



## CODE OF CONDUCT FOR BUSINESS PARTNERS

This Code of Conduct sets out fundamental ethical and behavioral principles and applies to all business partners who collaborate with the Vorwerk Group.

### Preamble

This Code of Conduct contains the requirements and principles that all business partners must comply with as part of their contractual obligations within the framework of their collaboration with Vorwerk. The objective of these requirements and principles is to ensure compliance with human rights and environmental standards along the entire value chain through ecologically, economically and socially responsible behavior. The aim is to improve people's quality of life and to maintain the standard of living for the current as well as future generations. Our business partners contribute significantly to our success. For this reason, we also expect them to conduct all business in an ethical and legally sound manner.

This Code of Conduct is not immutable, but is subject to further development and adaptation in line with continuously changing legal and economic conditions.

As a signatory of the UN Global Compact we make particular reference to their ten universal principles as well as to other international frameworks in the social and environmental standards described here.<sup>1</sup>

In light of this, we oblige our business partners to adhere to the following principles, as we, the Vorwerk Group do ourselves, and to provide their employees with regular information about them and training as appropriate. Furthermore, we expect our business partners to communicate the requirements defined in this Code of Conduct to their suppliers and other third parties involved in fulfilling their contractual obligations.

### Observance of laws and social norms

We, as the Vorwerk Group, comply with locally applicable laws and are committed to the values

formulated in this Code of Conduct. We expect the same from our business partners.

### Human rights and social standards

Based on the United Nations Guiding Principles on Business and Human Rights, Vorwerk expects from business partners strict observation and compliance with internationally applicable human rights.<sup>2</sup>

#### Child labor

Our business partners must assure that all persons working for their company have reached the minimum age required to perform the work in accordance with ILO Convention No. 138 and that child labor is prevented and eliminated in accordance with ILO Convention No. 182.

#### Forced labor and slavery

Our business partners must adhere to the prohibition of any form of forced labor and slavery that is performed, for example, under threat of punishment and against the free will of the persons. This includes, in particular, debt bondage and human trafficking.

#### Discrimination

Our business partners must commit to preventing any unlawful discrimination against people on the basis of national and ethnic origin, social origin, health status, sexual orientation, age, gender, political opinion, religion or belief. Here, the principle of equal pay for equal work and work of equal value also applies.

#### Adequate working conditions

Our business partners must abide by the ILO Principles. This involves, among other things, ensuring fair working conditions, such as appropriate remuneration, observing working/rest times, offering reasonable annual leave

<sup>1</sup> International Human Rights Charter, UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, ILO Declaration on Fundamental Principles and Rights at Work.

<sup>2</sup> This concerns the requirements of §§2, 6, 7, 10, 11 of the German Supply Chain Due Diligance Act (LkSG).



entitlement, and adequate social benefits for employees. Furthermore, our business partners must grant their employees the freedom of association as well as the right to collective bargaining.

#### Occupational health and safety

Our business partners must comply with all legal requirements and take any necessary measures to prevent adverse health effects for their employees in the workplace. We expect our business partners to ensure occupational health and safety, e.g., through a management system according to ISO 45001.

#### Eviction and dispossession

Our business partners must comply with the prohibition of unlawful eviction and dispossession of land, forests and waters through construction, acquisition or other use.

#### Use of private or public security forces

Our business partners must prohibit any deployment of private or public security forces to protect a business project if this presents a risk of torture or other ill-treatment due to lack of instruction, or any restriction of the freedom of association or coalition.

### **Environmental standards**

Our business partners share responsibility for the protection of the environment and the careful use of resources. Accordingly, we expect them to reduce or avoid any negative impact on the environment and to protect natural resources through an appropriate environmental and energy management system, e.g., certified according to ISO 14001 or EMAS.

#### Climate protection

We expect our business partners to protect the climate and take appropriate measures to reduce their carbon footprint as far as possible in their operations. They must balance their direct and indirect carbon emissions, reducing them in particular through measures to improve energy efficiency and the use and generation of renewable energies.

#### Water consumption and quality

We expect our business partners to use water responsibly and to work towards long-term reduction in their water consumption. Access to

clean drinking water and sanitary facilities must be ensured, especially in areas of water scarcity. Compliance with the legal regulations regarding waste water quality is essential.

#### Soil and air quality

In addition to the applicable laws and requirements of local authorities, our business partners must undertake to comply with the prohibition of causing harmful soil contamination, air pollution and harmful noise emissions.

#### Materials and waste disposal

Our business partners must collect, store and dispose of their waste in accordance with the locally applicable regulations. They must strive to recycle and reuse as much waste material as possible.

#### Use of risky raw materials

Our business partners must ensure that risky raw materials and chemicals are handled responsibly and in accordance with the law. This includes handling mercury and mercury compounds correctly, as according to the Minamata Convention, the ban on the production and use of chemicals containing persistent organic pollutants as defined in the Stockholm Convention, and the ban on the export of hazardous wastes according to the Basel Convention.

#### Conflict minerals

Our business partners must not source or process minerals from conflict regions and thus not contribute to the financing of armed groups in the producing countries. This applies in particular to products containing gold, tungsten, tantalum, tin and their ores.<sup>3</sup>

#### Substance law requirements

Our business partners must comply with any substance law requirements associated with the delivered product.<sup>4</sup>

### **Business relations**

#### Upstream supply chains

We expect our business partners to communicate the requirements of this Code of Conduct to any suppliers they commission, to obtain information from these about their social and environmental standards, and to review this information regularly.<sup>5</sup>

<sup>3</sup> EU Conflict Minerals Regulation ((EU) 2017/821).

<sup>4</sup> This includes requirements of REACH Regulation No. 1907/2006 of 18.12.2006 and RoHS Directive 2011/65/EU, 2015/863/EU.

<sup>5</sup> This concerns the requirements of §3 (1) LkSG.



### Conflicts of interest

We expect business partners to base their decisions on reasonable economic considerations in compliance with applicable laws and norms and to avoid conflicts of interest that could influence their commercial relationship with Vorwerk. Should a conflict of interest become apparent, Vorwerk must be informed immediately and the conflict must be resolved as quickly as possible by taking appropriate measures.

### Behavior on the market and competition

Our business partners must refrain from any conduct that violates the rules of fair competition or antitrust law. Our business partners must engage in fair competition and ensure compliance with all associated legal regulations. This applies to all interactions with suppliers and service providers, customers and competitors. They must refrain, in particular, from fixing prices, production capacities or market allocation, or exchanging information between competitors that could be used to coordinate market behavior.

### Corruption

Our business partners must comply with applicable anti-corruption laws and ensure that their employees, as well as suppliers, do not offer anything of value for the purpose of obtaining contracts or favors. Furthermore, they must ensure that nothing of value is granted, offered or promised to any government official or counterparty in the private sector for the purpose of unlawfully influencing an official act or to obtain any other improper advantage.

### Money laundering and support for terrorist groups

We expect our business partners to refrain from money laundering in any shape or form and to adopt preventive measures to that end as well as to comply with reporting obligations in accordance with regulations. Furthermore, our business partners must not support terrorist groups.

### Data protection and information security

We expect our business partners to treat personal data in accordance with the provisions of data protection law within all business processes, to uphold the right to informal self-determination and to ensure the protection of business information in compliance with legal requirements.

### Export and customs regulations

Our business partners must always comply with applicable export and customs regulations in order to ensure a safe and flawless supply chain.

### Implementation and reporting requirements

The Vorwerk Group expects all business partners to comply with the requirements of this Code of Conduct.

Possible violations of this Code of Conduct should be reported via the whistleblower system on the Vorwerk Group corporate website where necessary.<sup>6</sup> Business partners undertake to inform their employees about the whistleblower system as appropriate.

### Training

We expect our business partners to provide their employees with all information and training necessary to avoid any potential violations of the law or this Code of Conduct.

### Controls

Vorwerk reserves the right to check compliance with this Code of Conduct in an appropriate manner subject to prior notification. The information and details required for this purpose must be provided to Vorwerk in compliance with the provisions of data protection law.

### Remedial action

Should any violation of these requirements be identified, suitable remedial measures must be taken immediately and Vorwerk must be informed concerning this matter. These measures, along with an implementation timetable, must be appropriately documented and submitted to Vorwerk.

### Sanctions

Any violation by our business partners of the requirements stated in this Code of Conduct will be considered a breach of contract. Should the business partner fail to comply with our requirements and fail to take appropriate remedial action within an agreed timeframe, or should the business relationship between Vorwerk and the business partner be seriously damaged, then Vorwerk reserves the right to terminate the existing business relationship with immediate effect and to terminate the contractual relationship or to withdraw from the respective contract.

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<sup>6</sup> [https://www.vorwerk-group.com/de/home/ueber\\_vorwerk/corporate-governance](https://www.vorwerk-group.com/de/home/ueber_vorwerk/corporate-governance).