

**beeline Guidelines**

# Supplier Code of Conduct

Product and product presentation

<b>Scope:</b> beeline product and product presentation suppliers	<b>Revision:</b> 5 (V1/2024)	<b>Date:</b> 01.01.2024
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Review and revision of the present document <sup>1</sup>		
Revision no.:	Date:	Description of the revision:
0		New document.
1	2015	
2	2017	
3	2019	
4	2020	
5	2024	Rework and legal adjustment due to the Supply Chain Act

## Introduction

beeline is committed to sustainable business practices which refer to doing business in line with applicable laws and regulations and the guidance of ethical and environmental principles that are also reflected in our corporate guiding principles. These principles are:

Focus & Impact, Teamwork & Collaboration, Growth & Improvement, and Responsibility and Sustainability. They do not only apply to our own workforce, but also guide our day-to-day business with all business partners.

The beeline Supplier Code of Conduct is based on standards set by the International Labour Organization (ILO Core Conventions), UN International Covenant on Civil and Political Rights, UN International Covenant on Economic, Social and Cultural Rights, UN Human Rights, UN Rights of the Child, UN Guiding Principles on Business and Human Rights, the German Supply Chain Due Diligence Act, principles of the Rio Declaration on Environment and Development, OECD Guidelines for Multinational Enterprises, Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, the Stockholm Convention on persistent organic pollutants (POPs), the Minamata Convention on Mercury & EU Regulation introducing a compulsory due diligence scheme for the trade in conflict minerals.

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<sup>1</sup> This is a controlled document that is reviewed annually. Each time it is revised, it is given a new version number.

The beeline GmbH Supplier Code of Conduct does not only contain the requirement to comply with the law but also sets out the need to behave ethically and in a sustainable manner. It provides overarching, binding guidance and is therefore made available to our suppliers for the sustainable development in daily operations and is a fundamental approach to select and evaluate the beeline supplier and we expect from our suppliers to abide by the same principles and standards.

It is beeline's entrepreneurial self-confession and at the same time the expectation of all business partners that with regard to business relations with beeline all applicable laws and the customary corporate ethical standards are complied with. The supplier is therefore obliged to comply with all legal provisions relevant to the subject matter of the contract and to observe this Supplier Code of Conduct and the specific requirements and obligations regulated therein. In addition, Supplier shall use reasonable and necessary efforts to ensure compliance by its suppliers with their obligations under this Supplier Code of Conduct.

The supplier is obligated to ensure compliance with the principles and obligations regulated in the Supplier Code of Conduct by means of corresponding contractual requirements vis-à-vis its direct suppliers and to obligate these suppliers to pass on the obligation to comply with the principles along the supply chain relevant for beeline to their direct suppliers.

The Supplier Code of Conduct is formulated in broad, universally applicable terms and is not supposed to replace detailed regulations. It rather aims to provide our suppliers with a clear understanding of the principles and ethical values, as well as the corporate responsibility.

beeline is entitled to request further information in individual cases with regard to compliance with the laws and the requirements listed in this Supplier Code of Conduct and to check compliance on site. In any review, the legitimate confidentiality interests of the supplier shall be taken into account and the business processes shall not be impaired as far as possible.

## **Legal compliance & intellectual property rights**

beeline requires all suppliers at all levels of the supply chain to always comply with national and other applicable laws and regulations as well as beeline expects suppliers to support the implementation of due diligence procedures in line with the German Supply Chain Due Diligence Act. Where the provisions of the laws, regulations and the beeline Supplier Code of Conduct address the same subject, suppliers have to apply that provision, which affords the greater protection of workers or the environment.

The intellectual property rights of third parties will be respected by the suppliers as well as by beeline. Thus, unlawful copies are neither offered, nor produced by the suppliers.

## **Monitoring & attitude**

Suppliers ensure an open, respectful, and transparent attitude towards beeline which includes the disclosure of production units up to the raw material and components each supplier level utilized for the

production, full access to documents, facilities, and employees, if required. Suppliers have to allow beeline and its representatives, as well as authorized third parties, to conduct audits, no matter if announced, semi-announced or unannounced. We strive for continuous improvement of our supply chain and expect the same from all suppliers in our supply chain. It is one of the key components of the cooperation between beeline and the supplier to be complaint with these principles within the whole supply chain.

## **Employment conditions**

In addition to the general requirement that all suppliers extend the principle of fair and honest dealings to all others with whom they do business, beeline also has specific requirements relating to employment conditions based on the requirements outlined in this Supplier Code of Conduct. These specific requirements are outlined in the employment guideline. The supplier is aware of the guideline and ensures to act in conformity with this guideline within its own production unit as well as in the whole supply chain for products delivered to beeline.

### **I Prohibition of Child Labor**

beeline does not tolerate any form of child labor. Suppliers ensure that no worker younger than 15 years, -or older, if it is required by local laws-, is engaged in the production of beeline goods. Workers performing hazardous activities or working during night shift have to be at least 18 years of age. Suppliers have to apply preventive measures to avoid the hiring of children and ensure the prohibition of worst forms of child labor which includes but is not limited to all forms of slavery and trafficking of children.

### **II Prohibition of involuntary labor**

Suppliers have to assure that workers are only hired on the basis of their own free choice. All kinds of direct and indirect forced labor are strictly forbidden which also includes the withholding of salary or personal documents, all forms of slavery, trafficking, serfdom or other forms of domination.

Disciplinary measures have to include effective conciliation procedures, be respectful and in line with local laws at all times.

### **III Prohibition of discrimination & harassment**

beeline values the principle of diversity among its workforces. Thus, we expect that no worker in our value chain is discriminated by any reason, harassed, abused, or treated harshly, physically or verbally, at no circumstances. Any kind of discrimination is prohibited. Employees have neither to be advantaged nor disadvantaged due to their sex, gender, nation, ethnic origin, religion, race, appearance, social or cultural background, family responsibilities, marital status, disabilities, sexual orientation, union membership, political attitude, employment condition, pregnancy, migrant background, health status among others.

Suppliers shall offer equal job opportunities and show consideration for diversity management. Vulnerable groups, such as female, migrant, disabled, agency or home workers among others have to be seen with special consideration according to their rights and needs.

## **IV Management system**

### **IV.1 Management system & business documents**

Suppliers have to apply an effective management system and maintain records properly. Business-related documents, permissions and licenses have to be up-to-date and in line with local laws and regulations at all times.

### **IV.2 Human resource management**

Personnel files, employee roster, labor contracts, attendance and payroll records have to be in line with local laws and regulations at all times and up to date. Suppliers have to outline in a policy how to protect the privacy of personal data.

### **IV.3 Impact Assessment (ESHIA)**

Suppliers are required to perform an assessment regarding their social, environmental and health impact. Suppliers have to establish grievance procedures for managing workers' complaints.

## **V Occupational Health & Safety (OHS)**

### **V.1 OHS Management system**

Suppliers have to provide employees a safe and hygienic working place with appropriate light, heating and ventilation. All necessary preventive and emergency response measures have to be prepared and applied on the basis of an effective risk assessment related to mechanical, chemical, fire and general health and safety of workers and workplace. Each worker has to be trained according to OHS laws and regulations prior to starting a new job as well as on a regular basis, at least annually. Each worker who is engaged in special and/or dangerous operations has to receive a special training fitting to the performed task. These workers have to undergo an occupational health check prior to starting a new job, on an annual basis as well as after quitting a job. Suppliers are requested to assign a Safety Officer or Safety Committee. The Safety Officer or Safety Committee has to carry out regular inspections on all safety-relevant issues.

### **V.2 Building & fire safety**

beeline requires all production buildings to be unobjectionable which has to be proven by governmental or qualified third-party certificates. Additionally, there have to be firefighting and fire preventing equipment and preventive and emergency response procedures provided. Fire and emergency evacuation drills have to be held at least every 6 months.

For reasons of building and fire safety there are provisions suppliers have to comply with if they are not the only tenant of the production building or the production area as outlined in the multi-tenancy policy.

### **V.3 Personal protective equipment (PPE)**

Suppliers have to provide personal protective equipment (PPE) to each employee according to the risk assessment of their working place, the material safety data sheets (MSDS) and safety data sheets (SDS), if applicable.

#### **V.4 First aid**

Suppliers have to train at least 5% (in any case not less than two employees) of the total workforce to be first aiders. Where legally required, an occupational nurse or doctor has to be hired. First-aid kits have to be well stocked, and the medicine has not to be overdue.

#### **VI Working time & overtime hours**

Workers shall not exceed the regular and overtime working hours permitted by local laws. Information about working time and overtime hours has to be provided to each employee and in line with local laws and regulations. Overtime must be worked voluntarily in all cases.

Proper rest periods have to be provided during the working day and between two working days. At least one day off during a seven-days period or two days off during a fourteen-days period has to be given. Suppliers have to provide paid annual leave, personal leaves and bank holidays, at least as stipulated by local laws and regulations.

#### **VII Remuneration**

Payments, including wages, benefits and compensations, have to be in line with local laws, on time, above the legally fixed local minimum wage and paid directly to the worker. Cash payments are not permitted. Suppliers have to provide a suitable premium rate for overtime hours as required by local law. Workers have to be informed about all remuneration regulations.

#### **VIII Social insurances**

Employees are entitled to receive occupational social insurances as stipulated by local laws. Suppliers have to pay the contributions on time and keep the receipts.

### **IX. Environment & animal welfare**

#### **IX.1 Environmental management system (EMS)**

beeline suppliers have to comply with local laws according to environmental issues at all times. Furthermore, beeline requires an efficient and proactive environmental management system (EMS) that identified environmental aspects and risks of the production processes and legal requirements. All the incidents or accidents with impacts on the environment at beeline group or at beeline supplier sites are well reported.

#### **IX.2 Chemical management system (CMS) & chemical safety**

Suppliers have to set up a chemical management system (CMS) in order to assure the compliance with beeline's restricted substances list (RSL) and manufacturing restricted substances list (MRSL). Supplier assures that chemicals are purchased from the positive lists preferably that contains information on safer chemical alternatives to hazardous chemicals, materials, or products used in the production processes. A safe handling of chemical substances according to the risk assessment is mandatory for protecting employees. As every chemical has different properties, it is significant to check and label the appropriate

CAS numbers as these are unique and globally verified. Chemical substances have always to be labelled and stored properly and a chemical inventory and related MSDS have to be kept. Suppliers have to establish efficient exposure control measures.

Suppliers must pay high attention to the international treaties like Minamata & Stockholm Convention that seeks to protect human health and environment from anthropogenic emissions and releases of mercury, mercury compounds and persistent organic pollutants (POPs) respectively.

Suppliers have to provide chemical and waste hazard training to all the employees prior to start a new job as well as regularly, but at least two times in a calendar year.

### **IX.3 Waste management & emissions**

Suppliers have to set up an efficient waste management system. Waste disposal has to be in line with local laws and regulations, especially those requirements outlined in the Basel Convention which defines regulates the transboundary movement of hazardous wastes and other wastes and obliges its parties to ensure that such wastes are managed and disposed of an environmentally sound manner at all times. Suppliers have to keep records about their emissions. Suppliers are requested to work towards the elimination of hazardous substances from the supply chain according to the Zero Discharge of Hazardous Chemicals (ZDHC) Programme.

### **IX.4 Animal welfare**

beeline loves animals. Thus, beeline perceives the right of treating animals with respect as universal. beeline does not accept any product from animal-derived raw materials of which production processes included harsh treatment of animals or even torturing animals. Thus, live plucking of feathers and downs is strictly forbidden.

Animal-derived products are allowed only as by-product of the food industry. Suppliers have to disclose information, such as the scientific name among others, about plant-based or animal-derived raw materials.

Suppliers have not to use any kind of animal-derived materials, such as, but not limited to, bones, leather, feathers, skin or hair used from: cashmere, shearling, karakul, vicuña, shahtoosh, angora (mohair), cat, dog, rabbit, angora rabbit, marten, racoon, fox, squirrel, chinchilla, pashmina, any exotic animal, such as reptiles. Excluded from sale are products containing leather processed in Bangladesh, any kind of real fur, cotton from Uzbekistan and sandblasted items.

beeline does not accept products including raw materials, no matter if plant-based or animal-derived, that are listed as any kind of endangered on the [→ IUCN Red List](#). Suppliers have to buy natural-derived materials from domesticated animals and species.

## **X. Homeworkers**

Suppliers have to disclose and maintain records about homeworking activities. All regulations outlined in this Supplier Code of Conduct are also applicable for homeworkers.

## **XI. Sub-contractors**

Suppliers have to comply with the requirements outlined in beeline's sub-contracting and outsourcing policy. Above that, suppliers have to disclose and maintain records about sub-contracting and outsourcing activities. All regulations outlined in this Supplier Code of Conduct are also applicable for the entire supplier's supply chain.

## **XII. Freedom of association & the effective right to collective bargaining**

Every worker is entitled to form, join, and organize trade unions of their own choice and to bargain collectively on their behalf with the company. The rights have not to be restricted by the supplier. The supplier has to accept and implement collective agreements and inform the employees about their rights. It is prohibited to neither advantage nor disadvantage employees who act as workers representatives so that they can exercise their roles without fear of reprisal or discrimination.

## **XIII. Business integrity**

### **XIII.1 Anti-corruption & bribery prevention**

Suppliers have to conduct their business in fair and transparent manner and should not practice or tolerate any form of bribery or corruption. The offer, pay or promise of bribes or other improper gratuities, as well as to demand, receive, take or accept those, neither directly or indirectly, is strictly forbidden. Above that compliance with all applicable national and international anti-bribery and corruption laws, standards and regulations, such as but not limited to US Foreign Corrupt Practices Act (FCPA), UK Bribery Act 2010 and United Nations Convention Against Corruption – UNCAC, is mandatory at all times.

### **XIII.2 Money laundering**

Suppliers have to take care not to be involved into any facilitating activity which may be connected with any form of money laundering or terroristic financing.

Suppliers need to be compliant to all applicable anti-money laundering or anti-terrorist financing laws and regulations.

## **XIV. Community impact**

### **XIV.1 Natural resources & right to health**

Suppliers have to take care that their business procedures are not causing any harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption. The community's right to have access to food, drinking water or sanitary facilities and their right to preserve their health has to be respected and must not be restricted.

### **XIV.2 Land management**

Suppliers have to take care that the land they are using or will be using for their business procedures, including forests or water bodies, is not bought, cultivated or used under unlawful eviction or unlawful taking.

## **XV. Reporting breaches**

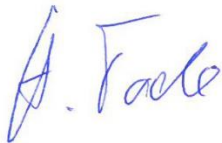
Openness, transparency and a culture of trust are particularly important to beeline. In line with this beeline requires its suppliers to inform about all violations regarding the mentioned paragraphs in this Supplier Code of Conduct. Furthermore, suppliers should enable their employees to raise, and report concerns to beeline as well. This can be done confidentially via beeline's Supplier Complaints Line.

Suppliers guarantee, that all of their employees are informed about the beeline Complaints Line and are granted access at all times.

## **Enforcement**

The supplier shall design and implement suitable compliance training measures in which the managers and employees of its company are provided with an appropriate level of knowledge and understanding of the principles regulated in the Supplier Code of Conduct and the applicable laws. beeline shall support the supplier in implementing these requirements by providing targeted information and training.

The supplier shall review and take into account any change required for beeline based on material results of the risk analysis to be performed annually or on an ad hoc basis in accordance with the German Act on Corporate Due Diligence in Supply Chains.



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