



# **CODE OF CONDUCT FOR BUSINESS PARTNERS**

Frauenthal Gnotec Group

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# Purpose

This code of conduct for Business partners (the “code”) expresses a vision of responsible business behavior and sets forth the business principles that Frauenthal Gnotec Group requires all its Business Partners to abide by in the course of their relationship with Frauenthal Gnotec Group.

The term “Business Partner” covers any person or entity (Including its directors, officers and employees) that Frauenthal Gnotec Group does business with, including but not limited to organizations that supply goods or services to Frauenthal Gnotec Group and representatives who conduct business on Frauenthal Gnotec Groups behalf.





# **Frauenthal Gnotec Groups Expectations from its Business Partners**

Business Partners are required to meet all of the following requirements in the course

# Principles

**Frauenthal Gnotec Group is committed to responsible business and intends to demonstrate this commitment to integrity, Business responsibility and trust through its value chain.**

Therefore, Frauenthal Gnotec Group expects the same level of commitment from its business partners. By entering into a business relationship with Frauenthal Gnotec Group, Business partners are required to:

- conduct their business in compliance with all applicable laws and regulations (which requires Business Partners to maintain awareness regarding these laws and regulations) and with the principles stated in this code; and
- ensure that their employees and subcontractors are made aware of and comply with applicable laws and regulations and with the principles set forth in this code.

Business partners are expected to choose the suppliers they retain in relation with Frauenthal Gnotec Group business with appropriate due diligence, communicate the principles set out in this Code (or equivalent principles) to their suppliers and ensure compliance with these principles.

This code includes requirements that are based on internationally recognized principles that Frauenthal Gnotec Group strongly support such as:  
-The 10 principles laid in the UN Global Compact, which covers human rights, labour, the environment and anticorruption.



# 1. Working Conditions and Human rights

## **Respect Basic Human Rights**

We expect Frauenthal Gnotec Groups Business Partners to:

- protect their co-workers against violation of their human rights and to provide working conditions in line with international global standards.
- never accept violation of basic human rights, including children's rights.

## **Child labour and forced labour**

Business partners shall never use child labour, prison labour or any other form of forced labour.

## **Wages and benefits**

Business Partners shall pay its employees according to current agreements and local standards.

## **Working Hours**

Business Partners must comply with applicable legislation regarding working hours (including but not limited to overtime and overtime compensation) and rest rules.

## **Non-discrimination and equal opportunities**

Business Partners shall be an equal opportunities employer and must never discriminate on the grounds of gender, ethnicity, disability, sexual orientation or religious belief.

## **Freedom of association and collective bargaining**

Business Partners shall respect the freedom of association and the right to collective bargaining must be maintained.

## **Health and safety**

Safety should always come first and Frauenthal Gnotec Group's Business partners must at all times maintain correct health and safety instructions and ensure that effective preventive measures are taken.

Avoid the use of toxic or hazardous substances, materials and processes. Follow carefully instructions, policy and stipulations regarding health, safety and the environment at your workplace.





## 2. Caring for the Environment

Business partners must ensure that they comply with all applicable environmental laws and regulations. In addition, Business Partners are expected to support Frauenthal Gnotec Group's commitment to a sustainable business, protecting the environment and limiting our overall environmental impact throughout the value chain.

Frauenthal Gnotec Group expects their Business partners to minimize waste and pollution, be it energy use, transportation or material handling. Their local presence shall be responsible and respectful also regarding the environment. This includes endeavor to minimize the environmental impact by, for example, reducing waste, emissions, conserving resources and promoting efficient energy use. Transportation and travel should always be considered in terms of sustainability, striving for least possible environmental impact.

### **General expectations**

Frauenthal Gnotec group expects business partners to have:

- An environmental management system in place that allows them to continuously improve their environmental performance.
- Procedures to manage environmental performance of own business partners.
- system in place to communicate environmental performance with relevant stakeholders when applicable.
- Encouraging development and dissemination of eco-friendly technologies.

### **Environmental impact of Business Partners' operations**

Where relevant, Business partners are expected to perform activities that aim to reduce their environmental impact,

including but not limited to:

- Waste reducing through recycling & reuse.
- Increase energy efficiency and their use of renewable energy.
- Water consumption and quality management.
- Biodiversity with an environmentally friendly infrastructure expansion.
- Reducing greenhouse gas emissions throughout the value chain.

### **Responsible sourcing of Minerals and metals**

Business partners are expected to ensure that they and their suppliers exercise due diligence within their operations to ensure that minerals and metals are responsibly sourced and traded.



# 3. Business Integrity

## CONDUCT BUSINESS RESPONSIBLY

### **Conflict of interest**

Consequently, the interest of Frauenthal Gnotec Group and/or the Business Partner on the one hand and the personal interests of their respective employees /or those of a relative, a friend, or a close relation) on the other hand must be kept separate.

### **Anti-corruption**

Frauenthal Gnotec Group's business partners shall never be complicit in any form of bribery or corruption. Never hint at, offer or ask for bribes and do not accept or pay bribes. Exceptions are business entertainment and giveaways of a minor value.

Ensure that all payments made by, directly or indirectly, now or later, are linked to an order and only pass to the Business Partner's company and no other party, with the exception of legitimate intermediaries.

If there is any doubt regarding the legitimacy of a proposal for payment or service to an individual manager/co- worker at a Business Partner's or a third party indicated by such a person, Business Partners are also expected to notify Frauenthal Gnotec Group in accordance with section 5 below, even if the request is denied.

In the case of Business Partners who draw up purchasing, production or assembly contracts at a third party, the same rules apply although conversely.

### **Fair competition**

Frauenthal Gnotec Group strives to act fair and responsible as a market participant and expects the same from its business partners.

Business partners shall never enter into any form of competition-limiting agreements with competitors regarding prices, discounts, quantities, customers, suppliers etc. Never co-ordinate actions with those of your competitors.

Avoid contact or discussions with competitors in matters that are sensitive from a competition point of view. Reject any attempt by your competitors to enter into such discussions.

### **Trade sanctions and export control**

Frauenthal Gnotec Groups business partners are required to comply with all trade sanctions that are applicable with Frauenthal Gnotec Group and with all relevant export control laws and regulations.

### **Protecting Frauenthal Gnotec Groups Confidential information and intellectual property**

Frauenthal Gnotec Group may share confidential information and/or intellectual property elements with its business partners in the course of their relationship.

Business Partners are required to handle Frauenthal Gnotec Group's confidential information in accordance with confidentiality provisions in place and in particular:

- protect Frauenthal Gnotec Groups confidential information from improper disclosure

- not to share Frauenthal Gnotec Group's confidential information with a competitor of Frauenthal Gnotec Group unless Frauenthal Gnotec Group has given their consent.

- Report in accordance with section 5 below any loss of, or unauthorized access (by an employee, officer or other who does not have a "need-to-know" or a third party) to Frauenthal Gnotec Group confidential information.

### **Data Protection**

Business Partners are required to comply with applicable data protection laws and regulations (also referred to as privacy laws) when processing Personal Data in relation to their business with Frauenthal Gnotec Group.

### **Personal Data**

"Personal Data" means all information relating to an identified or identifiable physical person ("registered"). An identifiable physical person is a person who can be identified, directly or indirectly. In addition, Business partners performing a processing activity on behalf of Frauenthal Gnotec Group are required to comply with the agreed upon specific



## 4. Audit Right

In addition to any audit right set out in any agreement entered into Frauenthal Gnotec Group, Business partners agree:

- that Frauenthal Gnotec Group (either directly or through an independent third party appointed for that purpose) may verify and assess their compliance with this Code by conducting an audit at any time, subject to prior written notice. If Frauenthal Gnotec Group reasonably believes that prior notice will interfere with Frauenthal Gnotec Group verifying whether the Business Partner has complied with its obligations or undertakings under the code, Business Partner will permit an audit without prior notice.
- to provide Frauenthal Gnotec Group with all relevant information and allow Frauenthal Gnotec Group and its representatives access to their premises for the purpose of performing such audit.

## 5. Grievance Channel and Cooperation

One of our values is Trust. Everyone working at, or with, Frauenthal Gnotec Group should be comfortable raising questions or concerns about any ethical issues or non-compliance. If you want to report your question or concerns, go to the reporting line by clicking on this link [gnotec.com/tell-us](https://gnotec.com/tell-us)

## 6. Consequences of violations

Business partners agree that a breach of any of their obligations or undertakings under this code is a material breach of contract, and may result in:

- the Business Partner having to take necessary remedies, including to pay damages and implementing appropriate corrective and preventive actions within a reasonable time, so as to remedy the violation and to prevent similar occurrences in the future; and
- Frauenthal Gnotec Group taking actions against the violation partner, up to immediate termination of the business relationship, upon written notice to the Business Partner.

