

# BBC Cellpack GmbH Code of Conduct for Suppliers

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## **1. Principles**

We at BBC Cellpack GmbH and the Electrical Products Division have made it our mission to develop and market innovative products and solutions with high practical value for our customers so they can be even more successful.

At the same time, we lay the foundation for continuous, profitable growth and a sustainable, long-term increase in the enterprise value of BBC Cellpack GmbH to secure the company's future for generations to come. We base our actions on personal responsibility, honesty, loyalty, and respect for our fellow human beings both in and outside the firm, and the environment.

BBC Cellpack therefore provides this Code of Conduct to its suppliers with the aim of strengthening our common understanding of how sustainability should be implemented in everyday business.

BBC Cellpack expects its suppliers and subcontractors to agree to the principles outlined in this Code of Conduct. We also expect our suppliers to implement these standards in their downstream supply chains.

## **2. Integrity and Compliance**

We expect our suppliers to act ethically and with integrity in fulfill their social responsibility. This includes the following aspects:

### **2.1 Corruption**

No corruption, bribery, or extortion will be tolerated, as these preclude fair competitive conditions. Benefits connected to an intention of influencing business decisions, or which could create an appearance of influencing business decisions, or which concern the obtaining of any other improper advantage, are neither promised, offered, granted, demanded, or accepted in our business relationships nor do we allow ourselves to be promised such benefits. A particularly strict standard is to be applied when dealing with persons to whom special criminal and liability regulations apply (e.g. public officials).

### **2.2 Fair Competition**

Our suppliers act in accordance with national and international competition and antitrust law, and do not participate in price fixing, market or customer sharing or market or bid rigging.

### **2.3 Prevention of Money Laundering**

Money laundering refers to the process of smuggling illegally generated money or illegally acquired assets into the legal financial and economic cycle. Our suppliers comply with legal obligations to prevent money laundering, and thus do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

### **2.4 Protection of Information and Intellectual Property**

Our suppliers protect confidential information and respect intellectual property; technology and know-how transfers are made in a manner that protects intellectual property rights and customer information, trade secrets and non-public information. Our suppliers comply with applicable trade secrets laws, and treat confidential information of our business partners accordingly.

### **2.5 Data Privacy**

Our suppliers process, store, and protect personal data in compliance with legal regulations. Thus, personal data is collected confidentially, only for legitimate, previously defined purposes and in a transparent manner. Our suppliers only process personal data which is protected against loss, modification, and unauthorized use or disclosure by means of appropriate technical and organizational measures.

## 2.6 Export Control

Our suppliers undertake to comply with the relevant legal standards for export control in particular licensing requirements and export and support prohibitions in the context of the transfer and export of our goods.

## 2.7 Avoidance of Conflicts of Interest

Our suppliers avoid internal and external conflicts of interest that could illegitimately influence business relationships. Any conflicts existing despite such avoidance efforts are disclosed.

## 2.8 Notice of Infringements

Our suppliers shall make appropriate and reasonable efforts to continuously implement, document, and apply the principles and values outlined in this Code of Conduct. All employees are made aware of the contents of the Code of Conduct and trained on relevant topics as appropriate. Violations of the Code of Conduct will not be tolerated, and may lead to disciplinary labor-law consequences.

Employees and business partners are provided with access to a secure mechanism for confidentially reporting possible violations of this Code of Conduct.

## 3. Health and Safety

We expect our suppliers to provide a safe and healthy working environment.

Our suppliers protect their employees against any hazards and risks connected with use of infrastructure provided in the workplace. Our suppliers provide adequate controls, safe work procedures, preventive maintenance, and the necessary technical protective measures to reduce health and safety risks in the workplace. Where hazards cannot be adequately controlled by means of such measures, suppliers shall provide their employees with appropriate protective clothing. A safe and healthy working environment includes the availability of drinking water, adequate lighting, appropriate room temperature, good ventilation, and clean sanitary facilities.

## 4. Dealings with Employees

We expect our suppliers to respect human rights in their businesses and to treat their employees fairly and with respect. This includes the following aspects:

### 4.1 Prohibition of Child Labor

Our suppliers do not tolerate child labour<sup>1</sup>. They do not hire employees below the minimum age of 15, and require proof of age. In countries covered by the developing country exemption per ILO Convention 138, the minimum age may be reduced to 14 years. Our suppliers do not hire individuals below the minimum age of 18, pursuant to ILO Convention No. 182.

### 4.2 Prohibition of Forced Labor

Our suppliers do not permit forced labor, modern slave labor or comparable circumstances that deprive workers of their freedom these are prohibited. All work must be voluntary, and there must be a possibility of terminating the employment relationship.

### 4.3 Freedom of Association

Our suppliers are expected to maintain open and constructive communication with their workers and workers' representatives. They respect workers' rights to freedom of association, assembly, collective bargaining, and tariff bargaining to the extent legally permissible and possible under local laws.

#### **4.4 Promoting Diversity and Plurality**

Our suppliers are expected to promote equal opportunity and to not tolerate discrimination<sup>2</sup>. They treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology, or other personal characteristics.

#### **4.5 Compensation and Working Hours**

We expect our suppliers to pay their employees in accordance with applicable laws so as to afford a decent standard of living for individuals and their family members. Wage reductions as a disciplinary measure are only permitted in accordance with applicable national laws.

Working hours must accord with national laws and international standards customary in the industry. Weekly working hours, including overtime, may not exceed 60 hours, even in exceptional cases. Exceptions are permitted as regulated under a collective agreement.

All employees receive a comprehensible, written contract before starting work, which specifies wage conditions and the method of wage payment.

### **5. Environment, Energy, and Climate Protection**

We expect our suppliers to act in an ecologically responsible and resource-conserving manner, in compliance with applicable laws, oriented around international standards<sup>3</sup>.

#### **5.1 Resource and Climate Protection**

Our suppliers are expected to use natural resources sparingly. Negative impacts on the environment and climate should be minimized or eliminated at the point of origin, or through processes such as production modifications, substitution, recycling and reuse. To reduce electricity consumption and greenhouse gases, we expect our suppliers to commit to the development and use of climate-friendly products and processes.

#### **5.2 Waste and Emissions**

We expect our suppliers to put in place systems that ensure safety in the handling, transport, storage and recycling of waste, waste gases, and wastewater. Suppliers shall put in place systems that prevent or minimize accidental spills and releases of contaminated substances.

### **6. Conflict Minerals**

We expect our suppliers to not supply products to BBC Cellpack that contain materials mined in conflict regions.

Our suppliers take due diligence measures to avoid the use of conflict minerals in our products in order to prevent human rights abuses, corruption, and funding of armed groups.

### **7. Management Systems**

We expect our suppliers to implement management systems that support their company's compliance with applicable laws. This includes the following aspects:

- Top management has the responsibility of ensuring that the requirements per this Code of Conduct are complied with and implemented. Appropriate guidelines and processes must be in place to ensure this, and to fulfill the mandatory due diligence obligations of top management.

- Suppliers are to communicate the principles set out in this Code of Conduct throughout their supply chains.
- Our suppliers are required to meet the expectations set out in this Code of Conduct by providing appropriate resources for this purpose within their respective organization.
- Our suppliers are expected to implement processes to identify, determine, and monitor risks in all areas addressed in this Code of Conduct and in any applicable laws.
- Our suppliers are expected to produce appropriate documentation to demonstrate that they share the principles and values set out in this Code of Conduct. If the parties agree, BBC Cellpack may inspect this documentation.
- Our suppliers are to organize training to make their managers and employees appropriately aware of the contents of the Code of Conduct, applicable laws and regulations, and generally accepted standards.
- We expect our suppliers to continuously improve their sustainability performance through appropriate measures.

<sup>1</sup> ILO Conventions 79, 138, 142, and 182

<sup>2</sup> ILO Convention No. 111

<sup>3</sup> ISO 14001 and Standards of the OECD Guidelines/COP21