

CODE OF CONDUCT

TB INTERNATIONAL GMBH



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BASIC UNDERSTANDING OF SOCIALLY RESPONSIBLE CORPORATE GOVERNANCE & SCOPE OF APPLICATION

We, TB International GmbH, see ourselves as part of the societies in which we do business and are committed to socially responsible corporate governance. We take into account the effects of our direct and indirect business activities on society, and the environment and constantly strive to achieve an appropriate balance of interests in economic, social and ecological terms.

Our success is based on trusting cooperation with our stakeholders. For this reason, we have established binding principles of conduct for the entire company in our Code of Conduct, hereinafter referred to as CoC. The CoC clarifies which values TB International GmbH expects from its own employees and business partners, as well as from all participants in the international supply chain, hereinafter referred to as „we“.

Our CoC is based on recognized values and principles as expressed in the United Nations Universal Declaration of Human Rights¹, the ILO Core Labor Standards², the UN Guiding Principles on Business and Human Rights³, the amfori BSCI Code of Conduct⁴ and the OECD Guidelines for Multinational Enterprises⁵.

We undertake to implement this CoC voluntarily at the highest corporate level and to make appropriate and reasonable efforts, within the scope of our respective possibilities, to comply with the voluntary commitment on an ongoing basis at all our sites. We communicate the contents of the CoC in an appropriate manner to our employees and other key business partners.

TB International takes any violation of the CoC seriously and allows employees, business partners and others to report any violations confidentially through our Sustainability Officers at sustainability@tbint.de.

¹ https://www.ohchr.org/sites/default/files/UDHR/Documents/UDHR_Translations/eng.pdf

² <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/lang--en/index.htm>

³ https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

⁴ <https://www.amfori.org/en/knowledge-centre/resources?search=&from=&to=&topic=&resourceType=codeOfConduct&language=en&audience=>

⁵ <https://www.oecd.org/daf/inv/mne/48004323.pdf>



HUMAN RIGHTS & SOCIAL RESPONSIBILITY

We respect human dignity and uphold internationally recognized human rights. We are committed to respecting and protecting human rights and comply with the UN Human Rights Charter. In all our business activities, we always strive neither to cause nor to contribute to human rights violations.

EMPLOYMENT RELATIONSHIP

We treat our employees with respect and reject any form of unlawful punishment, abuse, harassment, intimidation, or other undignified treatment of employees.

We comply with the applicable labor law in all employment relationships. Employees shall be provided with comprehensible information on the essential terms and conditions of employment, including their rights and obligations as well as working hours, remuneration, payment and accounting modalities, at the beginning of the employment relationship. Sanctions, fines, other penalties or disciplinary measures may only be taken in accordance with applicable national and international laws and internationally recognized human rights. The employee's name, date and place of birth and, if possible, home address must be recorded.

We respect and protect the right of employees to terminate their employment in accordance with the applicable notice period. (In accordance with ILO Convention 190)

PROHIBITION OF CHILD LABOR & PROTECTION OF YOUNG WORKERS

We do not tolerate child labor and observe the applicable minimum legal age for admission to employment. In any case, we do not employ persons under the age at which compulsory education ends according to the law of the place of employment and under the age of 15.

TB International expects business partners to have adequate means of determining age to prevent child labor. Should child labor be identified, all necessary measures shall be taken immediately, focusing on the well-being, protection and development of the child. The measures taken shall be documented.

In the case of persons under 18 years of age, the rights of adolescent workers shall be respected; they may only be employed if it is ensured that the working and employment conditions do not pose a risk to their health, safety or morals, nor are harmful to their development.

(In accordance with ILO Conventions 138, 182 and ILO Recommendation 79, 146)

PROHIBITION OF FORCED LABOR

We reject any form of forced or compulsory labor, including any form of bonded labor, servitude, slavery or practices similar to slavery, human trafficking, or other involuntary labor or services that are inconsistent with internationally recognized labor and social standards. No employee shall be directly or indirectly coerced into employment by force and/or intimidation. Employees shall only be employed if they have voluntarily made themselves available for employment. (In accordance with ILO Conventions 29 and 105)



DIVERSITY, INCLUSION & PROHIBITION OF DISCRIMINATION

We promote a work environment that enables inclusion and values the diversity of our employees. Employees are selected, hired and promoted based on their qualifications and skills. We reject any form of discrimination or unjustified unequal treatment in employment, for example on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, skin color, political opinion, religion or ideology. We also take into account the principle of equal pay for male and female workers for work of equal value.

(In accordance with ILO Conventions 100, 111, and ILO Recommendation 143)

HEALTH & SAFETY AT WORK

We comply with national and international occupational health and safety standards and provide a safe and healthy working environment to maintain the safety and health of our employees, protect third parties and prevent accidents, injuries and work-related illness. This includes regular risk assessments of workplaces and the implementation of appropriate hazard prevention and precautionary measures, including the provision of suitable personal protective equipment. We ensure that our employees are trained in all relevant occupational safety topics and that the implementation of the measures is documented in writing. Clean toilets and access to sufficient drinking water must be provided. If sleeping quarters are provided, they must be clean, safe and meet basic requirements.

(In accordance with ILO Convention 155)

FREEDOM OF ASSOCIATION & FREEDOM OF ASSEMBLY

We respect the right of employees to freedom of association, freedom of assembly and the right to collective bargaining to the extent that this is legally permissible and possible in the respective country of employment. If this is not permissible, we seek appropriate compromises for our employees.

(In accordance with ILO Conventions 87, 98, 141 and 154, as well as ILO Recommendation 135 and 143)

WORKING TIME

We comply with the legal or applicable collective bargaining provisions on working hours, including overtime, rest breaks and recuperation leave. In any case, we ensure that

- the regular weekly working time does not exceed 48 hours plus a maximum of 12 hours of overtime per week,
- the right to rest breaks is respected on each working day,
- six consecutive working days are regularly followed by a day off, and
- legal or religious holidays and vacations are respected.

Overtime shall be compensated or remunerated at least in accordance with legal or collective bargaining regulations, and its ordering shall be exceptional and exclusively on a legal, collective bargaining or contractual basis.

(In accordance with ILO Conventions 1, 14, and ILO Recommendation 110)



REMUNERATION

We comply with statutory or - where applicable - collectively agreed provisions in the remuneration of labor services. We ensure that the wages we pay do not fall below the applicable statutory or applicable collectively agreed or industry-standard minimum wage and are paid regularly. In countries or regions without a statutory or collectively agreed wage framework, we ensure that the wage paid is sufficient to meet the basic needs of the employees. We do not tolerate wage deductions that are not permitted by law, including wage deductions as a disciplinary measure. Employees shall be informed regularly and in detail about the composition of their remuneration in an understandable form.

(In accordance with ILO Conventions 26 and 131)



ECOLOGICAL RESPONSIBILITY

The protection and preservation of natural resources concerns and obligates us all. With this in mind, we conduct our business activities with due regard for ecological aspects.

ENVIRONMENTAL PROTECTION & CLIMATE PROTECTION

We fulfill our ecological responsibility by complying with applicable legal requirements and recognized standards for the protection of the environment and climate, and by making efforts to continuously improve the impact of our business activities on the environment and climate.

We have taken appropriate measures based on legal and internationally recognized standards, covering topics such as:

- Professional and responsible handling of hazardous substances and other chemicals and of waste, including disposal;
- Efforts to reduce or avoid waste and minimize emissions from operations (e.g. wastewater, exhaust air, noise, greenhouse gases);
- Conservation of natural resources, such as through measures to conserve water, chemicals and other raw materials;
- Promoting the use of climate- and other environmentally friendly technologies, processes, raw materials and products;
- Efforts to increase energy efficiency and the share of green or renewable energies in energy consumption at our company sites.
- Regulation on Responsible Sourcing of Minerals

ANIMAL- & SPECIES-PROTECTION

We observe the principles for the protection of animals and biodiversity, and align our corporate actions accordingly. The keeping and use of animals must comply with the applicable legal animal welfare requirements and be appropriate to the species. We refer to the Five Freedoms of Animal Welfare and follow the Washington Convention on International Trade in Endangered Species (CITES)⁶ for the protection of endangered species and plants.

⁶ https://cites.org/sites/default/files/1/Brochure_UNEP_CITES_eng.pdf



ETHICAL BUSINESS & INTEGRITY

We behave in a fair and respectful manner toward our business partners. We respect the different legal, economic, social and cultural backgrounds and circumstances of the countries and regions in which we operate. We pursue only legitimate business objectives and practices and comply with the laws and regulations of the countries and regions in which we do business. We always base our business activities on universally accepted ethical values and principles, including integrity and respect for human dignity.

ENTREPRENEURIAL ACTION

We advocate free and fair competition and pursue only legal business practices in compliance with fair competition, third-party intellectual property rights, and antitrust and competition regulations. We pursue principles of responsible corporate governance such as transparency, accountability, responsibility, openness and integrity. Contracts must be adhered to unless there is a fundamental change in the general conditions.

BRIBERY, CORRUPTION & DONATIONS

We reject any form of bribery or corruption. We make our decisions exclusively on the basis of objective criteria and do not allow ourselves to be influenced by personal interests and relationships. We neither accept nor offer donations or unfair advantages intended to influence. We act in accordance with applicable import and export control regulations and comply with legal requirements for the prevention of money laundering. We only grant donations in kind and money to needy persons and institutions that are recognized as non-profit organizations or authorized to accept donations by special regulations as part of a transparent approval process. In the event of suspicion, we take appropriate measures.

DATA PROTECTION, IT-SECURITY, PROTECTION OF KNOWLEDGE & INTELLECTUAL PROPERTY

We respect the personal rights of our employees, business partners, customers and comply with the applicable legal and regulatory requirements for the processing of personal data and for information security when handling personal information. We take great care to ensure that the trade secrets and other confidential information of our business partners and customers entrusted to us are adequately protected against unauthorized acquisition, use and disclosure, at least in accordance with the relevant legal provisions on the protection of trade secrets. We respect the intellectual property of our business partners, customers and other third parties and ensure that sufficient precautions are taken to protect intellectual property rights when transferring know-how and technologies.



PRODUCT SAFETY & CONSUMER INTERESTS

We take appropriate measures to ensure the safety and quality of the products and services we provide. We ensure that our products or services comply with applicable laws and regulations. Any deviations that occur are counteracted in good time by means of suitable measures. We take consumer interests into account in our information and sales activities by applying fair business, marketing and advertising practices and promoting consumer education. We pay particular attention to the interests of children, senior citizens, people with disabilities and other vulnerable consumer groups.



IMPLEMENTATION

We make appropriate and reasonable efforts to comply with the contents of the Code of Conduct on an ongoing basis at all of our company's sites. We have established suitable measures and processes with clear responsibilities for this purpose and document their implementation and improvement within the company in an appropriate manner. The management keeps itself informed at regular intervals about the implementation and work of the responsible departments and persons.

EXPECTATIONS OF OUR SUPPLY CHAIN, CONTROL MEASURES & SANCTIONS

We expect our business partners and other contractual partners in our supply chain to follow this CoC or apply a comparable code of conduct and encourage them to demand this expectation from the contractual partners in their supply chain.

We are committed to long-term business relationships based on partnership. We therefore identify and review our contractual partners in a suitable manner before entering into a supply relationship, e.g. by means of self-disclosure, supplier evaluation or similar. We reserve the right to monitor our supplier partner's compliance with our expectations, e.g. by means of audits or on-site visits to production facilities. If serious violations are found, we reserve the right to appropriate contractual consequences, including termination of the business relationship. In any case, we expect that identified violations will be responded to with appropriate preventive or remedial measures.

COMMUNICATION & TRAINING

We communicate the contents of the Code of Conduct to our employees, business partners and other key stakeholders. Our employees receive training on individual topics of the CoC as needed, and we expect our employees to comply with the CoC.

COMPLAINT PROCEDURE & ACTION ON VIOLATIONS

We, TB International GmbH, take any violation of the Code of Conduct seriously. Complaints or indications of violations can be reported confidentially at any time to sustainability@tbint.de. In the event of reports of violations, we will initiate measures for proper and confidential clarification and, if necessary, take appropriate countermeasures in terms of remediation or prevention.





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