



# Code of Conduct



# Code of Conduct

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## Preamble

We are a family-run company. Our core competence is the production of bathroom and kitchen products.

Honesty and transparency define our actions. Trust and fairness towards our business partners and employees are our highest priorities.

Customer satisfaction is our top priority. Therefore, we strive to exceed customer expectations.

We value and respect all employees and actively promote equal opportunities at every level.

Transparent communication and collaboration foster a respectful, productive workplace where everyone plays a role in collective success.

Our products offer an optimal price-performance ratio and are manufactured at our own locations and production facilities worldwide.

We operate successfully in international markets, leveraging our strong values and quality standards to gain market share in new regions.

Efficiency and accountability form the cornerstone of our outstanding success.

Social responsibility is at the core of our values. Through our active engagement, we make a meaningful contribution to the greater good.

We take a long-term approach and are committed to acting responsibly and sustainably.

Our actions are consistent with the applicable legal framework and a responsible ethical understanding, as set out in this joint Code of Conduct.

A handwritten signature in black ink, appearing to read 'Björn Schütte'.

Björn Schütte  
Managing Director

# 1. Fundamental principle

This Code of Conduct is based on a common fundamental principle of socially responsible corporate governance in accordance with the following guidelines.

We, the Schütte Group GmbH and all business units of the company, assume responsibility within the framework of our respective possibilities and scope of action by considering the consequences of our business decisions and actions in legal, economic, technological as well as social and ecological terms. By doing so, we contribute to the social and economic development of the countries and regions where we operate.

Our actions are in accordance with the relevant legal regulations. We are guided by ethical values

and principles, in particular integrity, honesty and respect for human dignity, as set out in the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organisation's Core Labour Standards and the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct sets out the basic principles that we expect our employees to follow worldwide. The content applies to all of our offices and business units.

We expect the same fundamental principle from all of our business partners. Rights in favour of third parties are not to be established.

# 2. Compliance with laws

It goes without saying that we comply with the applicable laws and other legal requirements of the countries in which we operate. We act in accordance with the principles of this Code of Conduct where local laws and regulations are less

restrictive. Local law shall prevail where there is a direct conflict between mandatory local law and the principles contained in this Code. However, we endeavour to comply with the contents of this Code of Conduct.

# 3. Integrity and compliance

We have implemented appropriate Compliance<sup>1</sup> measures, meaning that the following topics are sufficiently covered:

## 3.1 Corruption

We do not tolerate corruption, bribery or extortion, as they prevent fair competition. In our business relationships, we do not promise, offer, grant, demand or accept inducements that are intended to influence, or could give the appearance of influencing, business decisions, nor do we allow ourselves to be promised such inducements. When dealing with persons subject to special criminal and liability rules (e.g. public officials), a particularly strict standard must be applied.

## 3.2 Fair competition

We act in accordance with national and international competition and antitrust laws and do not engage in price fixing, market sharing or customer, market or supply allocation.

## 3.3 Money laundering prevention

Money laundering is the process by which illegally obtained money or assets are smuggled into the legitimate financial and economic system. We fulfil our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

### 3.4 Protection of information and intellectual property

We protect confidential information and respect intellectual property; technology and know-how transfers must be conducted in a manner that protects intellectual property rights, customer information, trade secrets and non-public information. We comply with applicable laws protecting trade secrets and treat our business partners' confidential information accordingly.

### 3.5 Data privacy

We process, store and protect personal data in compliance with legal regulations. Personal data is collected confidentially, only for legitimate, predetermined purposes and in a transparent manner. We only process personal data if it is

protected against loss, alteration and unauthorised use or disclosure using appropriate technical and organisational measures.

### 3.6 Export control

We undertake to comply with the relevant export control legislation - in particular licensing requirements, export prohibitions and prohibitions on providing assistance - when transferring and exporting our goods.

### 3.7 Avoidance of conflicts of interest

We avoid conflicts of interest, both internal and external, that could have an undue influence on business relationships. If this is not successful, we disclose these conflicts.

## 4. Health and safety

We will protect the health of our employees by taking appropriate health and safety measures (e.g. implementing an occupational health and safety management system) that adequately address the following issues:

- Compliance with applicable laws and adherence to international health and safety standards<sup>2</sup>;
- Suitable workplace design, safety regulations and provision of suitable personal protective equipment;

- Implementation of preventive controls, emergency measures, an accident reporting system and other suitable measures for continuous improvement;
- Enabling access to drinking water in sufficient quantities and access to clean sanitary facilities for employees.

We make sure that all of our employees are properly instructed.

## 5. Remuneration and working hours

Remuneration is based on applicable laws and any existing binding collective agreements, supplemented by the relevant national minimum wage legislation. Employees are clearly, fully and regularly informed about how their pay works. We comply with applicable laws and (international) labour standards<sup>3</sup> regarding maximum working hours and ensure that:

- the working hours, including overtime, do not exceed the respective legally permissible maximum limits;
- the weekly working hours, including overtime, does not exceed 60 hours, even in exceptional cases, in the absence of such provisions;
- employees have at least one full day off per calendar week.

## 6. Compliance with human rights

We respect and support the observance of internationally recognised human rights and

- respect the personal dignity, privacy and personal rights of each individual;
- protect and fulfil the right to freedom of opinion and expression;
- do not tolerate unacceptable treatment of employees, such as physical or psychological abuse, sexual or personal harassment or discrimination.

### 6.1 Prohibition of child labour

We do not tolerate child labour<sup>4</sup>. We do not employ anyone who is not at least 15 years old and we ask for proof of age. In countries that fall under the exception for developing countries in accordance with ILO Convention No. 138, the minimum age can be reduced to 14 years. We do not hire employees for hazardous work who are not at least 18 years of age in accordance with ILO Convention No. 182.

### 6.2 Prohibition of forced labour

Forced or compulsory labour, modern slavery or

similar practices that deprive people of their liberty are prohibited.<sup>5</sup> All work must be voluntary and there must be the possibility of terminating the employment relationship.

### 6.3 Freedom of association and collective bargaining

We respect the rights of employees to freedom of association, assembly and collective bargaining<sup>6</sup> to the extent permitted by law and possible in the countries in which we operate. If this is not permissible, we seek appropriate compromises for our employees.

### 6.4 Promotion of diversity and equal opportunities

We promote equal opportunities and do not tolerate discrimination.<sup>7</sup> We treat all people equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

## 7. Environment, energy and climate protection

We act in accordance with applicable laws and international standards<sup>8</sup> to minimise negative impacts on the environment and to continuously improve our environmental and climate protection activities. All employees are made aware of environmental issues and are provided with the necessary training and courses.

We have taken appropriate environmental protection measures (e.g. the implementation of an operational environmental protection management system) that adequately cover the following topics:

- Objectives, definition and implementation of measures and their continuous improvement;
- Environmental aspects such as reducing CO<sub>2</sub> emissions, increasing energy efficiency and using renewable energy, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and disposing of it properly, and handling hazardous substances in a way that is safe for people and the environment.

## 8. Handling conflict minerals

To prevent human rights abuses, corruption and the funding of armed groups, we take due care to avoid the use of conflict minerals in our products.

## 9. Supply chain

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of this Code of Conduct in their supply chains.

We reserve the right to review the application of this Code of Conduct with our suppliers on a systematic basis and on an ad hoc basis. This can take the

form of questionnaires, assessments or audits, for example.

In the event of any doubt as to compliance with this Code of Conduct, the Supplier is encouraged to take appropriate action and report the matter to the appropriate contact within our Company. If necessary, the cooperation will be terminated.

## 10. Consumer interests

Where consumer interests are affected, we comply with consumer protection regulations and appropriate sales, marketing and information practices. Particularly vulnerable groups (e.g. young people or pregnant women) receive increased attention.

## 11. Implementation and enforcement

We make appropriate and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees are made aware of the contents of the Code of Conduct and receive training on relevant topics as required. Violations against the Code of Conduct will not be tolerated and may lead to consequences under labour law.

### 11.1 Communication

We communicate the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other interest and stakeholder groups in an open and dialogue-oriented manner.

### 11.2 Notification of violations

We offer our employees and business partners access to a protected mechanism to report possible violations of the principles of this Code of Conduct confidentially.

If you have any information, please contact the following person/office directly or anonymously:

**Compliance Schütte Group**

[compliance@fjschuette.de](mailto:compliance@fjschuette.de)

**Data Protection Officer**

[privacy@fjschuette.de](mailto:privacy@fjschuette.de)

<sup>1</sup>The term Compliance refers to the observance of legal requirements, regulatory standards, voluntary commitments and internal guidelines.

<sup>2</sup>See ILO Labour and Social Standards (ILO Guidelines on Occupational Safety and Health); ILO Guidelines on Health and Safety at Work; SA 8000 Social Accountability or ISO 45001 Occupational Health and Safety Management System, etc.

<sup>3</sup>ILO-Convention No. 1 (Hours of Work (Industry) Convention), 1919)

<sup>4</sup>ILO-Conventionen No. 79, 138, 142 and 182

<sup>5</sup>ILO-Conventionen No. 29 and 105

<sup>6</sup>ILO-Conventionen No. 87, 135 and 154

<sup>7</sup>ILO-Conventionen No. 111

<sup>8</sup>ISO 14001 and Standards of the OECD Guiding Principles/COP21



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