. KG** and serve as a prerequisite for the business relationship.

The ethical guidelines described in these Code of Conduct are based primarily on the principles of the United Nations Global Compact, the ILO conventions, the United Nations Universal Declaration on Human Rights, the United Nations Convention on the Rights of the Child and the Convention on the Elimination of All Forms of Discrimination against Women as well as the OECD Guidelines for Multinational Enterprises.

The following Code of Conduct sets out only the minimum standards. These minimum requirements should be exceeded wherever possible.

All business partners of HELD must ensure compliance with the Code of Conduct within their own organisations and by all subcontractors involved in production processes for Held products.

General principles, rights and legislation

The undersigned organization undertakes to comply, in all its business activities and decisions, with the applicable laws and other relevant provisions (e.g. minimum social standards) in those countries in which it operates.



Principles of social compliance

1. Child labour

Child labour is not tolerated by any business partner of HELD. The undersigned organisation adheres to the United Nations regulations on human and children's rights, and in particular complies with the agreement on the minimum age at which employment is permitted (ILO Convention N. 138) and the agreement on the prohibition and the implementation of immediate measures to eliminate the worst forms of child labour (ILO Convention N. 182).

2. Forced labour

Business partners of HELD do not accept any form of forced labour, bonded labour or slave labour. All employments must be on a voluntary basis and be based on forms of employment which comply with national laws and practices. Employees must not be required to deposit their identification papers or have them withheld.

Direct or indirect measures to prevent employees from leaving the organisation or the manufacturing site are prohibited.

3. Discrimination

Business partners of HELD undertakes, within the context of the applicable rights and laws, to counter all forms of discrimination. This refers in particular to discrimination against employees on the basis of gender, race, disability, ethnic or cultural background, religion or beliefs, age or sexual orientation.

4. Disciplinary measures

All employees have the right to be treated with respect and dignity. All forms of physical, psychological, sexual or verbal penalization and coercion as well as all forms of abuse and intimidation are prohibited. Disciplinary measures may be applied only in accordance with national laws and internationally recognized human rights.

5. Fair terms of employment

Business partners of HELD adheres to its employees' right to freedom of association, and in particular the right to form organisations of their own choice, to join such organisations and to enter into collective bargaining. In situations where rights to freedom of association and collective bargaining are restricted, employees must be granted other opportunities for independent and free association and collective bargaining.



6. Working hours

Business partners of HELD will adhere to working hours which are in accordance with the applicable laws and industrial standards. Weekly working hours must not regularly exceed 48 hours, and must not exceed 60 hours including overtime. Overtime must be worked only on a voluntary basis. Employees are entitled to one free day after every six consecutive days of work.

7. Wages

Business partners of HELD will guarantee that the wage paid for a normal working week will in all cases equate to the minimum standard stipulated by law or by sector provisions. Employees must receive all the benefits stipulated under national legislation (e.g. insurance contributions, additional pay, etc.). Employees must be guaranteed to receive a comprehensible indication of their salary and additional payments at regular intervals and in an understandable form.

Salaries must be paid in accordance with normal local practices. Unauthorised deductions from salary and deductions applied as disciplinary measure are not permitted.

8. Working environment, health and safety

Business partners of HELD must provide employees with a safe and hygienic working environment and, where appropriate, living conditions. Health and safety in the workplace provisions and processes must be introduced and communicated to employees in order to prevent accidents and injury while at work or as a consequence of using business facilities. All applicable national working conditions stipulations must be adhered to.

9. Information provided to employees

This Code of Conduct must be freely accessible to all employees and be available in hard copy and understandable in the relevant national language.

10. Bribery and corruption

Business partners of HELD do not tolerate any form of corruption or bribery, either by direct or indirect means, in the form of money, gifts or other unfair benefits. The organisation and its employees must refrain from all conduct, which would result in personal dependencies or manipulation. Employees are not permitted to abuse their position in order to guarantee unfair advantage of a personal or commercial nature.

They must not bestow inappropriate gifts upon business partners, and must cease making such gifts to officials and other government employees. Employees accept only low-value where there is no question of the recipient (potentially) being manipulated.



11. Inspections

The organisation shall make one or more of its management employees responsible for monitoring compliance with said standards at its operational and production sites. This includes the sites of subcontractors acting as suppliers to HELD.

These checks must be conducted on an annual basis at minimum, and compliance with the standards set out in the Code of Conduct must be documented at least once per annum on the enclosed sheet (Compliance Certificate) which is then issued to the designated employees.

HELD retains the right to carry out, or to instruct authorized third parties to carry out, checks on business partners or their subcontractors without prior notice. This includes checking equipment, offices and records, which serve as evidence of compliance with the standards. If authorized inspectors are prevented from performing such checks or denied the opportunity to pose questions, this equates to a clear contravention.

The business partners of HELD undertakes to take action where an inspection establishes a contravention of the standards stipulated in the Code of Conduct. The business partners and their subcontractors are obliged to correct all deviations detected during inspections and to work continuously towards improving social standards. Time, support and advice are available in terms of implementing remedial measures.

Place, date	Business partner (Company)
	Name
	Position