

Foreword

DRADURA is committed to maintaining a socially and ecologically responsible business operation. We see international human rights as a central element of our corporate philosophy and stand for integrity and responsibility. We expect the same from all our suppliers. We are also always striving to optimise the sustainability of way we act and our products. To achieve this we also require the responsible cooperation of our suppliers. Therefore, a common understanding of ethical and sustainable action forms the basis for our cooperation with our suppliers.

The social and environmental standards described in this Code of Conduct are based on the ten principles of the UN Global Compact, the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights as well as the OECD Guidelines for Multinational Enterprises.

The requirements and principles described are essential components of the contracts and the cooperation with our suppliers. The supplier therefore assures that they shall comply with and promote the following principles, and that they shall instruct and train their employees on the contents appropriately and in regular intervals.

Principle of legality

The supplier undertakes to comply with all applicable laws and regulations.

Social Responsibility

Human Rights

The supplier must respect, protect and actively promote internationally recognised human rights and shall ensure that these are not infringed anywhere along the supplier's supply chain. The UN Guiding Principles on Business and Human Rights shall form the basis in this regard.

Prohibition of Child Labour

The supplier must respect and protect the dignity and rights of children. The supplier undertakes to only hire such persons who have reached the minimum age required for performing the work according to the applicable national laws and to not tolerate any child labour. The ILO's Minimum Age Convention (No. 138) and Worst Forms of Child Labour Convention (No. 182) must be adhered to.

Prohibition of Forced Labour

The supplier undertakes to make no use of any manner of forced or compulsory labour or any form of slavery. Any work must be voluntary and be carried out without the threat of punishment (see ILO Convention No. 29) Therefore, any work associated with corporal, physical, sexual or verbal violence and/or abuse or economic exploitation, shall not be allowed (see the ILO's indicators for forced labour).

Use of Private or Public Security Forces

The engagement or use of security forces is to be dispensed with if lacking instructions of inadequate control by the supplier would create a risk of the use of torture, cruel, inhumane or demeaning treatment, injury to life and limb or a restriction of the freedom of assembly and association.

Occupational Health and Safety

The supplier must ensure a safe working environment conducive to good health in order to prevent and avoid accidents and injuries and, if relevant, to also ensure safe and health-promoting accommodations. The applicable local laws shall serve as the minimal standard in this regard. A management system for health and safety is to be established and applied according to ISO 45001 or a system suitable to the industry sector in question. Employees are to be trained and instructed accordingly.

Freedom of Association


The supplier shall respect the fundamental right of the employees to form unions and to join unions at their free discretion. Membership in a union or employee representation body may not be grounds for discrimination. The right to collective bargaining for the regulation of working conditions and the right to strike must be protected within the legal regulations and in line with the ILO Conventions Nos. 87 and 98.

Prohibition of Discrimination

The supplier undertakes to not tolerate any form of discrimination, e.g. due to skin colour, ethnic origin, gender, age, nationality, social background, disability, sexual orientation, religious affiliation, ideology, political convictions or union membership. Employees subject to the same requirements and performing the same tasks must receive equal remuneration for the same work, regardless of their gender (ILO Convention No. 100).

Remuneration and Working Time

The remuneration for regular working time and overtime must correspond at least to the

	Code of Conduct For Suppliers of the DRADURA Group	C2_P_0001_R01_EN
---	---	------------------

minimum wage according to applicable legislation.

Legal regulations regarding working time, breaks and leaves of absence must be complied with.

Protection Against Eviction and Dispossession of Land

It is prohibited to perform illegal evictions or illegal dispossession of land, forests or bodies of water the use of which forms the basis of life of a person.

Handling of Conflict Minerals

The supplier undertakes to comply with all applicable laws and regulations regarding conflict minerals. The supplier shall exercise great care regarding the source of their minerals.

Ecological Responsibility

Environmental Protection

The supplier is obliged to adhere to the environmental standards and provisions applicable to their business. Environmental pollution is to be reduced to a minimum, protection of the environment is to be continually improved, and resources are to be used economically. An environmental management system is to be established and applied according to ISO 14001 or a system suitable to the industry sector in question.

Preservation of the natural foundations of life

The supplier undertakes to protect the natural surroundings as best as possible. In particular, they undertake to refrain from harmful changes to the soil, pollution of bodies of water and the air, noise emissions and excessive water consumption. Especially in regions suffering from water scarcity, water withdrawal is to be kept to a minimum, and access to drinking water and sanitary facilities must be ensured. Standards regarding waste water quality are to be defined and monitored within the framework of the applicable legal and official requirements.

Climate Protection

The supplier commits themselves to active and sustainable climate protection, for example by the improvement of energy efficiency, the generation and/or procurement of energy from renewable sources as well as by further measures to reduce CO₂ emissions.

Prohibition of Harmful Substances

The supplier is obliged to comply with the legal prohibitions regarding ingredients, restrictions and declaration requirements as well as applicable standards on the prohibition and declaration of ingredients. In particular, the supplier shall comply with the prohibition of

manufacturing products with added mercury, the use of mercury and mercury compounds in the production process, and the treatment of mercury waste according to the Minamata Convention as well as the prohibition of the production and use of certain chemicals according to the Stockholm Convention on Persistent Organic Pollutants (POPs).

Environmentally Friendly Handling of Waste

The supplier must observe the prohibition of non-environmentally friendly handling, collection, storage and disposal of waste according to the regulations applicable according to point (d) of Article 6(1), item i, ii of the POPs Convention as well as the prohibition on the export of hazardous waste according to the Basel Convention.

Ethical Conduct of Business

Corruption and Bribery

The supplier shall ensure compliance with all applicable anti-corruption laws. No form of corruption or bribery, whether active or passive, will be tolerated.

Money Laundering

The supplier shall observe the applicable legal provision concerning money laundering prevention and shall comply with their reporting obligations.

Fair Competition

The supplier is obliged to uphold the principles of fair competition and to comply with any and all laws and regulations on competition on the market.


No tolerance shall be given especially to any abuse of a dominant market position as well as any collusion or concerted behaviour with other companies for the purpose of preventing, restricting or feigning competition or which seek to cause such effects, as defined in the applicable anti-trust regulations.

Customs and Export Regulations

The supplier shall comply with the international customs and export control regulations and must ensure proactive exchange of export information with the goal of achieving a secure and safe supply chain.

Data Protection and Data Security

The supplier is obliged to ensure in all business processes the right to informational self-determination, the safeguarding of personal data as well as the security of all business

	Code of Conduct For Suppliers of the DRADURA Group	C2_P_0001_R01_EN
---	---	------------------

information and personal data by complying with the legal requirements and the applicable data protection and information security legislation.

Supply Chain and Implementation

Supply Chain

To ensure the best possible compliance with the principles of this Code of Conduct throughout the entire supply chain, the supplier assures that they shall impose compliance with the principles of this Code of Conduct accordingly to the best of their ability on their own sub-suppliers and service providers which they use for fulfilling their performance obligations and have such sub-suppliers and service providers pass on these principles to their own sub-suppliers and service providers.

Monitoring and Infractions


DRADURA shall be entitled to verify compliance with the obligations stemming from this Code of Conduct in an appropriate manner. The supplier shall actively support DRADURA in such verification, in particular by answering any inquiries by DRADURA in a timely and adequate manner and allowing any on-site audits.

Corrective Action

Any infringements in the supplier's own business or in their supply chain, especially infringements of any human rights or environmental obligations, are to be stopped immediately. If this is not possible in the foreseeable future, the suppliers must create a concept for stopping or minimising the infringement and to implement it. This concept must include a concrete time plan and be submitted to DRADURA. In addition, the supplier must investigate any suspicion of infringement and to inform DRADURA of such investigation and its results.

Consequences of Infractions

Any infringement of the obligations described in this Code of Conduct shall constitute a breach of contract vis-à-vis DRADURA as well as an essential impairment to the business relationship between DRADURA and the supplier. The supplier shall be obliged to initiate corrective measures within an appropriate amount of time in order to prevent future infractions. The supplier is to inform DRADURA about such measures. If the supplier fails to comply with these obligations, or if the infraction is so severe that a continuation of the business relationship is no longer reasonable for DRADURA, DRADURA reserves the right to terminate the contractual relationship without notice or to rescind the contract in another manner, without this affecting any other right on the part of DRADURA.

 <p>DRADURA Group</p>	<p>Code of Conduct For Suppliers of the DRADURA Group</p>	<p>C2_P_0001_R01_EN</p>
---	--	-------------------------

Reporting Infractions

Every supplier, their employees or affected parties are invited to report infractions against this Code of Conduct to DRADURA. Reporting can be made to the “whistleblowing” box at: <https://dradura.whistleblowing-software.com>, which allows anonymous reporting. The supplier is required to inform their employees in an adequate manner of the possibility of such reporting.

DRADURA Supplier Code of Conduct can be found at our website under Corporate Responsibility