

## **Preamble**

Our Code of Conduct is the guiding framework for all Nachtmann GmbH employees and business partners. It links our demand for compliance with laws and regulations with our requirements for ethical conduct. It places a demand on ourselves and, at the same time, it is a promise to the outside world. Binding legal norms can change, which is why our Code of Conduct is not closed to new standards of behaviour. The rules of conduct must be observed. Misconduct is therefore not tolerated

### **1. Compliance with laws**

In our company, compliance with the applicable national and international laws and regulations, as well as all other relevant provisions, is mandatory. In this regard, the standards to be applied shall be those which set the strictest requirements.

### **2. Child labour/youth employment**

We do not tolerate child labour or any exploitation of children and young people. National standards and laws for the protection of children and young people must be complied with.

### **3. Forced labour**

We do not tolerate forced labour, compulsory labour, debt bondage, serfdom or slave labour or conditions similar to slavery. No employee shall be forced into employment – directly or indirectly – through violence and/or intimidation.

### **4. Discrimination**

Any discrimination in relation to recruitment, employment, and remuneration is prohibited. Insbesondere ist jede Differential treatment on the basis of race, colour, sex, age, faith, political opinion, membership of a workers' organisation, physical or mental disability, ethnic, national and social origin, sexual orientation or other personal characteristics is prohibited.

### **5. Working hours**

Working hours and break times comply with the applicable laws. According to the collective agreement, the weekly working time is 37.5 hours. Overtime must be voluntary and must not exceed 22.5 hours per week and must not be required on a regular basis. Employees are entitled to at least two days off after seven consecutive working days. Overtime worked shall be remunerated separately and done so accordingly.

### **6. Employment contracts**

Nachtmann GmbH shall conclude written employment contracts with its employees containing the name, date of birth, home address of the employee, the start and duration of the employment relationship, and the salary/wage.

## **7. Remuneration**

Wages and remuneration paid for regular working hours shall be at least equal to the statutory or collectively agreed minimum wage, whichever is higher. Salary deductions for disciplinary reasons are prohibited.

## **8. Right of association and right to participate in collective bargaining**

We recognise the right to form, join or leave associations or organisations of one's own choosing for the purpose of promoting and protecting the interests of employees, and to act on their behalf, within the limits of applicable rights and laws. The exercise of employment must not be impaired in the process.

## **9. Disciplinary measures**

All employees shall be treated with dignity and respect. Disciplinary measures may only be taken in accordance with applicable national and international law. No employee shall be subjected to verbal, psychological, sexual and/or physical violence, coercion or harassment.

## **10. Health and safety**

Nachtmann GmbH ensures a safe and healthy working environment in accordance with applicable laws and regulations. Nachtmann GmbH shall take necessary measures to prevent accidents and damage to health that may arise in connection with the activity. Employees shall receive regular and documented health and safety training. This training is repeated for new employees and for returning employees.

## **11. Environmental protection**

The responsible treatment of the environment must be taken into account. National and international legal standards must be observed.

## **12. Bribery and corruption**

We do not tolerate any form of bribery or corruption. Insofar as gifts are in accordance with custom and courtesy, it must be ensured that no obligatory dependencies are created thereby and that the applicable national legal standards are observed. Our employees are prohibited from accepting or offering gifts and donations, if

- they are monetary gifts or non-market discounts,
- the acceptance of such donations is detrimental to the business interests of the company,
- the offering of the donation is directly related to the award of a contract/order,
- the donation during a negotiation or bidding process comes directly or indirectly from one of the parties involved,
- the non-cash value of the donation exceeds what is socially adequate and therefore appropriate under the circumstances of the individual case.

### **13. Protection of personal data**

Our company considers it important to treat the personal data (information that enables personal identification) of employees and business partners appropriately and to protect their rights and interests. In accordance with the applicable data protection regulations, we ensure the correct collection, storage and use of such information

### **14. Respect for intellectual property rights**

Our company takes care not to infringe the intellectual property rights of others and recognises that intellectual property is a critical corporate asset.

### **15. Free and fair trade**

Nachtmann GmbH conducts free and fair trade and competition and observes the applicable laws and regulations of the respective countries.

### **16. Further obligation on the part of suppliers and agents of the suppliers**

Nachtmann GmbH requires its suppliers to oblige their suppliers to follow a Code of Conduct that at least meets the requirements of this Code of Conduct in order to ensure complete "compliance" in the supply process (see Code of Conduct for Nachtmann Suppliers).

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