

# Code of Conduct HB Protective Wear

English

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# CONTENT

CODE OF CONDUCT		2
1.	BASIC UNDERSTANDING OF SOCIALLY RESPONSIBLE CORPORATE MANAGEMENT Compliance with rules and regulations Contribution towards society Ethical economic activity and integrity Personal data, protection of confidential information and intellectual property	4
2.	RESPECT OF HUMAN RIGHTS	5
3.	EMPLOYMENT LAW AND WORKING CONDITIONS Freedom of association and right to collective bargaining Prohibition of forced labour Prohibition of child labour and protection of young employees Prohibition of discrimination in employment and occupation Working hours Wages Employment relationships Health and safety in the workplace Humane treatment	5
4.	<b>ENVIRONMENTAL PROTECTION</b> Protection of the environment and climate Animal welfare and species conservation	8
5.	CONSUMER INTERESTS	9
6.	COMMUNICATION	9
7.	IMPLEMENTATION AND ENFORCEMENT	9



Good means not merely not to do wrong, but rather not to desire to do wrong. Democritus

# **Code of Conduct**

We at HB Protective Wear are aware of our social responsibility. Alongside outstanding product quality and excellent customer service, HB Protective Wear stands for openness and thus for transparency. For us, a commitment to respecting human rights, accepting other cultures, saving energy, environmental protection, social engagement and combatting corruption means responsible corporate management and is rooted in our objectives. We take into account the direct and indirect effects of our business activities on society and the environment.

A fundamental requirement is to also preserve the ecosystem on Earth for future generations. We would like to achieve this by using resources carefully in line with the applicable environmental regulations.

The consequences of all corporate decisions are considered from an economic, social and environmental viewpoint. HB Protective Wear contributes towards the well-being and sustainable development of global society within the scope of an individual's possibilities. The same applies to business relationships within the textile chain. The generally valid values and principles are to be taken into account; this particularly applies to human dignity.

The basis of our Code of Conduct is the Universal Declaration of Human Rights, the ILO Conventions, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and selected United Nations conventions. In addition, our Code of Conduct is based on relevant, international agreements to protect the environment.

# **Our suppliers**

The implementation of social responsibility does not end with our employees on site. Instead, we also expect our suppliers to comply with the minimum requirements formulated in this Code of Conduct. We expect them to ensure that this Code of Conduct is complied with by them and by all of the subcontractors involved in production processes for HB items. We want to support and encourage them to not only achieve this, but to exceed it.

Our Code of Conduct in no way represents a replacement for national legislation; it is intended to be complementary. In the event of discrepancies between legal provisions and our requirements, the stricter requirement always applies.



# Inspections and measures

To verify compliance with the Code, audits will be carried out at regular intervals within the value creation chain. These can take place unannounced and are either carried out by HB Protective Wear employees or by another, independent third party. The audits also include inspecting the systems, business premises and records that confirm compliance with the standards.

If authorised auditors are denied such inspections or surveys, this is tantamount to a clear infringement and can lead to the immediate termination of the collaboration.

Our aim is to establish long-term partnerships with our suppliers. This is why, in the event of minor deviations from our requirements, they are given the opportunity to implement remedial measures within an appropriate period of time to prove themselves again. In the event of an infringement against our Code of Conduct or a discernible absence of a desire to change, we reserve the right to terminate the collaboration with the respective company without notice.

Klaus Berthold Business Graduate Owner

We ask that all masculine terms used in our Code of Conduct to improve legibility are understood to be gender-neutral. It is very important to us that no one feels excluded by the masculine terms used here.



# **Code of Conduct Principles**

1. Basic understanding of socially responsible corporate management

#### Compliance with rules and regulations

We comply with the rules and regulations of the respective countries in which we are economically active. We also expect this from our suppliers. We ensure compliance with the principles of the present Code of Conduct in our own actions (particularly in countries with a weakly developed state structure) and also encourage our business partners to do the same.

If existing national regulations conflict with the content of the Code or the national context makes it impossible to fulfil the responsibility to respect human rights without restriction, we will find ways to nevertheless uphold the principles of internationally recognised human rights and the content of the present Code of Conduct.

#### Contribution towards society

We see ourselves as part of the society in which we conduct our business activities. Through our business activities, we contribute towards the well-being, promotion and sustainable development of this society. We take into account the direct and indirect effects of our business activities on society and the environment, and strive to bring them into an appropriate balance of interests from an economic, social and environmental viewpoint. We respect and accept the different legal, societal, cultural and social backgrounds of the countries into which our value creation chains extend, and recognise their structures, customs and traditions. Where these conflict with the principles laid down here, we will enter into a dialogue with our business partners and work towards understanding and acceptance.

#### Ethical economic activity and integrity

We pursue legal business practices while observing fair competition, commercial intellectual property rights of third parties, and antitrust and competition law regulations. We reject all forms of corruption, extortion and bribery and promote principles of responsible corporate management such as transparency, accountability, responsibility, openness and integrity in a suitable manner. We also do not tolerate the offering and acceptance of benefits in any form to influence corporate actions and to secure oneself a competitive advantage. We act in accordance with the applicable import and export control regulations and abide by the legal requirements to prevent money laundering. Business partners are to be treated fairly, contracts are to be adhered to, insofar as the framework conditions do not fundamentally change. General ethical values and principles are to be respected; this particularly applies to human dignity and internationally recognised human rights.



#### Personal data, protection of confidential information and intellectual property

We respect the personal rights of our employees, business partners and customers and, when handling personal information, comply with the applicable legal and official requirements on the processing of personal data and information security. We carefully ensure that business secrets entrusted to us and other confidential information from our business partners and customers are protected appropriately from unauthorised acquisition, use and disclosure, although at least in accordance with the relevant legal provisions to protect business secrets. We respect the intellectual property of our business partners, customers and other third parties and ensure that sufficient precautions to protect the intellectual property rights are taken when transferring expertise and technologies.

## 2. Respect of human rights

Protecting human rights is the obligation of the respective states in which we are economically active. To support the obligation of the state to enforce human rights within its territory, we, as the company HB Protective Wear, respect human rights. In all of our business activities, we always strive to neither cause nor contribute towards human rights violations.

To fulfil the responsibility to respect human rights, we exercise due diligence in the field of human rights with regard to the risk of severe human rights impacts and the nature and context of the business activity. Due diligence should include procedures to determine, prevent, minimise and, if necessary, rectify potential negative impacts on human rights, and should extend to these negative impacts on human rights that we cause ourselves or to which we contribute or with which are directly associated with our business activities, our products or services as a result of our business relationships.

# 3. Employment law and working conditions

We observe the core labour standards of the International Labour Organization ILO and create a safe and humane working environment.

#### Freedom of association and right to collective bargaining

We respect the right of employees and employers to form organisations without prior approval and at their own discretion which aim to promote and protect the interests of the employees or the employers, to join these organisations and to choose their representatives freely. We respect the right of employees and employers to engage in collective bargaining regarding wages and working conditions. Employees may not be disadvantaged in relation to their employment due to their membership of labour organisations.

In countries in which the principles of freedom of association, the right to organise and collective bargaining are not upheld or the exercising of these rights is limited or prohibited, HB Protective Wear expects its suppliers to give their employees the



freedom to elect their own representative with whom they can engage in dialogue on workplace issues.

We respect the right of employees to make complaints without experiencing disadvantages of any kind as a result. These complaints are to be handled in a suitable procedure.

#### Prohibition of forced labour

The enforcement of labour through the threat of penalties of any kind is prohibited. Employees shall only be employed if they voluntarily make their labour available and the forms of employment comply with national laws and procedures. Any form of forced labour, bonded labour, servitude, imprisonment, slavery or practices similar to slavery, human trafficking or other involuntary labour and services is not accepted. Punishment, psychological and physical coercion are prohibited.

All employees must receive freely agreed labour contracts in a language they understand and which respect their legal and contractual rights before they are employed.

No identity documents or wages may be withheld from the employee upon conclusion of the contract. Employees retain control over their identity documents at all times. Direct or indirect measures that prevent employees from leaving the company or production site are prohibited.

If accommodation is provided, the freedom of movement of employees using this accommodation is guaranteed at all times.

The freedom of movement of employees must not be impaired by the employer.

The employer is responsible for paying the fees and charges associated with the employment.

#### Prohibition of child labour and protection of young employees

We are committed to the effective abolition of child labour. We observe the respective legal minimum age for admission to employment or work, which, in accordance with the provisions of the International Labour Organization ILO, may not be below the age at which compulsory schooling or below 15 years.

As part of the recruitment procedure, suitable mechanisms to determine age should prevent child labour. If we identify child labour, we initiate necessary remedial and social reintegration measures, which focus on the well-being and protection of the child.

HB Protective Wear only employs adolescents from the age of 16 years if the nature and the conditions of the work performed by them do not jeopardise the life, health and morals of the respective adolescents and they receive appropriate, relevant instruction or vocational training in the corresponding industry.



#### Prohibition of discrimination in employment and occupation

Any type of discrimination, exclusion or preference in hiring, payment, access to training programmes, promotion, termination or retirement due to race, background, religion or ideology, disability, gender, age, sexual orientation, membership of a trade union or political views is not tolerated. A working environment that enables inclusion and equal opportunities is promoted. Furthermore, the principle of equal pay for work of equal value by male and female employees should apply.

#### Working hours

Wages are not withheld and are paid regularly in a form suitable for the employees. Deductions from wages and salaries as a disciplinary measure are not permitted. Deductions from wages are only permitted within the legal or collectively agreed framework and must be reported. All national regulations on payments of health insurance, social security contributions and special benefits are complied with. Employees are regularly informed about the composition of their remuneration.

Every employee has the right to fair remuneration that is sufficient to cover their basic needs in terms of food, water, housing, mobility, education, healthcare and clothing and guarantees a freely disposable income. We ensure that HB Protective Wear employees receive such fair remuneration and encourage our business partners to follow suit.

If the minimum wage is not sufficient to meet an employee's basic needs, the wage paid should be significantly higher than the statutory minimum wage. State or collectively agreed minimum wages must not be undercut. We note that in countries without a collectively agreed or statutory wage framework, wages for regular full-time work should be sufficient to fulfil the basic needs of workers in accordance with ILO Convention No. 131. If an existence in keeping with human dignity cannot be secured alone, supplementary state benefits and other social protection measures may be necessary.

#### Wages

State or collectively agreed minimum wages may not be undercut. In countries without collectively agreed or statutory wage parameters, we note that the wages for regular full-time work should be sufficient to meet the employee's basic needs. At the same time, we know that HB Protective Wear alone cannot secure an existence in keeping with human dignity, but that supplementary state benefits and other social protection measures may be necessary.

Wages are not withheld and are disbursed regularly in a form that is suitable for the employee. Wage deductions are only permitted within the statutory or collectively agreed framework and are to be indicated. The employees are regularly informed about the composition of their remuneration.



#### Employment relationships

The rules of national employment law are to be observed. The employee should be provided with understandable information about the basic working conditions, including the working hours, remuneration, and payment and clearing terms. We protect the right of employees to end the employment relationship while complying with the respective relevant period of notice. We also strive to promote vocational qualifications for employees.

#### Health and safety in the workplace

Taking into account national requirements, appropriate measures are implemented to ensure health and safety in the workplace in order to prevent occupational accidents during the activities and protect the health of all employees.

Applicable local regulations on safety at work, occupational health and safety, building security and fire prevention are observed to reduce the risk of accidents and occupational illnesses to a minimum. To this end, a risk assessment of workplaces is conducted regularly. As part of implementing suitable danger prevention and precautionary measures, the employee is provided with suitable personal protective equipment where necessary and appropriate. In immediate hazard situations, the employees have the right and obligation to leave their workplace immediately and without permission. People in need, such as adolescent employees, young mothers, pregnant women and people with disabilities, should be given special protection.

#### Humane treatment

We treat our employees with dignity and respect. Any form of unworthy treatment, abuse, harassment and intimidation or unlawful penalties against employees is prohibited and systematically refused. Disciplinary measures are set down in writing and in a form that is understandable for the employees.

## 4. Environmental protection

We accept our environmental responsibility by fulfilling the applicable laws, provisions and administrative practices to protect people, the environment and climate in the countries in which we operate. We generally conduct our business activities in such a way that they contribute towards the general goal of sustainable development and make efforts to continuously improve the impacts of our business activities on the environment and climate. In the long term, we are committed to the goal of a climateneutral future.

#### Protection of the environment and climate

We have taken suitable measures that are oriented towards statutory and internationally recognised standards and cover the following topics, among others:

 Correct and responsible handling of hazardous materials and other chemicals as well as waste, including disposal;



- Efforts to reduce or prevent waste and minimise emissions from business operations (e.g. wastewater, exhaust air, noise, greenhouse gases);
- Conservation of natural resources, such as with measures to save water, chemicals and other raw materials;
- Promotion of the use of recycle-friendly and other climate- and environmentally friendly technologies, procedures, raw materials and products;
- Efforts to increase energy efficiency and the proportion of green or renewable energies in the consumption of energy at our company locations.

#### Animal welfare and species conservation

We observe the principles to protect animals and biodiversity and orient our business activities towards these accordingly. The keeping and use of animals must comply with the applicable statutory animal welfare requirements and be appropriate to the species. The Washington Convention is to be observed.

# 5. Consumer interests

We implement suitable measures to guarantee the quality of the products we offer. We ensure that our products correspond to all statutory regulations with regard to the health and safety of consumers and are safe and harmless to health for the respective intended use. We also ensure that our products or services correspond to the respective relevant statutory consumer protection provisions.

HB Protective Wear also takes the interests of consumers into account in information and distribution measures by applying fair business, marketing and advertising practices and promoting consumer education. We are particularly mindful of the interests of children, the elderly, people with disabilities and other consumer groups requiring protection.

## 6. Communication

We communicate the content of the Code of Conduct to employees, contractual partners and, if applicable, third parties. It should be understandable for the contractual partner that compliance with the Code of Conduct is fundamentally ensured. However, the sharing of operational or business secrets, competition-related information or other information worthy of protection is excluded from this for legal reasons.

# 7. Implementation and enforcement

We observe the present Code of Conduct in our own actions. We encourage our business partners to apply the Code of Conduct correspondingly. We help our business partners to arrange their supply chain in such a way that human and employee rights are respected and working conditions are continuously improved. To ensure compliance with the Code of Conduct, we have established suitable measures and processes and document their implementation within the company in a suitable



manner. The company management obtains information at regular intervals regarding the implementation and work of the responsible bodies and persons.

In terms of good corporate governance, we anchor the principles of responsible corporate management stated in the Code in our strategic and operational management system.

#### Information

We undertake to prominently display the Code of Conduct for employees. In addition, the content must also be explained verbally in an easily understandable manner. New employees must be made aware of the Code of Conduct during their induction and also receive a verbal explanation. We also expect this procedure, particularly the displaying of the information in the respective applicable national language, from our suppliers.

#### Complaints

In the event of infringements against the requirements listed above, please direct your complaint to Ms. Greta Hansen: Telephone +49 2639 8309 419 or ghansen@hb-online.com

Klaus Berthold Business Graduate Owner