



# **Stahl Parent B.V. Business Partner Code of Conduct**

July 2018

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# 1. Introduction

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STAHL is committed to the highest standards of social and environmental responsibility and ethical conduct as described in the Stahl Parent B.V. (“STAHL”) Code of Conduct. STAHL requires its business partners to comply with the same or at least equal ethical standards and operate in accordance with the principles in this Code of Conduct (“Code”) and in full compliance with all applicable laws and regulations. STAHL expects suppliers and/or business partners to use a proactive approach in establishing and maintaining the standards set forth in this Code and conduct themselves with responsibility and integrity. The business partner states to agree to the conditions in this Code and acknowledges that any deviations found can have an adverse effect on the relation with STAHL including an immediate discontinuation of the business relationship.

The business partner commits, in signing this Code, to all applicable legislation and regulations. This Code therefore forms an integral part of the agreement between the business partner and STAHL. To verify compliance with the Code, STAHL shall consult with the business partner from time to time. STAHL has the right to speak and to train employees of the business partner directly in order to fully comply with the Code. If this is deemed appropriate, STAHL can request that an audit can be conducted by a third party to be appointed by STAHL. The business partner states to fully cooperate in this investigation.

STAHL expects his business partner to comply with the UN Global Compact Guiding Principles in the areas of human rights, labour, the environment and anti-corruption and wishes to emphasize the following specific areas of interest.

## 2. Ethical /Integrity

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### *Laws and regulations*

The business partner operates in full compliance with international, national and domestic laws and regulations that are applicable to their business operations, and obtain all necessary permits.

### *Business integrity*

The business partner shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. The business partner shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates including all applicable international anti-corruption conventions.

### *Free and fair competition*

STAHL will compete for business. The business partner also value free and fair competition throughout the world and comply with anti-trust and competition laws.

### *Confidentiality*

The business partner protect all confidential information provided by STAHL and its respective business partners.

### *Protection of Intellectual Property*

The business partner shall respect intellectual property rights and safeguard customer information. The business partner shall manage technology and know-how in a manner that protects intellectual property rights.

### *Environmental*

The business partner shall respect the environment and comply with all (supra) national environmental, health and safety legislation and regulations. The business partner shall conduct his business processes in such a manner that compliance is guaranteed.



### 3. Social

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#### *Human Rights*

The business partner shall conduct their activities in a manner that respects human rights as set out in The United Nations Universal Declaration of Human Rights.

#### *Discrimination*

The business partner shall unconditionally respect all anti-discrimination conditions in (supra) national legislation and regulations.

#### *Modern Slavery*

Modern slavery, or any form of forced or compulsory labour, is a violation of human rights. Stahl takes a strong stance against modern slavery and works to ensure high labour rights standards. Stahl condemns any form of modern slavery and child labour, and shall not participate in the trafficking, recruitment, or receipt of any persons, by means of threat or abuse of power. Stahl allows employees to resign from their position at any time. By behaving ethically and honestly with all its partners, Stahl is committed to ensuring that modern slavery does not occur elsewhere and strives only to do business with organizations who uphold similar principles.

#### *Working hours*

The business partner shall not force their employees to work excessive hours and shall comply with all (supra) national legislation and regulations concerning labour and labour conditions. In case employees are asked to work overtime, their extra work is compensated in line with local legislation.

#### *Child and forced labour*

The business partner shall respect all (supra) national legislation and regulations applying to child labour in line with Convention 138 (Minimum Age) and Convention 182 (Worst forms of Child Labour) of the International Labour Organisation. The business partner shall not use work that is performed involuntarily under threat of penalty.

#### *Health and safety*

The business partner shall implement strict policies with the aim of creating an incident and injury free work environment. At all levels, the business partner will play an active role in identifying and rectifying unsafe (health) situations.

#### **Business partner :**

Name: \_\_\_\_\_

By: \_\_\_\_\_

Title: \_\_\_\_\_

Place and date: \_\_\_\_\_

Signature: \_\_\_\_\_