

## CODE OF CONDUCT FOR BUSINESS PARTNERS

Welton Bibby & Baron Ltd is committed to legally compliant and socially responsible corporate governance. We are expressly committed to respecting and protecting human rights and the environment and to complying with the relevant regulations.

Sustainability has always been an integral part of our corporate philosophy and business activities. As an internationally active, independent and owner-managed company, we are only successful in the long term if ecology, economy and social issues are in harmony. Maximum process and product safety play a major role at Welton Bibby & Baron, as does the avoidance of environmental risks.

Welton Bibby & Baron is committed to honesty and integrity in all our business activities towards employees, customers and suppliers along the entire value chain. We also expect our employees to observe the principles of ecological, social and ethical behavior and to integrate them into the corporate culture. The standards and principles of conduct set out in this Code therefore also apply without restriction to our employees.

We expect our business partners to act with the same fairness, honesty and responsibility in all aspects of their business and to stand up for sustainability and integrity. This Code of Conduct therefore forms the basis for all future business relationships. A breach of this Code may ultimately be the reason and cause for termination of the business relationship.

### COMPLIANCE WITH LAWS, RULES AND REGULATIONS

The Business Partner shall comply with all applicable laws and regulations in force in the countries in which it operates and shall take all necessary measures to ensure compliance with such laws and regulations.

### HUMAN RIGHTS AND SOCIAL RESPONSIBILITY

The business partner respects the internationally recognized human rights set out in the Universal Declaration of Human Rights and standards of the International Labour Organization (ILO) and will ensure healthy and fair working conditions worldwide. In accordance with the respective applicable national laws, these include in particular, but are not limited to, the following standards:

- The prohibition of child labor
- The prohibition of forced labor, including all forms of modern slavery and human trafficking
- The rejection of any form of unequal treatment and discrimination, in particular with regard to nationality, ethnicity, gender, disability, age, sexual orientation, political affiliation, religion and ideology
- A working environment free from violence and reprisals
- Fair and transparent remuneration that is at least equivalent to the statutory minimum wage in the countries concerned
- Reasonable working hours and sufficient rest periods
- A safe and healthy working environment in accordance with the applicable occupational health and safety obligations and statutory regulations
- Responsible safety measures for all security personnel employed by the business partner
- Respect for the right to freedom of association and collective bargaining
- Respect and recognition of the existence of land use rights

## **ENVIRONMENTAL PROTECTION AND ECOLOGICAL RESPONSIBILITY**

The business partner complies with all national and international environmental standards and laws applicable to its location and ensures continuous improvements in environmental protection.

The business partner is responsible for continuously improving the environmental compatibility of its products and reducing the use of natural resources. The business partner will use resources sustainably by reducing the consumption of energy, water and raw materials in its own operational processes and its value chains. In particular, the business partner shall ensure that its business activities do not have such an impact on natural resources that the production of food is significantly impaired or that people no longer have access to sanitary facilities and safe drinking water, thereby damaging people's health. It will take appropriate measures to ensure compliance with climate protection, air quality, noise protection, water protection and biodiversity.

The business partner shall use its best efforts to ensure that the handling, storage, transportation, reuse, recycling and disposal of all types of waste and waste water are carried out safely and in accordance with regulations. In doing so, the business partner shall comply with all requirements of the Minimata Convention of October 10, 2013 (use of mercury), the Stockholm Convention of May 23, 2001 (persistent organic pollutants, POPs) and the Basel Convention of March 22, 1989 (transboundary movements of hazardous waste and their disposal).

## **PRODUCT SAFETY AND PRODUCT QUALITY**

The business partner develops, produces and distributes safe and high-quality products. Generally recognized quality standards and the contractually agreed quality requirements must be met. If the business partner recognizes problems in the quality of the goods and services, it shall rectify these immediately.

## **TRADE AND BUSINESS SECRETS AND INTELLECTUAL PROPERTY**

The business partner shall ensure that confidential business information or secrets of which it becomes aware in connection with its business activities with Welton Bibby & Baron are kept strictly confidential and are not used in an unauthorized manner or disclosed to third parties.

The business partner shall respect Welton Bibby & Baron's registered and unregistered intellectual property and protect and safeguard it as confidential information. It may not be used for purposes other than those agreed in the individual case, unless such use is permitted under applicable law.

## **DATA PROTECTION**

The business partner shall comply with the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting and passing on personal information.

## **AVOIDANCE OF CORRUPTION**

Welton Bibby & Baron firmly rejects any form of corruption. The business partner shall not exploit business relationships with Welton Bibby & Baron for its own benefit or that of others, or to the detriment of Welton Bibby & Baron. The business partner shall comply with all applicable laws and regulations on corruption, bribery, theft, embezzlement and extortion. Illegal payments or other benefits to an individual or company with the aim of influencing a decision that violates applicable law will not be tolerated.

## FAIR COMPETITION

The business partner shall ensure that its business practices are compatible with applicable antitrust and competition law. Therefore, the business partner shall not enter into any agreements with competitors or take any other actions that may unfairly influence competition.

## SUPPLY CHAIN

The business partner will implement due diligence processes to identify, prevent and minimize risks for the violation of human rights and environmental impacts in its own supply chain. In doing so, the business partner shall require compliance with this Code of Conduct (or an equivalent code of conduct) by its subcontractors and other business partners along the supply chain.

The business partner shall comply with all applicable laws relating to due diligence obligations along the supply chain.

## COMPLAINT MECHANISMS

The business partner and its employees and other rights holders are encouraged to report violations of this Code of Conduct to our internal complaints office via e-mail [humanrights@welton.co.uk](mailto:humanrights@welton.co.uk).

Business partners shall support all investigations into suspected violations. In addition, business partners should provide grievance mechanisms or support the applicable mechanisms in accordance with their own due diligence obligations.

## COMPLIANCE WITH THE CODE OF CONDUCT

Welton Bibby & Baron considers the provisions of this Code of Conduct to be essential to the business relationship between Welton Bibby & Baron and the business partner. In the event of material breaches by the business partner, Welton Bibby & Baron reserves the right to terminate the business relationship subject to applicable laws.

The business partner shall support Welton Bibby & Baron in implementing the due diligence processes on a risk-based basis. Welton Bibby & Baron reserves the right to review compliance with the Code to an appropriate extent. Audits are scheduled during business hours and agreed in advance with the business partner. Where necessary, the business partner shall take part in training courses proposed by Welton Bibby & Baron to ensure compliance with all laws, directives and regulations mentioned.

We hereby confirm that we share, respect, comply with and apply the values of the Code of Conduct.

Place / Date:		Signature / company stamp:	
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