

Record

Code of Conduct for Business Partners

ID number: A-EK-WER-037

# CODE OF CONDUCT FOR BUSINESS PARTNERS BETWEEN



**FLACHGLAS Wernberg GmbH**  
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92533 Wernberg-Koebnitz  
Managing director: Mr Michael Kettler  
District Court Amberg HR B 2597



**Glashandelsgesellschaft Profi mbH**  
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Managing director: Mr Michael Kettler  
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**Flachglas Nord-Ost GmbH**  
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39606 Osterburg  
Managing director: Mrs Anja Krost  
District Court Stendal HR B 8006



**Flachglas (Schweiz) AG**  
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4806 Wikon  
Managing director: Mr Beppino Candolo  
HR-Amt Kanton Luzern HR CH-100.3.007.041-2



**Flachglas Wikon AG**  
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## 1. PREAMBLE

### 1.1 Introduction

Commercial success and social responsibility are inseparable. Responsible and ethical behaviour in relation to employees, business partners, society and the environment are fundamental elements of the value system in place at FLACHGLAS Wernberg GmbH. Compliance with laws and regulations in our business dealings goes without saying.

The Code of Conduct therefore establishes minimum requirements binding on our business partners in their business relationship with FLACHGLAS Wernberg GmbH. We therefore expect from our business partners that they always comply with and implement the standards of the Code of Conduct.

We thank all business partners who jointly contribute with us towards responsible and ethical behaviour in the business world.

### 1.2 Scope of application

This Code of Conduct is binding on all business partners, suppliers, service providers and consultants.

## 2. INTEGRITY

### 2.1 Compliance with laws

**Our business partners comply with applicable laws at the local, national and international level.**

The need to comply with all applicable laws and regulations is self-evident for us. We also expect the same from our business partners. Only in this way can a trusting and long-term business relationship be secured.

All business partners are familiar with the basic laws, regulations and guidelines that are relevant for the work they perform for, in cooperation with or on behalf of FLACHGLAS Wernberg GmbH.

In certain countries, business areas or markets, regulations that are more stringent than those described in this Code of Conduct may apply. In such cases, the more stringent regulations are to be observed.

### 2.2 Protection against bribery and corruption

**Our business partners renounce all forms of corruption and bribery.**

Inappropriate influence on politicians or other decision-makers is forbidden. Our business partners must in particular refrain from all forms of bribery and corruption, whether in relation to holders of public office or in business dealings.

Our business partners shall provide gifts, whether in the form of invitations or in the context of advertising measures, donations and sponsoring measures, only within the legally admissible framework.

### 2.3 Fair competition

**Our business partners comply with applicable anti-cartel and competition law and avoid all conflicts of interest.**

Our business partners recognise the need for fair and unhindered competition as a basic principle of a free market economy. They refrain from all arrangements with competitors, suppliers, sales companies, dealers and customers that could impair free competition. This includes, for example, price coordination with competitors, the distribution of customers or sales territories between competitors, any anticompetitive boycotts and unlawful sharing with competitors of sensitive information affecting competition. Conflicts of interest with private affairs or activities, including those of family members or otherwise related or associated persons are to be avoided from the outset. If conflicts of interest arise despite all efforts to prevent them, they are to be treated and resolved with full transparency.

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#### 2.4 Protection of intellectual property

**Our business partners respect and protect intellectual property of all kinds.**

Intellectual property refers to all products of intellectual work, irrespective of their commercial value. This includes literary works, music, films, television programmes, graphic work and software. Intellectual property is protected by law (e.g. by copyright, trademark, design and patent laws) as business secrets or know-how.

Violations of protected intellectual property include, for example, the performance, distribution or exhibition of copyrighted works without the relevant authorisation, as well as the unauthorised duplication and distribution of copies of intellectual property, irrespective of this is in physical or digital form.

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Violations of protected intellectual property include, for example, the performance, distribution or exhibition of copyrighted works without the relevant authorisation, as well as the unauthorised duplication and distribution of copies of intellectual property, irrespective of this is in physical or digital form.

#### 2.5 Observance of data protection regulations

**Our business partners comply with applicable laws and regulations in regard to the collection, storage, processing and transfer of personal data and information.**

In the collection, storage, processing and transfer of personal data (e.g. name, address, telephone numbers, dates of birth, information on state of health, etc.) of employees, customers or other third parties, our business partners shall ensure the greatest care is taken and strict confidentiality is observed, as well as compliance with all applicable laws and regulations.

#### 2.6 Confidentiality and business information

**Our business partners protect confidential information from unauthorised disclosure and misuse.**

The business partner shall also ensure that confidential information and data is kept in safe custody, is not disclosed to or made available to any unauthorised parties and is used exclusively for the agreed commercial purposes.

Discussions regarding confidential information in public and on social media or the unauthorised disclosure of information relating to the company or its customers to any third party, e.g. media or competitors, represent a violation of confidentiality and could constitute breaches of anti-cartel law.

## 3. EMPLOYEES

### 3.1 Human rights

**Our business partners respect and support universally recognised human rights and ensure that they are not involved in any way in breaches of human rights.**

Our business partners acknowledge and affirm the principles of the General Declaration of Human Rights, the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the core labour standards of the ILO.

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#### **3.2 Prohibition of forced and child labour**

**Every form of forced and child labour is prohibited for our business partners.**

Our business partners shall not tolerate any child labour within the meaning of Conventions 138 and 182 of the ILO and national statutes. The minimum age of a child or adolescents for employment or work may not be below the age in which compulsory schooling ends in the country in which the business partner is engaged and under no circumstances under the age of 15 years.

Forced labour, i.e. every work performed by a person against his or her will and under threat of punishment and any modern form slavery and human trafficking shall not be tolerated by our business partners.

#### **3.2 Prohibition of forced and child labour**

**Every form of forced and child labour is prohibited for our business partners.**

#### **3.3 Labour laws**

**Our business partners comply with statutory regulations on fair working conditions and shall allow their employees to speak openly and without fear of reprisal on any matters that concern them.**

Statutory regulations on ensuring fair and safe working conditions, including regulations on wages, working hours and on protection of privacy shall be observed by our business partners.

Our business partners shall also observe all rights to freedom of association and collective bargaining in compliance with applicable laws and regulations.

Intimidation attempts and reprisals against employees who in good faith report actual or suspected misconduct must not be tolerated by our business partners. Our business partners shall also give their employees an opportunity to report potential compliance infringements confidentially.

#### **3.4 Prohibition of discrimination and harassment**

**Our business partners guarantee a working environment that is free from all discrimination.**

Our business partners shall tolerate no discriminatory behaviour towards their employees or job applicants on the basis of ethnic origins, nationality, gender, pregnancy or parenthood, marital status, age, physical handicaps, religion or world view, sexual orientation or for any other reasons covered by anti-discrimination law.

Our business partners ensure respectful and dignified treatment of their employees, free of all harassment, mobbing or intimidation.

#### **3.5 Compliance with immigration law and immigration policy**

The business partners shall comply with all applicable laws and regulations regarding work permits in the country in which it is active and shall take the necessary measures to ensure that no workers without the due authorisation and permits are employed.

#### **3.6 Remuneration**

The business partner pays suitable remuneration, guarantees the statutory minimum wage and observes the applicable regulations regarding maximum working hours.

#### **3.7 Health and safety**

**Our business partners guarantee a healthy and safe workplace.**

Our business partners guarantee a healthy and safe work environment for their employees by complying with all relevant laws and regulations on health and safety at the workplace.

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## 4. ENVIRONMENT

Environment and climate protection and the responsible use of natural resources form a significant part of the responsibility of our business partners towards the environment and society.

Our business partners comply with all applicable regulations on environment protection, in particular industrial and product-related environment protection measures. FLACHGLAS Wernberg GmbH expects that its suppliers always use and procure natural resources responsibly.

## 5. IMPLEMENTATION

### 5.1 Compliance

**Our business partners guarantee implementation and compliance with the Code of Conduct in their contractual relationship with FLACHGLAS Wernberg GmbH.**

To fulfil this obligation, our business partners shall communicate the values and principles of the Code of Conduct to all their employees assigned to work for FLACHGLAS Wernberg GmbH and shall ensure compliance.

FLACHGLAS Wernberg GmbH reserves the right to verify and review compliance with the Code of Conduct.

### 5.2 Supply Chain Compliance

**Our business partners shall ensure that their own business partners employed for or on behalf of FLACHGLAS Wernberg GmbH are also familiarised with and comply with the minimum requirements of the Code of Conduct.**

Because the minimum principles of the Code of Conduct are to be observed along the entire value added process, our business partners shall notify all third parties that it involves in work for FLACHGLAS Wernberg GmbH (e.g. subcontractors, consultants) of the Code of Conduct and shall promote compliance in their contractual relationship with FLACHGLAS Wernberg GmbH.

### 5.3 Violations of the Code of Conduct

**Any violations of the Code of Conduct can lead to suitable measures being taken by FLACHGLAS Wernberg GmbH.**

The Code of Conduct represents a constituent part of all contractual arrangements with business partners in the meaning of number 1.2 of this document.

If there is any suspicion of a violation of the Code of Conduct, the business partner shall support FLACHGLAS Wernberg GmbH in investigating the matter in question.

If a violation against the Code of Conduct is established, FLACHGLAS Wernberg GmbH reserves the right to take appropriate measures depending on the severity of the violation. This includes in particular, but not exclusively, the demand that the violation and its consequences be remedied immediately, a claim for damage compensation or a cancellation of the contract. In the event of a more serious breach of the Code of Conduct, FLACHGLAS Wernberg GmbH reserves the right to extraordinary termination of the contract.

## 6. CONTACT PERSON

Reports of any violations or any question and suggestions are to be addressed by e-mail to: [einkauf@flachglas.de](mailto:einkauf@flachglas.de)

Flachglas Group

Supplier

place, date

place, date

name (printed characters)

name (printed characters)

signature

signature