



**Business Partner**

# **Code of Conduct**

## Introduction

Sekels Business Partner Code of Conduct is based on our internal Code of Conduct and includes three pillars: Compliance, Ethics and Integrity, Social Responsibility and Environment & Safety.

We expect our business partners such as suppliers, customers, distributors and agents to do likewise. Non-compliance with this Business Partner Code of Conduct may lead to measures including termination of the business relationship.

**Stefan Becker**  
CEO



## Compliance, Ethics, and Integrity

We expect our business partners to

- **Conduct** their business according to all applicable laws and regulations in the countries in which they operate and apply the highest ethical standards. To ensure this, they shall provide support and guidance on the one hand and reasonable repercussions for violations on the other hand.
- **Rebuff** corruption and bribery as stated in the relevant UN convention. They shall employ suitable means to promote transparency, integrity and responsible management and control the company in an appropriate manner.
- **Abide** by regulations that protect the consumer, as well as appropriate, marketing and information practices. Particular attention shall be paid to vulnerable groups (e.g., protection of minors)
- **Communicate** in an open manner and shall be oriented towards the dialogue about this Code of Conduct and its implementation among their customers, business partners and other stakeholders.

All documents and information shall be duly produced and shall not be unreasonably modified or destroyed. Company secrets and business partner's information shall be handled sensitively and shall be kept confidential.



## Social Responsibility

We expect our business partners to

- **Commit** to promote human rights and respect human rights in accordance with the UN Charter on Human Rights, with a particular focus on privacy, harassment, and freedom of expression.
- **Abide** by the following core work standards from ILO (International Labor Organization):

### Child labor

The prohibition of child labor, i.e., the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and unless exceptions are permitted.

### Forced labor

The prohibition of forced labor of any kind.

### Anti-Discrimination

Treatment of all employees in a non-discriminatory manner.



## Employee Rights

We expect our business partners to

- **Respect** the right of workers to freedom of association, freedom of assembly and collective bargaining, to the extent permitted and possible by law in the country concerned.
- **Comply** with the work standards concerning the longest permitted working hours.
- **Contribute** to the social and economic development of the country and region in which they operate and promote corresponding voluntary activities by their employees.



## Environment and Safety

We expect our business partners to

- **Act** in an environmentally conscious manner and follow the regulations and standards on environmental protection that affect their operations.
- **Employ** their best efforts to comply with all requirements related to conflict minerals and to report to us the presence and country of origin of any and all conflict minerals in their products, in accordance with the stipulations of the US Dodd-Frank Act of 2010, and any other similar law arising under any other jurisdiction.
- **Ensure** their employees' safety and make our employees and external visitors aware of and instruct them to apply safety rules applicable on their premises. Risk assessments of processes in the workplace shall be carried out to reduce and prevent the risk of injuries and illness. Safety incidents analysis shall be in place to prevent further accidents.
- **Follow** the product safety regulations and communicate product handling and storage requirements. Products and substances supplied to Sekels GmbH, or materials used to manufacture products must fulfill the applicable regulations, in particular REACH regulation EC 1907/2006 with the obligations concerning SVHC (Substances of Very High Concern).
- **Comply** with the local environmental law and regulations applicable in their locations (e.g., waste directives, energy efficiency, industrial emissions) and ensure that the necessary authorizations and permits are in place. Business partners shall conduct their operations in an environmental sound manner. They prevent pollution on their premises and reduce waste and emission to the surrounding environment.

### Compliance Contact

compliance@sekels.de

+49 6002 93 790