



# Supplier Code of Conduct

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and implementation of the Code of Conduct for Suppliers

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## 1

# Preamble

The Kleinewefers-Jagenberg Group<sup>1</sup> is a medium-sized group of companies focused on providing high-quality solutions in the web-converting industry. The Kleinewefers-Jagenberg Group is committed to ecologically and socially responsible corporate management. We strive to continuously optimize our entrepreneurial actions, our products, and our services in terms of sustainability and ask our suppliers to contribute holistically.

Our goal is to make an active contribution to reducing CO<sub>2</sub> emissions and to establish responsible use of resources along the entire value chain.

This Supplier Code of Conduct is based on the sustainability standards defined by the United Nations Global Compact, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the ILO Basic Conditions of Employment, and the United Nations Guiding Principles on Business and Human Rights. It summarizes what we stand for and sets out our expectations of our supply chain partners. Accordingly, the Kleinewefers-Jagenberg Group requires each supplier to comply with the following principles. This agreement shall form the basis for all future deliveries. Suppliers are encouraged to build their supplier relationships.

## 2

# Scope

Kleinewefers-Jagenberg Group Supplier Code of Conduct applies to all suppliers, contractors and subcontractors of goods and/or services to any company of the Kleinewefers-Jagenberg Group (hereinafter collectively referred to as **“Suppliers”**).

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## Roles and Responsibilities

We expect our Suppliers to ensure that their activities are fully compliant with the applicable laws and regulations, and that they also align their behavior with the above-mentioned internationally recognized sustainability standards.

As a matter of principle, we strive to enter into sustainable partnerships with our suppliers. As a basis for this, this Supplier Code of Conduct sets out specific conditions for assessing the social, environmental, and ethical performance of our Suppliers and their respective value chains. The companies of the Kleinewefers-Jagenberg Group may request their Suppliers to conduct a self-assessment at any time. Furthermore, the companies of the Kleinewefers-Jagenberg Group reserve the right to conduct audits on a case-by-case basis at the Suppliers and their

value chain regarding compliance with the Supplier Code of Conduct and an agreed plan for the implementation of measures to prevent and eliminate violations of the Code of Conduct. Such audits are conducted together with representatives of the supplier in accordance with applicable laws.

Suppliers shall be responsible for ensuring compliance in their own value chain. In the event of non-compliance, including withholding of audit rights or non-compliance with an agreed obligation, the companies of the Kleinewefers-Jagenberg Group reserve the right to immediately terminate business relations with the Suppliers concerned, including all associated supply contracts.

# 4

## Labour and Human Rights

### 4.1 Prohibition of Forced Labour

Supplier shall not support, use or allow any form of forced labour, compulsory labour, human trafficking, modern slavery or involuntary labour.

Any employment with the Supplier shall be on a voluntary basis and employees shall be entitled to terminate work or employment at any time. The Supplier shall only hire

employees who are legally entitled to work in the country of employment. The Supplier shall not unreasonably restrict the workers' freedom of movement within the workplace or when entering or leaving the facilities provided by the company. The Supplier shall ensure that neither psychological hardship nor sexual or personal harassment is exercised towards its employees.

### 4.2 Prohibition of Child Labour

The Supplier shall not support, use or tolerate child labour in any phase of production. The Supplier shall be obliged to adhere to the recommendation from the ILO conventions on child labour, in particular on the minimum age for the employment of children. Accordingly, the age of a worker shall not be less than the age at which compulsory education ends and in any case not

less than 15 years. The Supplier shall prohibit employees, unless they are at least 18 years of age, from engaging in activities that are hazardous to health and safety, such as night work, overtime, heavy lifting, and working with toxic or hazardous substances. If the applicable law stipulates stricter standards, those shall apply.

### 4.3 Fair Remuneration

Remuneration paid to employees shall comply with all applicable laws on remuneration, which include, for example, laws on minimum wage or overtime. Deductions from wages as a punitive

measure shall not be permitted. The basis on which workers are remunerated shall be disclosed to workers on an ongoing basis through a payroll invoice.

#### 4.4 Fair Working Hours

The Supplier shall ensure that the regular weekly working hours comply with the applicable laws as well as the provisions of ILO Convention

Number 1 on Working Hours. After six consecutive working days, workers shall be granted at least one day off.

#### 4.5 Freedom of Association and the Right to Collective Bargaining

The Supplier shall respect the right of employees to freedom of association, to join labour unions, to appeal to a labour representation or

to join works councils in accordance with local laws.

#### 4.6 Prohibition of Discrimination

Discrimination against employees in any form shall not be permitted. This shall apply, for example, to discrimination based on skin color, age, gender, sexual orientation, gender identity and expression, ethnicity or national

origin, disability, pregnancy, religion, political affiliation, or union membership. The personal dignity, privacy and personal rights of each person shall be respected at all times.

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## Health Protection and Safety at Work

The Supplier shall be responsible for a safe and healthy working environment. The Supplier shall take the necessary precautionary measures in accordance with the applicable regulations against accidents and damage to health that may arise in connection with the activities of the employees. In addition, workers shall be regularly informed and trained on

applicable health and safety standards and measures. Employees shall be provided with access to drinking water in sufficient quantities and to clean sanitary facilities. Company facilities for the accommodation of employees shall guarantee the dignity, hygiene and safety of the individual.



## 6

## Environmental Protection

The companies of the Kleinewefers-Jagenberg Group have set themselves the goal of making an active contribution to reducing CO<sub>2</sub> emissions and establish a responsible use of resources along the entire value chain. In order to quantify our achievements, we make advance use of representative, industry-specific information, prospectively enriched by supplier-specific information. In terms of our supplier development, we accompany the supplier, if necessary, in the development and implementation of the required conditions. Our Suppliers therefore play a crucial role in realizing our

ambitions with regard to the environment and the circular economy.

We recommend that our Suppliers develop an effective environmental strategy and use an environmental management system in accordance with ISO 14001 or EMAS, which promotes environmental responsibility and enables continuous improvement of their environmental performance and impact.

To demonstrate and further develop relevant topics and key figures, we recommend that our Suppliers join corresponding initiatives or have suitable ratings (e.g., CDP - formally the Carbon Disclosure Project).

### 6.1 Resource Efficiency

The Supplier shall review, take and control measures to reduce its consumption of energy, water, raw materials and packaging materials.

In addition, each Supplier is encouraged to reduce dependence on fossil fuels.

### 6.2 Emissions and Handling of Waste and Hazardous Substances

The Supplier shall examine, take and control measures to reduce emissions to air, water and waste of all kinds. The Supplier shall ensure applicable regulations in the handling, storage, transport, disposal, recycling and reuse of waste, exhaust gases and wastewater. Activities that may have adverse effects on human

health or on the environment shall be avoided or minimized, and in all cases shall be adequately managed, measured, and controlled.

### 6.3 Life Cycle and Circular Economy

We appeal to the Supplier to share information with us about its carbon footprint and its calculation method. Independently of this, the Supplier shall monitor and document its energy consumption. The Kleinewefers-Jagenberg Group reserves the right to request and verify proof of Supplier's energy consumption.

Furthermore, we encourage our Suppliers to support us in the evaluation of the products and services supplied by the Supplier and, in particular, to make available all data for the ecological evaluation and the designated life cycle scenarios. The collection, calculation, evaluation and communication of the relevant CO<sub>2</sub> data shall be carried out in accordance with applicable norms and standards of the Greenhouse Gas Protocol (GHG Protocol).

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## Ethics

### 7.1 Fair Competition

The Supplier shall comply with the laws and regulations prohibiting agreements, arrangements and concerted practices between competitors, suppliers, customers and dealers. The same applies to laws against improper exploitation

of market power by one-sided behaviour. The Supplier shall not engage in conduct that violates competition and antitrust laws and shall also ensure this expectation in the supply chain.

### 7.2 Data Privacy

The Supplier shall comply with data protection and information security laws and government regulations when collecting, storing, processing,

transmitting and disclosing personal information.

### 7.3 Intellectual Property

Intellectual property rights shall be respected. The transfer of technology and know-how shall be carried out in such a way that intellectual

property rights and rights in customer information are protected.

### 7.4 Responsible Sourcing of Minerals

The Supplier shall take appropriate measures to avoid the use of raw materials in its products which, according to the relevant EU regulation, originate from conflict and risk areas and contribute to human rights violations, corruption,

the financing of armed groups or similar negative effects. So-called conflict minerals are currently defined as tantalum, tin, tungsten, and gold.

### 7.5 Complaints Procedure

The Supplier shall be responsible for establishing an effective complaints procedure at the facility level for individuals and communities

to report possible violations of the principles of this Supplier Code of Conduct.

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## Management System and Implementation of the Code of Conduct for Suppliers

The Supplier commits to act responsibly and to comply with the listed principles/requirements. Furthermore, Kleinewefers-Jagenberg Group companies encourage the Supplier to continuously improve management systems related to the areas described in this Supplier Code of Conduct. Successful implementation of the Supplier Code of Conduct requires risk assessment, implemented policies, processes and routines, clearly communicated roles and responsibilities, appropriate training and instruction, the setting and performance evaluation of measurable

objectives, and well-functioning control systems.

The Supplier shall report any relevant risks or violations of this Supplier Code of Conduct that come to its attention.

**Notice recipient:**

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## [Consent to the Code of Conduct for Suppliers]

As a Supplier to the Kleinewefers-Jagenberg Group, we act in accordance with the ethical and legal principles laid down in this Supplier Code of Conduct. We shall also pass on these requirements to our supply chain. We hereby acknowledge the Kleinewefers-Jagenberg

Group Supplier Code of Conduct and confirm that we comply with the above principles and requirements of the Kleinewefers-Jagenberg Group Supplier Code of Conduct by applying our own equivalent supplier code in our company.

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**Date/ Signature and stamp supplier or digital signature/recognition<sup>2</sup>**

<sup>2</sup>Only required if the Supplier Code of Conduct is signed separate. If, on the other hand, it is an annex to the supply contract, consent to the Supplier Code of Conduct shall be declared in the contract and the provision in Clause 9 may be deleted without replacement.



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