

CODE OF CONDUCT

NO FORCED LABOR, BONDED LABOR OR HUMAN TRAFFICKING

Every employment is exclusively voluntary. Our business partners must not use, or through business partners, be complicit to, any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labor, including state-imposed forced labor. Employees' personal freedom of movement must not be restricted. Employers may not require employees to deposit money or means of identification (e.g., ID) with the employer. In accordance with international principles on responsible recruitment, employees must not be charged any recruitment fees or costs. Employees are free to leave their employer upon reasonable notice in accordance with applicable law at all times and may return safely to work after giving notice. The production of goods by prison labor is strictly prohibited. In addition, only migrant workers with a valid work permit can be employed.

ILO Conventions 29 and 105 as well as Recommendation 203 on measures for the effective elimination of forced labor apply.

NO CHILD LABOR AND RESTRICTION OF YOUTH EMPLOYMENT

Seidensticker Group does not tolerate any form of child labor or the exploitation of children and adolescents. The minimum age for employment may not be below the age at which compulsory education ends, and under no circumstances below the age of 15. Domestic standards of child protection and employment of juveniles are to be adhered to. The exceptions defined by the ILO apply. Compliance with the ban on child labor and the restriction of the employment of adolescents are to be always guaranteed and under any circumstances. Reliable and vigorous mechanisms for age determination must be established, which may not be in any way degrading, humiliating or disrespectful towards employees.

In the event of a violation of this prohibition, the business partner must immediately take suitable remedial actions for the people affected. The remedial measures must be documented. In addition, measures and procedures must be taken that serve the rehabilitation and social integration of the children concerned and enable them to obtain a general school-leaving qualification in accordance with national standards and norms.

ILO Conventions 131, 138 and 182 and ILO Recommendations 14 and 190 apply.

SPECIAL PROTECTION FOR YOUNG WORKERS

Business partners must ensure that young people do not work at night and are protected from working conditions that are detrimental to their health, safety, morals, and development. Young workers must be immediately removed from hazardous work or sources of danger if such are identified. Their scope of work must be redefined without any loss of income.

It must be ensured that a) the kind of the work is not likely to impair the health or development of young workers; and b) the working hours allow for school attendance, participation in vocational guidance approved by the concerned authority or participation in training and education programs.

Necessary mechanisms shall be put in place to prevent, detect and mitigate harm to young workers, with particular attention to the provision and access of young workers to effective workplace grievance mechanisms, occupational safety and health training and programs specifically tailored to the needs of young workers.

ILO Conventions 10 and 77 and ILO Recommendations 14 and 146 apply.

NO DISCRIMINATION, SEXUAL OR GENDER-BASED HARASSMENT OR VIOLENCE IN THE WORKPLACE

It must be ensured that all employees are treated equally, with dignity and respect and are offered equal opportunities. Effective measures shall be taken to ensure that workers are not subject to any form of violence, harassment, inhuman or degrading treatment in the workplace, threats of violence and abuse, including corporal punishment, verbal, physical, sexual, economic or psychological abuse, mental or physical coercion, or other forms of harassment or intimidation.

Any form of discrimination on the grounds of gender, age, religion, descent, caste, birth, social background, ethnic and national origin, nationality, membership in employee organizations including trade unions or other legitimate organizations, political affiliation or opinion, sexual orientation, family duties, marital status, pregnancy, disease, disability, or other conditions that may lead to discrimination is not permitted. This applies to recruitment, remuneration, access to training, promotions, dismissals, and retirement. Disciplinary measures must be established, documented in writing, and explained to workers in terms and language they understand.

ILO Conventions 100, 111, 156, 159 and 190 and ILO Recommendations 165 and 206 apply.

DISCIPLINARY MEASURES

All employees shall be treated with respect and dignity. Any disciplinary measures must be carried out only in accordance with national laws and internationally recognized human rights. Employee may not be subject to verbal, psychological, physical and/or sexual violence, nor to coercion or harassment. Employees who file a complaint based on this Code of Conduct and/or applicable national or international law, shall not be subject to any form of disciplinary or retaliatory measures.

NO PRECARIOUS EMPLOYMENT

The recruitment process and employment relationships shall not cause insecurity and social or economic vulnerability for their workers. It must be ensured that work is performed based on a recognized and documented employment relationship, established in compliance with relevant national legislations, custom or practice, and international labor standards, whichever provides greater protection.

Business partners shall provide their employees with written, clear, and transparent employment contracts. The minimum content of an employment contract are as follows:

Name, address, date of birth, function in the company, date of commencement of employment, working hours, salary and remuneration, probation period (if applicable), right to paid leave, details of notice of employment termination (by employee or employer), signatures of both parties to the contract, employee and employer and the date.

Before entering employment, workers must be provided with understandable information in their own language and it must be ensured that they are aware of their rights, responsibilities, and employment conditions, including working hours, remuneration and terms of payment in their own language.

Our business partners are committed to providing decent and, where appropriate, flexible working hours that also support workers – regardless of gender – in their role as parents or caregivers, including migrant and seasonal workers whose children may be in their hometowns. Employment relationships must not be exploited in a way that is intentionally inconsistent with the purpose of the law. This includes a) apprenticeship or training programs where there is no intention to impart skills or provide regular employment, b) seasonal or contingent employment when it is applied to undermine workers' protection.

ILO Conventions 24, 25, 95, 117, 158, 175, 177 and 181 apply.

FAIR REMUNERATION

The minimum remuneration paid for the standard working time must be based on the legal, industry-specific minimum standards or applicable collective agreements, whichever involves the greater amount. The payment of wages shall take place in a regular, timely and stable manner, and in full legal tender. It must be ensured that workers of all genders and categories, such as migrant and local workers, receive the same remuneration for equal jobs and qualification.

Business partners should particularly aim to pay such wages that cover the basic needs of employees and their families, leaving a sufficiently large part of their income to be disposed of as they wish and enable an adequate standard of living, particularly when the domestic statutory minimum wages are not enough for this purpose. Business partners shall accurately identify the wage gap and commit to working toward paying a living wage.

At a minimum, employees shall receive all legally mandated benefits. Any overtime work must be paid in line with statutory, industry-specific standards or collectively agreed norms currently

in force, whichever involves the larger amount. Employees must be given complete and comprehensible information, in writing, on the structuring and detail of their wage rates, including deductions, overtime bonuses and additional benefits. Deduction from wages may not be used as disciplinary measure.

ILO Conventions 95, 100 and 131 and Recommendations 85, 135 and 180 apply.

DECENT WORKING HOURS

Working hours must comply with applicable law and industry-specific standards, whichever are more stringent. Employees are not required to regularly work more than 48 hours per week under any circumstances. Working hour practices that enable a healthy work-life balance for the workers should be promoted. Overtime shall be an exceptional and voluntary practice, paid at a premium rate of minimum 125% of the standard rate and may not increase the likelihood of occupational hazards. Overtime shall not exceed 12 hours per week and shall not be required on a regular basis.

Exemptions from these prohibitions are only permitted if the following conditions are met:

- a) national law expressly allows for working hours exceeding these upper limits; and
- b) a freely negotiated collective labor agreement is in force permitting the averaging of working hours, including appropriate rest periods.

Workers have the right to resting breaks in every working day and the right to take at least one day off in every seven days, unless exceptions, defined by collective agreements, apply.

ILO Conventions 1, 14, 101, 110, 132 und 171 and Recommendations 116 and 110 apply.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The right of any employee (without any distinction and regardless of gender) to found associations or organizations for the purpose of promoting and protecting employees' interests, to join or resign from such organizations and to conduct collective bargaining in a free and democratic manner, shall be respected at all times.

Employers are encouraged to develop a positive approach towards the right to freedom of associations and collective bargaining by actively notifying their employees of such rights, and to exert an open and positive attitude towards trade unions and their organizational activities.

Where the right to freedom of association and collective bargaining is restricted by law, alternative possibilities of independent and free organizations and the conduct of negotiations should be created. Business partners must ensure a meaningful representation of all workers. Workers must be allowed to freely elect their own representatives with whom the company can enter dialogue about workplace issues. Employees shall be protected against discrimination,

harassment, intimidation, or reprisal. They must be given free access to their fellow employees, to ensure that they are able to exercise their rights in a legally compliant and peaceful manner.

ILO Conventions 11, 87, 98, 135 and 154 and Recommendations 91, 92, 143 and 158 apply.

HEALTH & SAFETY AT WORK (OHS)

The right to healthy working and living conditions of workers and local communities must be respected. Vulnerable persons, in particular young workers, young, expectant, and nursing mothers, homeworkers, and persons with disabilities, shall obtain special protection. National legislation for the protection of health and safety in the workplace must be complied with. If national legislation is weak or insufficiently enforced, international standards apply.

Employees must be provided with a safe and hygienic working environment. Occupational safety procedures must be in place to identify, prevent and mitigate potential and actual threats to health and safety in the workplace. Employees shall be informed of potential risks to health and safety in the workplace. Effective measures shall be taken to prevent accidents, injuries, and illnesses at work or through the operation of the employer's equipment. The measures aim at minimizing the causes of potential threats as far as possible. These exercises and procedures for improving or strengthening occupational safety must be communicated to employees from all work areas and regularly trained with them. In particular, the free provision and use of personal protective equipment, access to clean sanitary facilities, eating and rest areas as well as clean and safe drinking water must be ensured. Sanitary facilities should have an adequate number of separate toilets with sufficient privacy for all genders. In addition, adequate occupational medical assistance and related facilities must be provided. Employees must be given equal access to these services. The measures also include better protection for employees, e.g. through health insurance. All health services and provided insurances should meet the specific concerns and needs of all genders and age groups. All health and safety incidents in the workplace and in all facilities provided or required by the employer must be documented.

The business partner shall take appropriate actions to obtain all permits, licenses and documentation required by national legislation to ensure the stability and safety of the facilities, buildings and equipment they use and to protect against and prepare for all foreseeable emergencies. Furthermore, the employer must provide awareness to workers, and respect their right and responsibility to exit the premises and/or stop working without seeking permission or being punished for it in dangerous situations and uncontrolled hazards.

Our business partners shall establish relevant committees that are entrusted with responsibility for health and safety in the workplace to ensure active cooperation between management and employees. These committees are involved in the assessment of potential and actual health risks and hazards and in the implementation of procedures to prevent them. The guidelines apply equally to all social facilities and employee accommodation (e.g., dormitories) if these are provided by the employer.

ILO Conventions 148, 155, 183, 184 and 187 and ILO Recommendation 164 apply.