

Supplier Code of Conduct



NORDMANN

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1. Preface

Responsible corporate management at Nordmann has played an important role since the company's foundation in 1912 and continues to be a central corporate element and base of all our activities.

We are aware that we have reciprocal relationships with a variety of stakeholders, including our employees, suppliers, customers, the general public and the environment. We consider their legitimate demands in all our company decisions and activities, and we act accordingly in a responsible manner. We also expect our suppliers and their supply chains to abide by applicable laws and follow internationally recognized environmental, social and governing standards as well as to uphold the same ethical values and compliance responsibilities by acting with the same fairness in all aspects of their own business practices.

For this reason, Nordmann enforces this Supplier Code of Conduct, which reflects basic principles also laid down in the guidelines of Nordmann's Code of Conduct¹ and contains the minimum standards that Nordmann expects from its suppliers.

2. Legal Compliance

Compliance with the laws and legal systems of the respective countries in which we conduct business as well as acceptance of all overall applicable law and regulations as e.g. UN regulations is of fundamental importance to Nordmann. Each of our suppliers is also obliged to comply with the laws, rules and legal regulations of the applicable legal systems of the countries in which they operate. All courses of action which are illegal or which would result in liability claims are prohibited.

Within its sphere of influence, Nordmann therefore expects its suppliers to comply with the relevant international laws and standards of conduct.

Our suppliers are also expected to implement and maintain a system to ensure compliance with such laws, rules and legal regulations, covering both their own operation and that of their supply chain.

Furthermore, we encourage suppliers to go beyond basic legal compliance and to enforce compulsory regulations on human rights, labour standards and anti-corruption measures².

3. Fair Competition

Fair competition is a prerequisite for free market development and the associated social benefits. Accordingly, the precepts of fairness, transparency and traceability also apply. More specifically, the United Nations and Organization for Economic Co-Operation and Development

¹ Nordmann's Code of Conduct: [Code of Conduct](#)

² For example the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at work and the United Nations Convention Against Corruption.

(OECD) convention against corruption is the most important law in relation to foreign corrupt practices and must be actively enforced.

Nordmann suppliers commit themselves to engaging in fair competition and complying with current anti-trust and business laws. Further, Nordmann pays very close attention to compliance with fair trade laws. All suppliers are expected to apply due diligence to prevent and detect any corruption in business arrangements. Nordmann will not knowingly conduct business with any supplier who has been suspected of corruption or any related crime. This also includes money laundering, terrorism financing or participating in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

Nordmann does not tolerate any form or engages directly or indirectly in any form of corruption or bribery.

3.1. Anti-Trust, Fraud and Deception

We expect our suppliers to act fairly and with integrity in their competition for market share. Suppliers shall neither engage nor tolerate any form of corruption, bribery, theft, fraud, deception or extortion including any payment or other benefit for the purpose of influencing the decision-making process whether or not in violation of any applicable laws. Suppliers must also refrain from participating in a cartel.

3.2. Illegal Payments

Our suppliers are expressly expected never to offer, grant, demand or accept any bribes, payoffs, kickbacks, incentives, inappropriate gifts, favours or any other benefit from any person or organisation for business opportunities with or in any other way related to the business operations of Nordmann. Similarly, Nordmann will not accept bribes, kickbacks, incentives, inappropriate gifts, favours or other benefits from a supplier or business partner for the purpose of obtaining an improper advantage. This includes to renounce from giving or accepting improper facilitation payments.

A reciprocal zero-tolerance rule applies to dealings with public authorities and representatives; this means no gifts or invitations are to be exchanged or extended. Nordmann and its suppliers dissociate themselves expressly from the payment of so-called "acceleration money" or any other form of bribery.

3.3. Insider Trading

Suppliers are expressly prohibited from trading information or using any material or non-publicly disclosed information gained by virtue of business activities with Nordmann as the basis for shares acquisition or to enable others to trade with stocks or securities in the relation to any business with Nordmann. The term 'insider trading' refers to such practices of using specific information not publicly known and related to a stock noted company as a way of influencing the stock exchange or market price, if they were published.

4. Respect for the Basic Human Rights of Employees

Our suppliers must observe the basic human rights set forth in the Universal Declaration of Human Rights of the United Nations³ and are expected to address any violation of human rights associated with any operation of Nordmann.

4.1. Fairness, Tolerance and Equal Opportunity

We respect the personal dignity, privacy and fundamental human rights of each individual. We support equal treatment and equal opportunities for our employees. Against this background our suppliers shall provide equal employment opportunity and fair working conditions to all their employees and applicants and should act without any kind of discrimination on the grounds of nationality, culture, religion, ethnic origin, sex, sexual orientation or age. Furthermore, we expect our suppliers to comply with the core labor standards of the International Labour Organization (ILO), including the right of freedom of association and assembly.

In keeping with our company principles and with the core labor standards of the International Labour Organization (ILO)⁴, we do not tolerate any form of discrimination and unacceptable treatment of employees, such as bullying and/or sexual or personal harassment.

In addition, our suppliers comply with the statutory employment laws – particularly those concerning maximum working hours and minimum wages – respective to the country that they work in. If there are no statutory regulations on the minimum wage, the supplier shall ensure sufficient payment to secure the livelihood of the employees.

4.2. Child Labor

We expect all our suppliers to expressly prohibit any kind of child labor within their organization or within any of their supply chain.

The term “child” herein refers to any person under the minimum legal age for employment applicable within the country of the supplier. This legal age must also conform to the minimum working ages specified by the International Labour Organization (ILO) Convention 138 or for hazardous work by the ILO Convention 182. This means that suppliers are expected to verify the dates of birth when appointing new employees and to document this in the personnel file; and to not employ any workers under the age of 14 or for hazardous work under the age of 18.

³ Declaration of Human Rights of the UN:

⁴ Convention No. 87 – Freedom of Association and the Rights to Organise, 1948

Convention No. 98 – Right to Organise and Collective Bargaining, 1949

Convention No. 29 – Forced Labour, 1930

Convention No. 105 – Abolition of Forced Labour, 1957

Convention No. 100 – Equal Remuneration, 1951

Convention No. 111 – Discrimination (Employment and Occupation), 1958

Convention No. 138 – Minimum Age, 1973

Convention No. 182 – Prohibition and Immediate Action for the Elimination of the Worst Form of Child Labour, 1999

4.3 Forced Labor

Suppliers must prohibit human trafficking or any other kind of forced labor and ensure that minimum standards of employment law are enforced. The prohibition of unfair labor practices applies especially to unreasonable wages and disproportionate working hours.

5. Health and Safety of Employees

We expect all of our suppliers to enforce fair and safe working conditions and ensure compliance with all applicable local law and furthermore, to promote good health and safety standards as a fundamental principle. We demand that our suppliers create an employment environment that is free from any physical, psychological, verbal or any other form of abusive conduct and to implement a high standard of occupational health and safety. All suppliers are expected to provide a safe working environment for all employees that strives to prevent accidents and minimizes health risks as much as possible (for example in accordance with OHSAS 18001, which is based on ISO 9001 and ISO 14001, or any national equivalent). This also includes a protected mechanism for employees to report possible violations of the principles of this Supplier Code of Conduct.

6. Sustainability

We expect our suppliers to comply with all applicable laws and regulations on environmental protection and should preserve resources and protect the environment as much as possible. Suppliers are expected to establish and maintain – as far as possible – a suitable environmental management system (such as DIN EN ISO 14001 or equivalent) in order to minimize their environmental pollution and make continuous improvements in environmental protection.

7. Handling of Information / Intellectual Property Rights / Data Protection

Open communication requires accurate reporting. Fundamental business processes need to be documented properly and truthfully. Information which is pertinent to accounting must be gathered completely, accurately and in keeping with the policy of financial integrity.

All suppliers must comply with all applicable laws and regulations governing intellectual property rights, protection against disclosure, patents, copyrights, trademarks and any other proprietary know-how. Moreover, suppliers must protect and secure any business information of Nordmann in strict confidence and should not improperly use or disclose such information to third parties, unless an explicit authorization from the disclosing party is given. A high standard of data integrity and of technical safeguards against any unauthorized access must be guaranteed.

Our suppliers are expected to process personal data confidentially and responsibly, respect everyone`s privacy and ensure that personal data is effectively protected and used only for legitimate purposes according to applicable rules and laws.

8. Global Trade Compliance

Our suppliers must ensure that their business practices are in full accordance with all applicable laws and regulations governing the export and import of parts, components, services, and technical data.

9. Conflict Mineral / REACH / Dangerous Goods

Suppliers must comply with applicable laws and regulations regarding conflict minerals which include tin, tungsten, tantalum and gold. Suppliers must also comply with European regulation (EG) No 1907/2006 for Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), when delivering materials into the European Union.

Our suppliers should take steps to determine if the tin, tungsten, tantalum and gold which may be contained in their products do not directly or indirectly finance or benefit armed groups, especially in Conflict-Affected and High-Risk-Areas (CAHRAs).

Our suppliers should exercise due diligence on the source of these minerals and require the same from their next tier suppliers.

Suppliers must comply with applicable laws on the transport of dangerous goods.

10. Ethical Expectations

We expect our suppliers to always compete in a fair and ethical manner and to take decisions based only on objective business criteria (no personal, family or financially questionable criteria). In support of that, every supplier must keep all internally or externally produced records accurate and truthful. Suppliers should also strive to foster a professional climate in which their employees feel encouraged to raise and address any legal or ethical issues without fear of punitive action or retaliation.

We expect our suppliers to provide their employees avenues for raising legal or ethical issues or concerns without fear of retaliation. Suppliers are also expected to take action to prevent, detect, and correct any retaliatory actions.

11. Compliance with this Supplier Code of Conduct

11.1 Our expectations of our suppliers

Our suppliers are strongly encouraged to implement their own written code of conduct and to establish a management system to support compliance with all applicable laws and regulations. To clarify any issues related to this Supplier Code of Conduct, the supplier should contact Nordmann.

11.2 Integrity Line

Violations of this Supplier Code of Conduct may result in detrimental consequences for the relationship between any of the Nordmann's companies and the supplier. The supplier is

therefore strongly encouraged to immediately report and – as far as possible – correct any observed violations or questionable issues.

A whistleblower system, called **Nordmann Integrity Line**, is also available for reporting any significant violations of the (Supplier) Code of Conduct – particularly illegal business practices. This system operates in several languages and permits a confidential and specially encrypted dialogue with the Nordmann Compliance Department (anonymous on request).

You can access the Nordmann Integrity Line via the following link:

<https://gnhgroupcompliance.integrityline.com>

Phone: +49-30-99257146 – Company Code 4125

Contact:

Nordmann, Rassmann GmbH
Kajen 2
20459 Hamburg, Germany

Tel.: +49 (0) 40 / 3687-0

Fax: +49 (0) 40 / 3687-249

E-mail: info@nordmann.global

General Disclaimer

This Supplier Code of Conduct is in no way intended to conflict with or modify the conditions of any existing contract. In the unlikely event of a conflict, the Supplier Code of Conduct is secondary to any contract terms.

Main References

- *Nordmann´s Code of Conduct*
www.nordmann.global/en/chemical-supply-chain-services/quality-safety-legislation
- *United Nations Global Compact*
www.unglobalcompact.org
- *Universal Declaration of Human Rights*
www.un.org/en/rights
- *International Labour Standards (ILO)*
www.ilo.org/global/standards/lang--len/index.htm
- *United Nations Convention against Corruption*
<http://www.unodc.org/unodc/en/treaties/CAC/index.html>
- *OECD convention against corruption*
<http://www.anticorruption.ie/en/ACJS/Pages/WP08000004>
- *OHSAS 18001 Healthy & Safety Standard*
www.ohsas-18001-occupational-health-and-safety.com
- *International Organization for Standardization (ISO)*
www.iso.org