



**Code of Conduct for business partners — Overview**

Preamble	<p><b>I. Preamble:</b> W. Neudorff GmbH KG (hereafter “Neudorff”) offers a wide range of environmentally-friendly products for garden, house, balcony and terrace as well as for horticulture, landscaping and agriculture. One of the main objectives of Neudorff’s business activities is to make a positive contribution to sustainable development. We expect our suppliers and service providers (hereafter “business partners”) to make a binding commitment to observing the principles set out in this Code of Conduct.</p>
Conduct in the business	<p><b>1. Observance of laws, recognised standards and guidelines:</b> All current national laws and relevant international, recognised standards, principles and guidelines are to be observed.</p> <p><b>2. Avoidance of corruption:</b> The relevant statutory regulations to combat corruption must be respected.</p> <p><b>3. Antitrust and competition law:</b> Neudorff expects its business partners to observe all applicable national and international antitrust laws as well as laws against unfair competition.</p> <p><b>4. Confidentiality and data protection:</b> The business partner undertakes to observe data protection regulations.</p>
Work standards	<p><b>5. Occupational health and safety:</b> The business partner will ensure a safe, healthy and clean working environment and will take the necessary steps to prevent accidents and damage to health.</p> <p><b>6. Working hours:</b> Working hours must meet current national laws, industrial standards or the relevant ILO conventions, depending on which standard is strictest.</p> <p><b>7. Wages and social security benefits:</b> The business partner guarantees that the wages paid to its employees correspond at least to the statutory minimum wage or the wages prescribed for the relevant industrial sector, and that corresponding social security benefits are provided.</p>
Human rights and fundamental rights	<p><b>8. Human rights:</b> The business partner will respect, support and review the observance of internationally recognised human rights.</p> <p><b>9. Approach to child labour:</b> The exploitation of children and adolescents will not be tolerated. Child labour is forbidden.</p> <p><b>10. Approach to forced labour:</b> All forms of forced labour are forbidden.</p> <p><b>11. Freedom of association and right to collective bargaining:</b> The rights of all employees to freedom of association and collective bargaining must be respected and protected from impairment.</p> <p><b>12. Disciplinary measures and treatment of employees:</b> All employees must be treated with dignity and respect. Penalties, fines, other punishments or disciplinary measures may only be imposed in compliance with current national and international standards as well as internationally recognised human rights.</p> <p><b>13. Approach to discrimination:</b> Any form of discrimination is prohibited. It is expected that equal opportunities and gender equality are an integral part of the business partner’s corporate policy.</p>
Environmental protection	<p><b>14. Environmental protection and climate protection:</b> Neudorff expects its business partner to pay attention to environmental protection and climate protection with respect to current statutory requirements and international standards.</p> <p><b>15. Waste and emissions:</b> It is expected that the business partner will maintain procedures and systems which guarantee the safety of the handling, transport, storage, recycling, reuse and management of natural resources, materials and waste.</p> <p><b>16. Process safety:</b> It is presupposed that business partners will use safety programmes to manage and maintain their work processes in accordance with applicable safety standards.</p>
Product responsibility	<p><b>17. Product safety and responsibility:</b> All country-specific laws and statutory requirements with regulatory relevance must be observed and corresponding information sent to Neudorff on request.</p>
Implementation and requirements	<p><b>i. Implementation:</b> We expect our business partners to observe the principles outlined above.</p> <p><b>ii. Information and communication:</b> The business partner is required to make the rules in this Code of Conduct accessible to all employees.</p> <p><b>iii. Monitoring:</b> Neudorff reserves the right to check that the requirements outlined above are being observed.</p> <p><b>iv. Penalties and remedies:</b> Any serious breach of the obligations stated in the Code of Conduct will be viewed as a material breach of contract on the part of the business partner and will be legally assessed in each case.</p>

## Preamble

### I. Preamble

W. Neudorff GmbH KG (hereafter “Neudorff”) offers a wide range of environmentally-friendly products for garden, house, balcony and terrace as well as for horticulture, landscaping and agriculture. One of the main objectives of Neudorff’s business activities is to make a positive contribution to sustainable development.

In this context, we aim for a combination of economic success and social responsibility as well as environmental protection in order to satisfy current and future demands of society. This requires responsible management and a value added model structured for the long term. However, this also includes meeting our high expectations of our suppliers and service providers as well as their own suppliers, and observing the highest ethical standards as well as all applicable laws of the countries in which they operate.

This Code of Conduct for suppliers defines our requirements with respect to general business principles and fair competition, working standards, social standards, environmental protection and product safety which Neudorff expects its suppliers and service providers to observe.

The Code of Conduct applies to all suppliers and service providers with whom there is a direct business relationship (hereafter “business partners”).

## Conduct in the business environment

### 1. Observance of laws, recognised standards and guidelines

The business partner undertakes to observe all current national laws in all their business dealings and decisions, and will support the relevant internationally recognised standards, guidelines and principles contained in the Universal Declaration of Human Rights, United Nations Conventions, the UN Global Compact and the core labour standards of the International Labour Organisation (ILO) as well as the OECD principles for multinational companies. It is also expected that the business partner will respect their internal corporate directives and voluntary obligations entered into. The observance of this Code of Conduct as well as the standards specified above may not be subverted by supplementary understandings such as contractual agreements or similar measures.

### 2. Prevention of corruption

The business partner undertakes to observe international and local anti-corruption laws and standards. They may not attempt to unlawfully influence business partners, either at home or abroad, by exchanging gifts or by offering or accepting other benefits in kind and/or payments.

### 3. Antitrust and competition law

The business partner will observe all applicable national and international antitrust laws as well as laws against unfair competition. Fixing prices and terms with competitors is also prohibited as are any other agreements which distort competition including, in particular, agreements with competitors for the purpose of dividing up the market or customers.

### 4. Confidentiality and data protection

The business partner undertakes to observe current data protection regulations. Personal data may only be collected, processed or used if this is necessary for defined, clear and lawful purposes. The use of data must be transparent for data subjects; their right of information and rectification and if applicable, their right of objection, blockage and erasure must be upheld.

## Work standards

### 5. Occupational health and safety

We expect our business partners to provide a safe, healthy and clean working environment and to take all necessary steps to prevent accidents and damage to health which might arise in connection with the work. It must be ensured in the process that internationally recognised occupational safety standards are adhered to. In addition, the business partner will support continuous improvement of the working environment and will give priority to employee training to promote safety.

### 6. Working hours

Working hours must meet current national laws, industrial standards or the relevant ILO conventions, depending on which standard is strictest.

### 7. Wages and social security benefits

The business partner guarantees that the wages paid to their employees correspond at least to the statutory minimum wage or the wages prescribed for the relevant industrial sector. Social security benefits are also to be provided matching the relevant national or local standards.

## Human rights and fundamental rights

### 8. Human rights

The business partner will respect and support the observance of human rights (see United Nations Universal Declaration of Human Rights).

### 9. Approach to child labour

The exploitation of children and adolescents will not be tolerated. The business partner will respect the precepts of the United Nations on human rights and the rights of children, and in particular they undertake to observe the conventions on the minimum age for admission to employment and work (Convention 138 of the International Labour Organisation) as well as the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Convention 182 of the International Labour Organisation). If a national regulation provides for stricter standards with regard to child labour, the business partner must prioritise any such regulation.

### 10. Approach to forced labour

Any form of forced labour will not be tolerated. This means that the business partner will not use any workers who work against their will under threat of punishment including any compulsory overtime, bonded labour, prison labour, slavery or serfdom. The business partner also undertakes to take steps to prevent forced labour.

### 11. Freedom of association and right to collective bargaining

The business partner will respect the basic right of freedom of association and the right to collective bargaining as part of national legislation, and ensure that these rights are not compromised.

In the event that national standards restrict the right of association and the right to collective bargaining, the business partner should work to ensure that free, independent associations of employees for the purpose of conducting negotiations are facilitated and permitted.

### 12. Disciplinary measures and treatment of employees

Penalties, fines, other punishments or disciplinary measures may only be imposed in compliance with current national and international standards as well as human rights.

Neudorff expects its business partner to treat their employees with dignity and respect. The business partner will ensure that no employee suffers verbal, psychological, sexual and/or physical violence, coercion or harassment.

Page 4 of 5	<b>Code of Conduct ENG</b>
Valid from: 10.12.2018	<b>FB (K 3.1)-08</b>



### **13. Approach to discrimination**

Neudorff expects that the equal treatment of all employees will form an integral part of the business partner's corporate policy. The business partner will refrain from any form of discrimination, e.g. of ethical, national or social origin, on the basis of skin colour, gender, age, religion or ideology, political affiliation membership of an employee organisation, disability, sexual orientation or other personal characteristics. The business partner undertakes to remain an equal opportunity employer. Statutory regulations apply.

## **Environmental protection**

### **14. Environmental protection and climate protection**

Neudorff expects its business partner to minimise environmental pollution, pay attention to environmental protection and climate protection with respect to current international standards as well as statutory requirements and to continuously improve their performance. This includes the prevention of emissions and waste as well as taking steps to increase the efficient use of resources. To achieve this, suitable, transparent measures must be implemented and management systems (e.g. to ISO 14001 or equivalent) must be operated in order to ensure protection of the environment and climate. Neudorff expects its business partner to develop and manufacture their products as well as to package and transport them in ways that are safe and environmentally compatible.

### **15. Waste and emissions**

It is expected that the business partner will maintain procedures and systems which guarantee the safety of the handling, transport, storage, recycling, reuse and management of natural resources, materials and waste. Any generation or disposal of waste and any release of materials into the air or water which might have adverse effects on human health or the environment, must be reduced as far as possible, and materials must be appropriately handled, monitored and/or treated before they are released into the environment. The business partner is required to deploy appropriate procedures and systems to prevent or minimise any unintended or diffuse leakage or release of pollutants into the environment. The business partner is expected to maintain procedures and systems to optimise the use of all relevant resources such as power, water and raw materials on a sustainable basis.

### **16. Process safety**

Neudorff expects the business partner to deploy a management system to manage their work processes taking recognised standards into account. Specific risk analyses may have to be carried out for plants. For all plants, the business partner is to implement measures to prevent incidents, such as the swapping of chemicals and/or explosions.

## **Product responsibility**

### **17. Product safety**

Country-specific laws and statutory requirements must be observed. The business partner undertakes to furnish Neudorff in good time before delivery/performance with all the relevant product information, particularly regarding the composition, use (processing information, assembly instructions and health and safety measures) and if applicable, disposal of their products. Furthermore, documentation such as safety data sheets, labelling regulations, etc., must be complete in order to comply with the law. Information provided by Neudorff must be included in the relevant documents.



## Implementation and standards of requirements

### i. Implementation

The business partner must ensure that the requirements of this code are known to their own employees and to direct suppliers and service providers, and observed by them. If the business partner has produced their own Code of Conduct or a corporate policy with the requirements listed in this code, evidence must be provided that these are being adhered to. If they do not have their own Code of Conduct, etc., the business partner must commit to the present Code of Conduct and be able to demonstrate that they are observing the requirements specified. Neudorff recommends aiming for continuous improvement with the aid of a suitable management system (definition and documentation of responsibilities, procedures, targets and measures). Any breaches identified by the business partner must be remedied immediately and approaches for making improvements that can be derived from such breaches, must be thoroughly examined. Neudorff expects its business partner to work on disseminating the requirements of this code in their delivery chains.

### ii. Information and communication

This Code of Conduct can be viewed at any time on the internet at <https://www.neudorff.de/service/ueber-neudorff/nachhaltigkeit-philosophie/soziales.html> and printed out from there, and should be made accessible to relevant employees by the business partner.

### iii. Monitoring

Neudorff reserves the right to review the observance of the requirements specified above either itself or to have it reviewed on site by independent third parties, by means of certificates and statements or single issue audits.

### iv. Penalties and remedies

Any serious breach of the obligations specified will be viewed by Neudorff as a breach of contract by the business partner and will be legally assessed in each case. If possible, we will give the business partner a chance to implement appropriate remedial measures.

### Signature field for business partner

We hereby declare on behalf of our company that we have received Neudorff's Code of Conduct for suppliers, that we agree to the rules and standards specified above and undertake to recognise and observe all the principles and rules contained in this Code of Conduct. Or that as a result of our own Code of Conduct / our own corporate policy, we meet all the above-mentioned demands. We will send the corresponding documentation to Neudorff without delay:

Company: .....

Address: .....

Name (print): .....

Role: .....

Place, date: .....

Signature of authorised representative: .....

Stamp: .....