# **Code of Conduct**

Dear partners,

Responsibility, integrity and compliance are part of our corporate culture and are close to our hearts. Entrepreneurial freedom is important to us. We are reliably guided by this on a large and small scale, both internally and externally. It is our aspiration and our prerequisite for successful further development.

To achieve this, we need your support. This Code of Conduct serves as a guideline and framework. We all take the rules and laws set out in it seriously - always and everywhere. From the local to the international level, i.e. EU regulations and the UN Charter. We also expect our partners to comply with these rules and laws. Because respect, trust and mutual appreciation are the basis of our cooperation with our business partners and employees. Let us work together honestly, respectfully and in compliance with the law.

#### Introduction

The Memodo GmbH Code of Conduct also applies to affiliated brands such as PEAKPLAN as well as our warehouses and locations throughout Europe. You can find all Memodo locations here: <a href="https://www.memodo.de/hier-findest-du-uns-">https://www.memodo.de/hier-findest-du-uns-</a>

We, Memodo GmbH, guarantee that we are authorized to enter into this agreement.

Memodo stands for ecologically and socially responsible corporate management and culture and expects the same from its suppliers. We pay attention to the ecological, social and ethical behavior of our employees. Especially when dealing with each other, our customers, suppliers, manufacturing partners and all other contact persons. We want to develop in a contemporary, dynamic and sustainable way. That is why we continuously question and optimize our business activities, our product range and our services in terms of sustainability.

The Code of Conduct is a code of conduct with its own rules, laws and guidelines that we give ourselves and you. We take responsibility for people and the environment. The Code of Conduct serves as the basis for all our activities. The companies of Memodo GmbH declare:

- 1. Compliance with legal regulations
  - All laws and legal regulations of the applicable legal systems of the respective countries must be complied with.
- 2. Fair business practices
  - Any form of corruption or extortion is prohibited. Embezzlement and other comparable actions associated with unfair benefits or even

- attempts to gain an unfair advantage from customers and/or other third parties through such behavior are strictly prohibited. The acceptance of undue advantages is also prohibited.
- All national and international competition laws must be complied with.
   This applies in particular to dealings with competitors with regard to prohibited agreements and other activities that influence prices or conditions, as well as the prohibition of agreements between customers and suppliers that are intended to restrict customers in their freedom to determine their prices and other conditions for resale.
- The applicable export and customs regulations must be complied with.
- All intellectual property rights of others must be respected.
- A zero tolerance policy applies to money laundering and direct and indirect
- financing of terrorism, a zero-tolerance policy applies.

## 3. Respect for human rights

- Ensure that no slavery, forced labor, human trafficking or other forms of involuntary labor are used or contributed to directly or indirectly.
- Child labor is prohibited. The protection of children in their physical integrity and the right of all children to education is a top priority.
- Appropriate measures must be taken to avoid the use of raw materials in products that originate from conflict and risk areas and contribute to human rights violations, corruption, the financing of armed groups or similar negative effects.

### 4. Compliance with working conditions

- Occupational safety and health protection are guaranteed and comply
  with the applicable legal and international standards. The work is
  organized in such a way that there is no risk to mental and physical health.
  It is ensured that working conditions are regularly assessed and that
  appropriate measures are taken immediately in the event of violations.
  Appropriate health and safety management is applied in the company.
- All employees have the right to form trade unions, join existing trade unions and participate in collective bargaining.
- The statutory working time provisions of national or internationally applicable regulations must be complied with.
- All employees have the right to appropriate remuneration. The applicable remuneration regulations must be complied with, in particular the legal provisions on minimum wages.

## 5. No tolerance of discrimination

- Equal opportunities and equal treatment of all employees are ensured. Any discrimination, regardless of race or ethnic origin, gender, religion or ideology, disability, age or sexual identity, must be prevented or eliminated.
- No employee is subjected to physical punishment, threats of violence or sexual, psychological or verbal harassment.

#### 6. Data protection

- Personal data must be processed confidentially and responsibly and exclusively within the framework of the applicable laws on data protection and information security.
- The privacy of all data subjects must be respected and it must be ensured that personal data is effectively protected and only used for legitimate purposes.

# 7. Ecological responsibility

- The company shall act in accordance with the applicable legal norms and international standards with regard to the environment.
- An appropriate environmental management system must be established, taking into account the issues of air emissions and the handling of waste and hazardous substances.
- The aim is to continuously reduce the consumption of raw materials and natural resources.

## 8. Complaints procedure

All employees and third parties have the opportunity to report violations
of the principles of this to report violations of the principles of this Code of
Conduct.

For future cooperation, the contracting parties agree that the above regulations shall apply as a common code of conduct. This agreement shall form the basis for all future deliveries.