

Blefa is committed to complying with the law wherever it does business. We are committed to international human rights and fundamental labor law standards (e.g. the ten principles of the UN Global Compact and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work). Blefa has set itself binding guidelines in its Code of Conduct for acting responsibly.

Blefa expects its suppliers (i.e. all contracting parties that supply a Blefa with goods, materials, or services), its third party intermediaries and their employees to act ethically and comply with the minimal principles outlined in this Blefa Supplier Code of Conduct ("Code").

This Supplier Code of Conduct sets out the minimum requirements of behavior and practices we place on our suppliers and third party intermediaries, in addition to the provisions of any commercial terms or contracts agreed between Blefa and you. In the event that local law, regulation or rules impose stricter requirements than this Code, you must comply with those stricter requirements.

Ethics

1. Fully comply with applicable laws and conduct your business in an ethical manner.
2. Abstain from and/or disclose all conflicts of interests in business dealings with Blefa and provide notice as soon as they are known.
3. Respect the intellectual property rights of others.
4. Abstain from corruption or bribery in any form. No direct or indirect bribery or facilitation payments shall be made or accepted with the aim of unjustly influencing public officials, judiciary and/or any representatives in a business relationship including employees of Blefa.
5. Process personal data confidentially and responsibly and ensure that personal data is effectively protected and used only for legitimate purposes.
6. Comply with applicable trade/export control and customs regulations.

Human Rights and Labor Practices

7. Reject child labor. Comply with local laws regarding the minimum age of employees and respect human rights of children.
8. Reject forced, bonded, prison, military or compulsory labor or any form of human trafficking.
9. Do not tolerate any discrimination or harassment in the workplace due to the grounds of gender, age, skin color, national origin, race, sexual orientation, religion or any other legally protected personal characteristic. Promote equal opportunities and treatment of employees.
10. Respect the rights of employees to freely associate and bargain collectively, free of any restrictions or consequences.
11. Provide your employees a fair pay for skill, contribution and performance and respect local wage and compensation laws, especially with regard to minimum wages.
12. Adhere to all applicable working-hours regulations globally.
13. Act in accordance with applicable statutory and international standards regarding occupational health and safety. Provide employees with safe and healthy workplaces, including the company-provided living quarters.

Environment, climate protection and responsible Sourcing

14. Increase energy and resource efficiency and comply with all applicable environmental laws, including precautionary measures to environmental challenges.
15. Comply with regulatory requirements regarding the prohibition and restriction of harmful substances in your products.
16. Take reasonable efforts to avoid the use of raw materials in your products which originate from conflict-affected areas.
17. Use reasonable efforts to make your suppliers and subcontractors comply with the principles of this Code.

Implementation and monitoring

This Code shall be signed by all suppliers and third party intermediaries and you shall communicate the principles in this Code to your employees.

You shall maintain appropriate records to demonstrate compliance with the requirements of this Code and you will make these available to the Blefa upon request at any time. Blefa will monitor compliance with this

Code. The monitoring can be done through the self-evaluation questionnaire or through on-site audits. An on-site audit will be carried out whenever Blefa thinks this to be necessary.

Noncompliance with this Code

If you do not observe the principles laid down in this Code, Blefa is entitled to immediately terminate the business relationship with you for cause without any compensation. It is within the discretion of Blefa to take remedies instead, if a supplier or a third party intermediary provides credible assurance and proves that it has immediately initiated countermeasures to prevent comparable violations occurring in future.