

Code of Conduct for business partners & suppliers

2024

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1. FOREWORD

TRUST, TRANSPARENCY AND RESPECT - OUR FOUNDATION FOR SUCCESSFUL COLLABORATION



This Code of Conduct defines the fundamental principles and standards that all suppliers of Bleher Folientechnik GmbH are asked to comply with. Our goal is to ensure a sustainable and ethically responsible supply chain.

Compliance with this Code as well as the CSR and sustainability requirements is an essential requirement for any business relationship with our company.

We are committed to environmental responsibility, high social standards and sustainable business practices.

Our business partners and suppliers are essential partners in the implementation of these values. We expect them to actively integrate these principles into their business processes.

By collaborating with us, our partners contribute to achieve positive impacts on the environment as well as social impacts around the world.

A key component of this partnership is compliance with the ILO OSH 2001 guideline, which provides comprehensive guidelines for occupational health and safety management systems and ensures safe and healthy working conditions. In addition, our suppliers are committed to comply with international labor and social standards, including the ILO core labor standards and the ISO 45001 and ISO 26000 standards, which concern working conditions, human rights and social responsibility.

This commitment remains in effect regardless of formal certification. Adhering to these guidelines guarantees the establishment of safe and healthy working conditions while ensuring that fundamental human rights are consistently respected and protected.

Managing Director of Bleher Folientechnik GmbH

A handwritten signature in black ink, appearing to read 'H. Bleher', written in a cursive style.

Hans Bleher



Compliance with laws

We are dedicated to ensuring that we adhere to all relevant laws and regulations at all times and that our actions are fully compliant with legal requirements.

2. COMPLIANCE WITH LAWS

Our business partners and suppliers are obliged to comply with all relevant national and international laws and regulations. This includes in particular:

2.1. Labor and social laws

Compliance with international standards and local laws on working hours, wages, health and safety in the workplace. This includes the implementation of the ILO core labor standards.

2.2. Environmental laws

Compliance with global and local environmental regulations to minimize environmental impacts, including the proper disposal of waste and the reduction of emissions. This includes adherence to the principles of the UN Global Compact and other relevant environmental initiatives.

2.3. Health and safety laws

Implementation of international standards and local regulations to protect the health and safety of employees, including ISO 45001 standards for occupational health and safety management systems. This includes fostering a safe working environment through preventive measures, risk reduction, and regular assessments of working conditions to continuously uphold the highest standards of protection.



2.4. Tax laws

Proper fulfillment of all tax obligations, including the accurate remittance of taxes and compliance with international tax regulations, such as the OECD Action Plan on Base Erosion and Profit Shifting (BEPS).

2.5. Export and import regulations

Adherence to all relevant international trade regulations, including customs and export control laws, as well as the management of trade restrictions and embargoes.

2.6. Anti-corruption and anti-bribery laws

Adherence to international anti-corruption standards, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, as well as local laws prohibiting bribery and undue influence.

2.7 Data protection and data security laws

Adherence to global data protection regulations, including the EU General Data Protection Regulation (GDPR), as well as other applicable laws and standards safeguarding personal data.

2.8 Competition and antitrust laws

Adherence to international and national competition and antitrust laws to avoid anti-competitive practices, including price collusion and market manipulation.



Human and labor rights

We respect human rights and fair working conditions and are committed to taking action to prevent any form of discrimination or exploitation.

3. HUMAN AND LABOR RIGHTS

3.1. Commitment to Human Rights

Suppliers are obliged to respect and protect the universal human rights of all employees. This includes the right to dignity, freedom and justice.

3.2. Prohibition of child and forced labor

Any form of child labor and forced labor is strictly prohibited. Suppliers must ensure that all employees work voluntarily and have reached the legal minimum age.

3.3 Non-discrimination

Discrimination based on gender, race, ethnic origin, religion, age, disability, sexual affiliation or political views is not permitted. All employees must be treated equally, regardless of individual characteristics. The organization shall promote a respectful working environment in which diversity is appreciated. Discrimination is actively combated through training and clear procedures for reporting cases of discrimination. Every employee has the right to work in a discrimination-free environment, which contributes to a positive company culture

3.4. Transparency in Communication

Employees are entitled to clear and honest information concerning company policies, changes, and decisions that impact their working conditions. Transparent communication fosters trust, collaboration, and a positive workplace atmosphere in which all employees feel appreciated.

3.5 Freedom of association and right to collective bargaining

Suppliers are required to respect employees' rights to organize, join trade unions, and engage in collective bargaining without fear of retaliation. They should foster an open and constructive dialogue with employee representatives to collaboratively develop solutions and cultivate a collaborative work environment. This approach contributes to respectful interactions and enhances employee retention.



Respect for human and labor rights is of fundamental importance to us. We are dedicated to ensuring fair working conditions, promoting equal treatment, and

These principles are closely aligned with our corporate values, which guide our daily actions and decisions.

Our corporate values:

- Integrity
- Positivity
- Environmental protection
- Partnership
- Inspiration
- Growth
- Individuality
- Responsibility



Working conditions

Our work environment is safe and supports the well-being of our employees.

4. WORKING CONDITIONS

4.1. Fair compensation

Compensation must comply with or exceed the statutory minimum wage and industry standards. All wages and salaries are to be disbursed promptly and in full. Furthermore, remuneration should be appropriate to the qualifications and experience of the employees. Regular performance evaluations should be conducted to ensure that compensation remains equitable and competitive within the market.

4.2. Working hours and overtime

Working hours must comply with legal requirements. Overtime should only be undertaken on a voluntary basis and must be compensated accordingly.

4.3. Health and safety at work

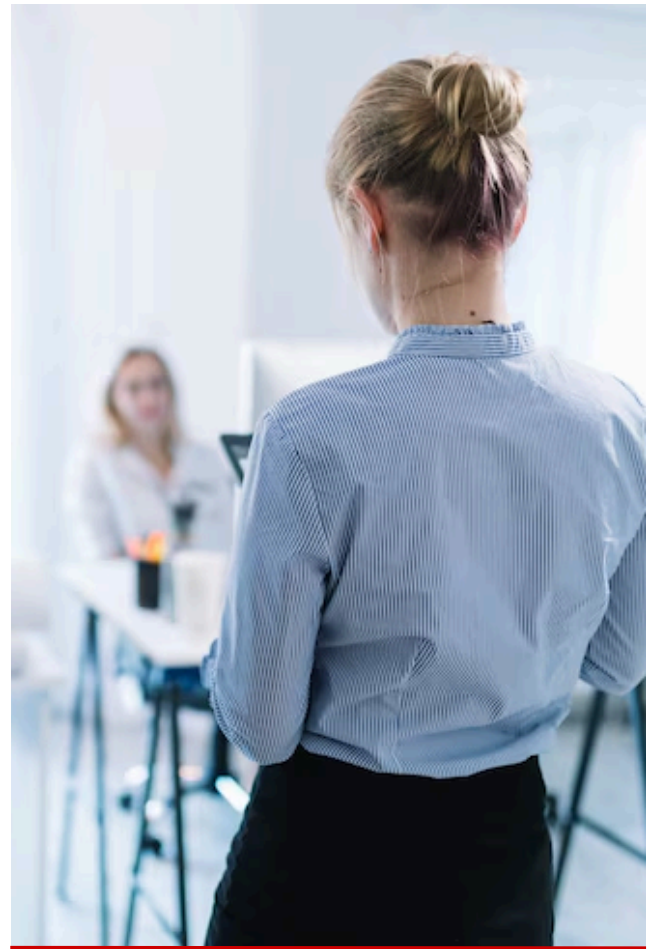
Suppliers are required to provide a safe and healthy working environment. This obligation includes adherence to the ILO OSH 2001 guidelines and other relevant standards.

4.4. Employment contracts and assurance

Every employee must receive a clear and understandable employment contract that describes the rights and obligations of both parties. Contracts should include information regarding working hours, remuneration, vacation days, and notice periods. Suppliers are encouraged to implement measures that promote job security, including professional training opportunities. Transparent procedures for communicating working conditions and any changes are essential for fostering a safe and stable working environment.

4.5. Education and training

Suppliers should facilitate access to training and education initiatives to continuously enhance the professional development and skills of employees.



This can be achieved by offering training sessions, workshops, and online courses tailored to the specific needs of employees. Suppliers should also cultivate a learning culture that encourages the exchange of knowledge and experiences among employees.



Collaboration with business partners and third parties

We integrate a respectful and transparent business relationships founded on the principles of integrity and fairness.

5. COLLABORATION WITH BUSINESS PARTNERS AND THIRD PARTIES

5.1. Integrity and fairness

Our business partners are obliged to conduct their business relationships based on integrity and fairness. Unfair business practices, deception and fraud are strictly prohibited.

5.2 Prohibition of corruption and bribery

All forms of corruption, bribery, and undue influence are strictly prohibited. This encompasses the offering, promising, or acceptance of gifts, payments, or any other benefits that could potentially influence the decision-making process.

5.3. Transparency and communication

Business partners are expected to maintain openness and transparency in their business practices. Important information should be communicated honestly and comprehensively to foster trust and facilitate seamless cooperation.

5.4. Avoiding conflicts of interest

Business partners are required to avoid any conflicts of interest that could compromise their independence or objectivity in the business relationship. Personal or financial interests must not take precedence over the interests of the partnership under any circumstances.

5.5. Confidentiality and data protection

All information shared as part of the business relationship must remain confidential. Business partners are responsible for ensuring that personal data and other sensitive information are protected in accordance with relevant data protection regulations.

5.6. Compliance with laws and regulations

Business partners are required to comply with all relevant laws, regulations and industry standards that apply to their business relationships. This includes international trade laws, anti-money laundering regulations and trade controls.

5.7. Trade control

Business partners are obligated to comply with all applicable export and import controls, sanctions, and embargoes in the countries in which they conduct business. This includes adhering to national and international regulations governing the movement of goods across borders, as well as trade with sanctioned countries, organizations, and individuals.

5.8. Dealing with suppliers and subcontractors

Business partners are required to uphold the same high ethical standards with their own suppliers and subcontractors. The responsibility for adhering to the Code of Conduct extends throughout the entire supply chain.



Health and safety

The health and safety of our employees is of essential importance, we are committed to continuously ensuring a safe working environment.

6. HEALTH AND SAFETY

6.1. Safe working conditions

Suppliers are obliged to ensure a safe and healthy working environment for all employees. Workplaces must comply to national and international safety standards, ensuring that all necessary measures are in place to prevent accidents and injuries.

6.2. Occupational safety management

Suppliers must implement an effective occupational health and safety management system in line with the ILO OSH 2001 guidelines. This system should include regular risk assessments, training and emergency plans to ensure the health and safety of employees.

6.3. Training and awareness-raising

Employees must receive regular training on health and safety protocols, with a particular focus on the correct use of personal protective equipment (PPE), first aid, and specific workplace risks. Additionally, regular update courses should be offered to increase employees' awareness of potential dangers and encourage proactive safety behaviors. These efforts play a crucial role in enhancing workplace safety and preventing accidents over the long term.



The health and safety of all employees is our utmost priority. Every employee is responsible for actively minimize hazards and to promptly report any potential risks.

Compliance with safety regulations and responsible behavior are essential for creating a safe working environment and to reduce the risk of accidents.

6.4. Reporting and accident prevention

All accidents, injuries and unsafe working conditions must be reported and documented immediately. Suppliers must take ongoing measures to prevent accidents and continuously improve safety standards.

6.5. Health care

Suppliers should implement health programs that promote employee well-being, including regular medical examinations, access to health services, and initiatives to encourage healthy living.





Environmental protection

We are actively committed to protect the environment by promoting sustainable practices and to use resources economically.

7. ENVIRONMENTAL PROTECTION

7.1. Compliance with environmental laws

Suppliers are required to adhere to all applicable national and international environmental laws and regulations. This includes meeting emission limits, following waste disposal guidelines, and ensuring the protection of natural resources.

7.2. Sustainable production and supply chain practices

Suppliers should implement sustainable production methods and practices throughout the supply chain. This includes selecting sustainable materials, minimizing packaging, recycling and reusing resources, and procuring raw materials in an environmentally responsible manner.

7.3. Recycling and waste management

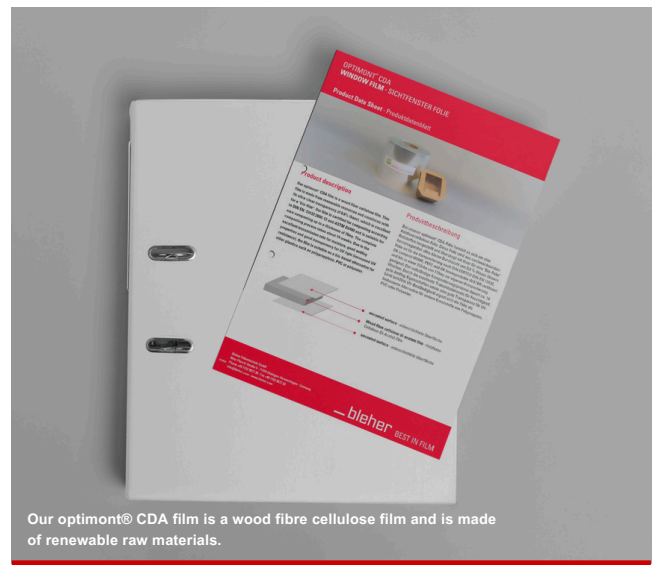
Suppliers must establish effective recycling and waste management systems to optimize material reuse and significantly reduce the volume of waste sent to landfills. This process includes sorting and separating waste materials, reintegrating recycled materials back into the production process, and collaborating closely with waste disposal companies to ensure compliance with regulations.

7.4. Prevention and reduction of environmental pollution

Suppliers must take measures to prevent and minimize environmental impacts, including air and water pollution, noise pollution, and waste generation. This also involves reducing greenhouse gas emissions and utilizing sustainable materials and processes.

7.5. Resources and energy efficiency

Suppliers are required to implement measures that conserve resources and enhance energy efficiency in their production processes. This includes reducing energy consumption, utilizing water and raw materials efficiently, and minimizing waste generation.



7.6. Environmental management systems

Suppliers are encouraged to adopt environmental management systems, such as ISO 14001, to continually enhance their environmental performance. These systems should encompass regular environmental assessments, target-setting, and action plans aimed at reducing environmental impacts.

7.7. Reporting and transparency

Suppliers should provide regular reports on their environmental performance and offer transparent information regarding the measures taken and progress achieved in environmental protection. This nurtures trust and supports ongoing improvement.



Quality and product safety

We are committed to ensure the highest standards of quality and product safety for all our products / services.

8. QUALITY AND PRODUCT SAFETY

8.1. Compliance with quality standards

Suppliers must ensure that their products and services meet agreed quality standards and comply with all relevant legal and regulatory requirements. Quality management systems should be implemented and regularly monitored to maintain these standards.

8.2. Product safety

Product safety is one of our highest priority. Suppliers are required to conduct thorough safety checks and tests to ensure that their products do not pose any risks to the health or safety of customers.

8.3. Traceability

Complete traceability of all products and materials must be ensured. This includes thorough documentation of all production and delivery processes to enable tracing the origin and status of products in the event of a concern.

8.4. Recall management

Suppliers must establish well-defined procedures for a recall management. If any quality or safety defects are identified, immediate action must be taken to address them. Prompt execution of recalls is essential when necessary.

8.5. Training and qualification

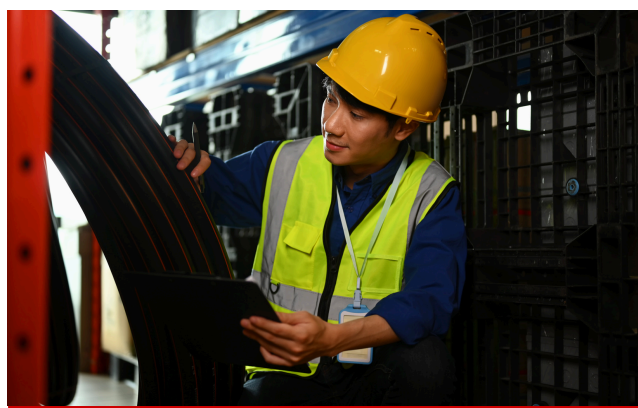
All employees involved in production, quality control and product safety shall be trained and qualified on a regular base. Trainings should cover current standards and best practices.

8.6. Continuous improvement

Suppliers should establish continuous improvement processes in their quality management systems. Regular evaluations and adjustments of quality controls and procedures are necessary to continuously improve product quality and safety.

8.7. Certifications and Standards

Suppliers should comply with relevant quality and safety certifications and standards required for their industry and products. These certifications serve as proof of compliance with high standards of quality and product safety.





Monitoring and compliance

Monitoring and compliance with the Code of Conduct ensures ethical behavior and integrity in our company.

9. MONITORING AND COMPLIANCE

9.1. Monitoring

Regular audits and tests are conducted to identify potential risks at an early stage. These measures ensure that both internal and external partners adhere to established standards while facilitating continuous improvements.

9.2. Reporting of Noncompliance

Suppliers and business partners are required to report any instances of noncompliance with this code immediately. Appropriate reporting systems are in place to ensure that indications of rule breaches or potential hazards can be reported without fear of reprisals. Prompt and transparent communication allows the company to respond swiftly and effectively to any reported noncompliance.

9.3. Measures in case of Noncompliance

Suppliers must establish clearly defined procedures for the resolution of concerns and recall management. If quality or safety deficiencies are identified, corrective action must be taken immediately to minimize potential damage and ensure safety. If necessary, recalls must be organized promptly and executed effectively to prevent adverse impacts on the supply chain and customers. Proactive collaboration with the company is expected to implement solutions as swiftly as possible.

9.4. Training

Regular training ensures that all employees and partners know and comply with the requirements of the Code of Conduct.

9.5. Documentation

All monitoring and auditing activities conducted must be thoroughly documented to ensure compliance with the code. This documentation not only facilitates traceability but also serves as a foundation for regular evaluations and process optimization. The emphasis is on continuously improving work processes and safety standards to ensure sustainable and responsible business practices.



Would you like to report a Noncompliance?

Contact:

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norbert.sawodniok@bleher.com



Data protection and information security

Data protection is a highly important topic for us. We treat all data confidentially and in accordance with applicable data protection laws.

10. DATA PROTECTION AND INFORMATION SECURITY

10.1. Compliance with data protection laws

Suppliers and business partners must comply with all applicable data protection laws and regulations to ensure the protection of personal data.

10.2. Confidentiality of information

Confidential information exchanged within the scope of the business relationship must be treated confidentially and used exclusively for the agreed purposes.

10.3. Security measures

Appropriate technical and organizational measures must be taken to protect data from unauthorized access, loss, destruction or manipulation. This includes regular security checks and updates.

10.4. Access rights

Access rights to confidential information must be restricted to authorized persons and managed through strict access controls.

i We treat information with the utmost confidentiality and process it solely in accordance with applicable data protection laws. The data we collect is used exclusively for its intended purpose, ensuring it is handled responsibly. We implement a range of robust measures to protect this information from unauthorized access. Furthermore, our security measures are continuously reviewed and proactively enhanced to ensure the highest level of protection for your data at all times.

10.5. Data Management and Transmission

Data Management and Transmission may only take place in accordance with contractual agreements and legal requirements. Appropriate data processing contracts must be concluded.



10.6. Incident management

In the event of a data protection incident or a security breach, immediate action must be taken to remedy the incident and the persons affected and the relevant authorities must be informed without any delay.

10.7. Training

Employees must receive regular training to enhance their awareness of data protection and information security, ensuring that all requirements are consistently achieved.

11. CONCLUSION

We emphasize the critical importance of adhering to this Code of Conduct and expect all our suppliers and business partners to comply with the standards set forth herein.

This Code is fundamental to maintaining a trusting and ethical business relationship. The Code of Conduct is subject to regular review and updates as needed to ensure alignment with current legal requirements and ethical standards. Any modifications will be communicated promptly to ensure that all partners remain informed.

We value constructive feedback and suggestions for the enhancement of this Code of Conduct. Insights are of utmost importance and will be meticulously evaluated as the organization continues to refine the Code of Conduct and uphold its commitment to the highest standards.

Noncompliance with the provisions of this Code of Conduct will be treated with the utmost seriousness. Depending on the severity of the noncompliance, appropriate actions may be taken, including the potential termination of the business relationship. Adherence to the Code of Conduct is essential for fostering a successful and trustworthy business relationship.

For any inquiries regarding compliance or the reporting of noncompliance, please reach out to our Compliance Department or the designated contact person (Contact see page 17) . If there are any uncertainties or concerns, please feel free to request further information.

12. CONFIRMATION

We hereby confirm that we have thoroughly reviewed and comprehended the Code of Conduct for suppliers and business partners of Bleher Folientechnik GmbH. We hereby commit to upholding the principles and standards articulated therein.

Name of the supplier:

.....

Name, First name of the authorized person:

.....

Function of the authorized person:

.....

Signature of the authorized person:

.....

.....
Place, Date

.....
Company stamp

Imprint

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