



Code of Conduct

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Introduction/Preamble

Nowotex GmbH & Co. KG is committed to ecologically and socially responsible corporate governance. We expect the same behaviour from all our suppliers. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into our corporate culture. Furthermore, we strive to continuously optimise our business activities and our products in terms of sustainability and ask our suppliers to contribute to this with a holistic approach.

The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the labour standards of the International Labour Organization and the United Nations Global Compact.

Social responsibility

Exclusion from forced labour

No forced labour, slave labour or work of a similar nature may be used. All work must be voluntary and workers must be able to leave work or employment at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment.

Prohibition of child labour

No child labour shall be used at any stage of production. Nowotex undertakes to comply with the recommendation from the ILO conventions on the minimum age for the employment of children. According to this, the age should not be less than the age at which compulsory education ends and in any case not less than 15 years. If children are found at work, the supplier shall document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers shall be protected and special protection rules shall be observed.

Fair Pay

The remuneration for regular hours and overtime must be equal to the national statutory minimum wage or the industry minimum standards, whichever is higher. The remuneration for overtime must in any case exceed the remuneration for regular hours. Insofar as the remuneration is not sufficient to cover the costs of ordinary living and to build up a minimum level of reserves, the supplier shall be obliged to increase the remuneration accordingly. Employees shall be granted all benefits prescribed by law. Wage deductions as punitive measures are not permitted. The supplier shall ensure that workers receive clear, detailed and regular written information on the composition of their remuneration.

Fair working time

Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is provided on a voluntary basis and does not exceed 12 hours per week, while employees must be given at least one day off after six consecutive working days. The weekly working time shall not regularly exceed 48 hours.

Freedom of association

The right of workers to form and join organisations of their choice and to bargain collectively shall be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of workers for the purpose of collective bargaining shall be provided. Workers' representatives shall be protected from discrimination. They shall be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

Prohibition of discrimination

Discrimination against employees in any form is inadmissible. This applies, for example, to discrimination on the basis of gender, race, skin colour, disability, political conviction, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

Health protection; safety at work

Health protection; safety at work

Nowotex is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the activity. In addition, employees are regularly informed and trained on applicable health and safety standards and measures.

Complaints mechanisms

Nowotex is responsible at the farm level for establishing an effective grievance mechanism for individuals and communities who may be affected by negative impacts. Even where legal systems are effective and well resourced, grievance mechanisms can offer particular advantages, such as rapid access and redress, reduced costs and transnational reach. Employees who raise a complaint for violations of this Code of Conduct or relevant laws shall not be subject to any form of disciplinary action.

Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company establishes processes in accordance with the Organisation for Economic Cooperation and Development (OECD) Guiding Principles on Due Diligence to Promote Responsible Supply Chains for Minerals from Conflict and High-Risk Areas and expects the same from its supplier. Smelters and refineries without adequate, audited due diligence processes should be avoided.

Ecological responsibility

Treatment and discharge of industrial waste water

Wastewater from operations, manufacturing processes and sanitary facilities should be typed, monitored, inspected and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

Dealing with air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions are to be typed, routinely monitored, reviewed and treated as necessary prior to release. Nowotex is also required to monitor its emission control systems and is encouraged to find economic solutions to minimise any emissions.

Handling waste and hazardous substances

Nowotex follows a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a hazard when released into the environment shall be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse and disposal.

Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of all kinds, including water and energy, shall be reduced or avoided. This is done either directly at the point of generation or through procedures and measures, e.g. by changing production and maintenance processes or procedures in the company, by using alternative materials, through savings, through recycling or with the help of the reuse of materials.

Dealing with energy consumption/efficiency

Energy consumption shall be monitored and documented. Economic solutions must be found to improve energy efficiency and minimise energy consumption.

Ethical business conduct

Fair competition

The standards of fair business, fair advertising and fair competition shall be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions in dealings with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to autonomously determine their prices and other conditions when reselling.

Confidentiality/data protection

Nowotex is committed to meeting the reasonable expectations of its principal, suppliers, customers, consumers and employees with respect to the protection of private information. Nowotex shall comply with data privacy and information security laws and government regulations in the collection, storage, processing, transfer and disclosure of personal information.

Intellectual property

Intellectual property rights shall be respected; technology and know-how transfers shall be made in a way that protects intellectual property rights and customer information.

Integrity/ Bribery, Taking Advantage

The highest standards of integrity must be applied in all business activities. Nowotex has a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be in place to ensure compliance with anti-corruption laws.

Scope, whistleblowing provisions and entry into force

This Code of Conduct is binding for all employees of Nowotex GmbH & Co. KG is binding. All employees of Nowotex GmbH & Co. KG are bound by the provisions of this Code of Conduct. Our managers have a special responsibility and are called upon to exemplify the described rules of conduct and values of Nowotex. Supervisors are responsible for serving as the first point of contact for their employees when they have questions about proper conduct in individual cases and for ensuring compliance with this Code in their area of responsibility. If an employee becomes aware of a violation of this Code of Conduct, the management or the personnel management must be informed immediately. We ensure that any information is treated confidentially and guarantee the whistleblower anonymity ("whistleblowing" provision).

We encourage our suppliers, service providers and business partners to also establish and follow a Code of Conduct.