



MELCHERS

CODE OF CONDUCT

FOR BUSINESS PARTNERS

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INTRODUCTION

Since 1806, C. Melchers GmbH & Co. KG, including its affiliated companies within the meaning of Section 15 of the German Stock Corporation Act (AktG) (hereinafter “MELCHERS”), has stood for quality and trust in its relationships with business partners and employees. Close cooperation with our business partners is therefore important to us in order to provide our customers with high-quality products and services.

MELCHERS respects human rights, is committed to environmentally and socially responsible corporate governance, and seeks to base its relationships with business partners on responsibility, openness, loyalty, and determination.

For this reason, MELCHERS has developed this Code of Conduct for Business Partners, which defines standards to achieve these objectives and uphold these values. These standards are intended to ensure compliant and ethically sound conduct in day-to-day business and to establish a shared understanding between MELCHERS and its business partners.

Business partners are natural or legal persons from whom services or supplies are obtained or with whom other business relationships are entered into. This includes, in particular, suppliers, service providers, cooperation partners, target companies in transactions, and other providers of goods or services.

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EMPLOYMENT RELATIONSHIPS

HUMAN RIGHTS AND DISCRIMINATION

Our business partners undertake to comply with and promote internationally recognized human rights and fundamental freedoms.

MELCHERS does not tolerate any discrimination against individuals based on:

- Ethnicity
- Religion, ideology, or belief
- National origin
- Gender
- Sexual orientation
- Age
- Disability
- other grounds prohibited by law

Our business partners fully comply with laws prohibiting discrimination in the workplace and do not tolerate any discrimination – whether in hiring, termination, promotion, or training – based on the characteristics described above.

CHILD AND FORCED LABOR

MELCHERS rejects all forms of child and forced labor. Business partners must comply at all times with applicable labor laws and regulations. The requirements of the ILO (“International Labour Organization”) are authoritative in this regard.

Child Labor

ILO Convention 138 obliges member states to abolish child labor and set a legal minimum age for admission to employment and work. This minimum age is intended to safeguard the full physical and mental development of young people and should be at least 15 years. For work that endanger the development of young people, the Convention requires a minimum age of 18 years. Persons aged 13 to 15 may only undertake light work if it is not harmful to their health or development and does not affect their schooling or vocational training.

Child labor particularly refers to work that:

- is mentally, physically, socially, or morally dangerous and harmful to children; and/or
- interferes with their education by depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to combine school attendance with excessively long and heavy work.

Forced Labor

According to ILO Convention 29, forced labor is defined as any work or service demanded of a person under the threat of a penalty and for which that person has not offered themselves voluntarily.

MELCHERS’ business partners undertake not to practice or tolerate forced labor, slavery, or comparable forms of labor within their companies or supply chains. All work must be voluntary, and employees must be free to terminate their work or employment at any time.

WORKING TIME, WAGES, AND OTHER BENEFITS

MELCHERS' business partners must comply with the applicable working time regulations. Remuneration must be paid to employees regularly, on time, and in full and in accordance with applicable laws.

FREEDOM OF ASSOCIATION

MELCHERS' business partners must respect and uphold freedom of association and the right to collective bargaining, and must communicate openly and constructively with employees and their representatives. We expect that employees who serve as employee representatives will not be disadvantaged.

USE OF SECURITY STAFF

Private or public security staff may be used to protect business projects only if it is ensured that they comply with the prohibition of torture and cruel, inhuman, or degrading treatment, do not endanger life, and do not impede freedom of association through their deployment.

BUSINESS INTEGRITY

CORRUPTION

MELCHERS does not tolerate any form of corruption, whether in connection with business partners, authorized representatives, public officials, company representatives, or private individuals. This includes both the promise and the acceptance of a benefit in return for an improper advantage, such as in relation to goods or services.

QUALITY AND STANDARDS

The quality and safety of services and products are an important foundation of our business activities. Our business partners undertake to provide high-quality services and products that comply with all regulatory requirements. Relevant quality and safety requirements must be observed.

OCCUPATIONAL SAFETY AND HEALTH

The occupational safety and health of all employees are of the highest importance and must be taken into account in all activities. All business activities must be conducted in accordance with all applicable general and industry-specific occupational safety and health laws and regulations.

SUSTAINABILITY

Business partners must review and assess sustainability aspects of their business activities. They are expected to work with us toward sustainable conduct and to align such conduct with environmental, social, and governance considerations in a sustainable and long-term manner.

MELCHERS is a member of amfori – www.amfori.org. Our suppliers undertake to participate in audits through amfori and to cooperate in further MELCHERS ESG activities to the extent requested by MELCHERS.

WHISTLEBLOWING AND REPORTING VIOLATIONS

MELCHERS requires transparency and lawful conduct based on an open corporate culture. Employees, business partners, and third parties are therefore encouraged to report actual or suspected misconduct. For this purpose, MELCHERS has established various reporting channels, in particular the MELCHERS Ombudsperson: <https://www.melchers.de/en/hinweisgebersystem/>

MELCHERS expects business partners to provide their employees and business partners with appropriate and suitable reporting channels or grievance mechanisms as well. Whistleblowers must be protected in accordance with applicable legal requirements, and reports that are submitted must be appropriately followed up.

BUSINESS PARTNERS

EXPORT CONTROLS AND CUSTOMS

Our business partners must strictly comply with all applicable customs and foreign trade laws governing the import and export of goods, technologies, software, services, and financial transactions. Existing sanctions and embargoes must be observed. When supplying goods that may be subject to export controls in the event of a potential export, business partners must inform MELCHERS of any potential licensing requirement.

EMBARGOES AND TRADE SANCTIONS

In conducting their business activities, our business partners must review and comply with the applicable international trade control regulations relating to the import and export of services, goods, technologies, software, and financial transactions. They must not participate in trade-restrictive practices or boycotts that are prohibited or subject to penalties under applicable law.

TRADE SECRETS

If a business partner receives confidential information from MELCHERS, such information may be used only in an appropriate manner and solely within the scope of the contractual obligations with MELCHERS. The business partner must ensure that data requiring protection, as well as intellectual property rights of MELCHERS or third parties, are properly safeguarded.

COMPETITION LAW

Our business partners must not participate in business practices, transactions, or activities that violate applicable global, European, or national competition law, including antitrust law. This generally applies to interactions between current or future competitors as well as to cooperation with customers, suppliers, and distributors.

MONEY LAUNDERING

Business partners must comply with all applicable laws and regulations to combat money laundering and take appropriate steps to cooperate only with reputable business partners. Employees must inform their supervisors of payments or unusual financial transactions that appear inappropriate or suspicious to them.

PERSONAL INTEGRITY

CONFLICTS OF INTEREST

To ensure the integrity and transparency of our business relationships, it is essential that business partners avoid any form of conflict of interest. MELCHERS expects decisions to be made solely on the basis of objective considerations and not to be guided by personal interests. Business partners must proactively and promptly inform MELCHERS of any situation that could give rise to a conflict of interest and implement appropriate measures to avoid such conflicts.

(SOCIAL) MEDIA

MELCHERS recognizes the right to freedom of expression and the use of (social) media, but expects responsible and professional conduct in relation to company-related activities. In private and personal statements on social media, no impression may be created that the business partner or its employees are speaking on behalf of MELCHERS. Content that could harm MELCHERS, such as confidential, false, negative, unlawful, or unethical information, must not be disseminated.

POLITICAL ACTIVITIES

We respect the right of our business partners and their employees to participate individually in political processes and engage in political causes outside of business activities. However, personal political engagement must remain separate from business activities.

LEGAL AND OTHER REQUIREMENTS

In addition to the requirements of this Code of Conduct, business partners must comply with all applicable laws, regulations, financial requirements, local tax regulations, contractual agreements, and generally recognized standards.

Information on the implementation of the requirements of this Code of Conduct must be provided to MELCHERS upon request in order to enable assessment and dialogue between MELCHERS and the business partner.

REVIEWING, MONITORING, AND SANCTIONS BY MELCHERS

MELCHERS reserves the right to select, review, and, where appropriate, require remedial measures from business partners in accordance with criteria stipulated by MELCHERS Compliance Management. Direct business partners are required to pass on the principles and requirements described herein to their own business partners and to comply with all applicable statutory regulations. At MELCHERS, this Code of Conduct is a mandatory component of all contracts with business partners.

Any violation of the principles and requirements set forth herein will be regarded as a material breach of the contractual relationship by the business partner. In the event of suspected non-compliance with this document, for example, based on negative media reports, MELCHERS will request information regarding the relevant facts. MELCHERS reserves the right to terminate individual or all contractual relationships without notice for cause with business partners that demonstrably fail to comply with the principles set forth herein and do not take any measures to improve.

ACKNOWLEDGMENT, COMMUNICATION, AND IMPLEMENTATION

By signing the contract, the business partner undertakes to act responsibly and comply with the principles and requirements set forth herein. The business partner confirms that it has effectively communicated the content of this Code of Conduct to its employees, agents, subcontractors, and suppliers and has made it binding on them. The business partner further assures that all necessary measures to comply with this Code of Conduct will be properly implemented.

MELCHERS reserves the right to amend or supplement this Code of Conduct at any time where required due to legal, regulatory, or organizational requirements. The current version, which will be made available to the business partner in an appropriate manner, will apply, for example, at <https://www.melchers.de/en/>.

If there are any questions or suggestions regarding this Code of Conduct, or any concerns about unlawful conduct or misconduct, business partners may contact their MELCHERS contact persons or the responsible Ombudsperson.