



**BARTELS – LANGNESS**

# Code of Conduct

(for Business Partners)

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## 1 Changes

Version	Date	Changes	Changed by
1.0	11.01.2023	Creation of the Code of Conduct	Anke Richly
1.1	24.11.2023	Chapter added „Responsibility for Consumer Interests, Products and Services“	Anke Richly
1.2	01.12.2023	Chapter added „Environmental Protection“	Anke Richly
1.3	21.03.2024	Document name changed from “Code of Conduct (for Suppliers)” to “Code of Conduct (for Business Partners)”	Anke Richly
1.4	18.02.2026	Updating of the entire document in accordance with RTG specifications:  Wording from a “we” perspective; Additions to the chapters “Supply Chain Due Diligence Act,” “Preservation of natural resources,” “Treatment and discharge of industrial wastewater,” “Handling air emissions,” “Handling waste and hazardous substances,” “Reducing the consumption of raw materials and natural resources,” “Handling energy consumption/efficiency”; Revision of various existing chapters.	Eike Sundermeyer

## 2 Preamble

This Code of Conduct for ensuring social and environmental standards in the supply chain represents the value base that forms a binding framework for the Bartels–Langness Group of Companies and its suppliers.

We, Bartels–Langness Group, ensure that minimum social and environmental standards are implemented by us and in our business relations. Our Code of Conduct combines applicable legal and operational regulations. Business partners recognize this Code of Conduct as binding for them.

Insofar as rules of conduct for individual areas of activity or companies are laid down in separate guidelines, these guidelines apply without restriction alongside our Code of Conduct. In cases of doubt, the stricter rule is to be observed.

## 3 Prohibition of corruption and bribery

We do not tolerate any form of corruption, bribery or extortion. We strictly separate private interests from business interests, thereby avoiding conflicts of interests or disadvantages for us and our contractual partners. Business relationships and contacts may therefore not be used for personal gain nor for the benefit of third parties.

## 4 Fair competition

We select our contractual partners solely on the basis of quality, price, and suitability of performance. Agreements or exchanges of information on prices, delivery relationships, and their conditions from a competitive perspective are not permitted.

## 5 Antitrust law and competition

We undertake to conduct business in strict compliance with applicable antitrust and competition law. This includes the requirement that goods and services offered to us are free of anti-competitive agreements, such as price agreements with competitors.

## 6 Safe and high-quality products and services

In order to eliminate the risk of fraud and to ensure that production complies with the agreed quality and safety standards, we require our business partners to ensure that they operate and maintain an effective quality management system. We expect the responsible and efficient use of natural resources (e.g., emissions, soil, air, water, and oceans) in production and throughout the entire value chain.

## 7 Responsibility for consumer interests, products and services

The Bartels-Langness Group of Companies and its contractual partners comply with the applicable legal provisions and International Labour Organization (ILO) and UN conventions for the products and services offered in our business units. In the event of conflicting regulations, those that offer the most comprehensive protection for employees and the environment shall apply.

## 8 No violation of human rights

We comply with internationally defined human rights as defined by the ILO and do not participate in human rights violations.

## 9 Supply Chain Due Diligence Act

We expect our business partners who fall within the scope of the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz-LkSG) to comply with all obligations arising from the LkSG and to continuously educate themselves on the subject through training. We expect our business partners, who do not fall within the scope of the LkSG to provide us with all information and documents to a reasonable extent and to support us in implementing the preventive and remedial measures necessary to enable us to fulfill our obligations under the LkSG. We also expect them to protect complainants within their sphere of influence from discrimination or punishment for filing a complaint in good faith.

## 10 Prohibition of child labour

We firmly reject child labour. Child labor must not be used at any stage of production. Suppliers are required to comply with the recommendation in the ILO conventions on the minimum age for employment of children. According to this, the age should not be lower than the age at which compulsory schooling ends under the law of the place of employment and in any case not below 15 years. If children are found

at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. Young workers under the age of 18 may not be employed in work that is harmful to the health, safety, or morals of children. Special protective regulations must be observed.

## **11 Prohibition of forced labour**

We reject forced labor, slave labor, or any form of comparable labor. No one may be forced to work under threat of punishment or be employed against their will. Employees must be able to terminate their employment or working relationship at any time. The commissioning or use of security forces is prohibited if individuals are treated in an inhumane or degrading manner, injured, or if freedom of association is impaired during their deployment.

## **12 Fair treatment**

We condemn any form of physical abuse and threats thereof, sexual and other psychological and physical harassment.

## **13 Prohibition of discrimination**

We do not tolerate discrimination in employment and occupation on grounds such as gender, skin color, religion, ethnic origin, age, nationality, marital status, sexual orientation, disability, social background, or political opinion. The personal dignity, privacy, and personal rights of each individual are respected.

## **14 Working hours and remuneration**

We comply with the maximum working hours applicable under national law or customary in the industry and expect our contractual partners to do the same. Total remuneration should cover living expenses and correspond to at least the respective national minimum wages. Payment is made regularly and at least once a month. Overtime pay must in all cases exceed the pay for regular hours. If the remuneration is not sufficient to cover the costs of normal living expenses and to build up a minimum level of savings, the remuneration must be increased accordingly. Employees must be granted all benefits required by law. Wage deductions as punitive measures are not permitted. It must be ensured that employees receive clear, detailed, and regular written information about the composition of their remuneration.

The maximum regular working hours are governed by legal provisions. It must be ensured that employees do not have to work more than 48 regular hours per week. Exceptions specified by the ILO are possible. The use of overtime should remain an exception, be voluntary, and be compensated separately or compensated with time off.

## **15 Organizational and collective bargaining**

We respect the right of employees to form independent and free employee organizations and to conduct free negotiations on collective agreements and employee rights. Employees must not be restricted or discriminated against for exercising these rights. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of employees for the purpose of collective bargaining must be provided. Employees must not be discriminated against on the basis of establishing, joining, or being a member of such an organization.

Employee representatives must be granted free access to their colleagues' workplaces to ensure that they can exercise their rights in a lawful and peaceful manner.

## **16 Safety and health at work**

We ensure a safe and hygienic working environment and comply with the applicable laws and standards on occupational health and safety. In particular, young people should not be exposed to dangerous, unsafe, or unhealthy conditions that could jeopardize their development. By establishing and applying appropriate occupational safety systems, necessary precautions are taken against accidents and damage to health that may arise in connection with the work. Excessive physical or mental fatigue must be prevented by appropriate measures. Employees are provided with access to sufficient drinking water and clean sanitary facilities. Employees should receive regular training on health and safety in the workplace. We also expect this from our contractual partners.

## **17 Preservation of natural resources**

We do not take land, forests, or water resources whose use secures people's livelihoods in violation of legitimate rights. Harmful soil changes, water and air pollution, noise emissions, and excessive water consumption must be avoided if they harm people's health, significantly impair the natural basis for food production, or prevent people from accessing clean drinking water or sanitary facilities.

## **18 Environmental protection**

We are committed to protecting resources throughout the supply chain and are constantly working to increase the proportion of sustainably sourced raw materials in our products and minimise negative environmental and social impacts during manufacturing. Business activities – including those of contractual partners – are reviewed for significant environmental impacts and effective policies and procedures are established to minimise them. Measures shall be implemented and documented that adequately reduce adverse impacts on the community, natural resources and the environment as a whole. All obligations arising from the EU Deforestation Regulation (Regulation 2023/1115) must also be complied with.

## **19 Treatment and discharge of industrial wastewater**

Wastewater from operational processes, manufacturing processes, and sanitary facilities must be classified, monitored, checked, and treated if necessary, before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

## **20 Handling of air emissions**

General emissions from operational processes (air and noise emissions) and greenhouse gas emissions must be classified, routinely monitored, checked, and treated if necessary before they are released. In addition, exhaust gas purification systems must be monitored, and we are required to find economical solutions to minimize any emissions.

## **21 Handling waste and hazardous substances**

We follow a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste in the Basel Convention of March 22, 1989, as amended, must be observed. Chemicals or other materials that pose a hazard when released into the environment must be identified and handled in such a way that safety is ensured during handling, transport, storage, use, recycling or reuse, and disposal. Mercury must be used in accordance with the prohibitions of the Minamata Convention of October 10, 2013, and persistent organic pollutants in accordance with the Stockholm Convention of May 23, 2001, in its current version.

## 22 Reducing the consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, must be reduced or avoided. This is done either directly at the point of origin or through processes and measures such as changing production and maintenance processes or company procedures, using alternative materials, saving resources, recycling, or reusing materials.

## 23 Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Cost-effective solutions must be found to improve energy efficiency and minimize energy consumption.

## 24 Data protection

We ensure adequate protection of the privacy rights of our employees and their personal data, as well as compliance with legal provisions on data protection and official regulations.

## 25 Operational implementation

Suppliers operate management systems that enable the prescribed environmental and social standards to be implemented, both in their own plants and in those of their suppliers. Compliance is monitored. Employees are informed about these required standards and have access to them. A company reporting system for violations is set up, and employees who report violations may not be disciplined or disadvantaged as a result. The implementation of the environmental and social standards can be monitored at any time either by Bartels-Langness or by a contracted auditing institute. The costs of such monitoring shall be borne by the one who carries out or commissions the monitoring. In doing so, the applicable regulations for the protection of data and trade secrets shall be observed.

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Supplier (Stamp)

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Date

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Signature