

Code of Conduct	MEDEWO GRUPPE
No.: VO-00095	Status: published
Version: 1.00	Valid from: 11 June 2024

For the MEDEWO GROUP, sustainability is synonymous with long-term, responsible action that extends to our customers and business partners, our employees, society and the responsible use of natural resources. This Code of Conduct aims to create a common understanding of how these principles should be implemented in day-to-day business.

1 Environment

1.1 Energy Consumption, Greenhouse Gases & Waste

The MEDEWO GROUP is actively involved in minimising environmental impact by reducing energy consumption and waste. The development and expansion of an effective environmental management system supports us on our path to meeting these requirements and ensuring compliance with all relevant legal regulations.

1.2 Raw Materials & Chemicals/Customer Health & Safety

We strictly comply with the current chemical regulations and are committed to ensuring that all legal requirements regarding material compliance and product conformity are consistently adhered to. In the event of changes in the regulatory landscape, we react promptly and take the necessary measures to adapt our processes.

1.3 Environmental Services & Advocacy

The MEDEWO GROUP is continuously expanding its range of sustainable and resource-efficient products. In doing so, we attach great importance to promoting recyclability and the use of environmentally friendly and renewable raw materials in order to meet the identified requirements and interests of our customers.

1.4 Sustainable Procurement

We require our suppliers and their sub-suppliers to apply the same practices that we set out in our Code of Conduct. This includes complying with our standards in sustainable procurement and continuously monitoring their compliance to ensure a responsible supply chain.

2 Labour Law and Human Rights

2.1 Child Labour

Child labour is not tolerated in any form, neither in our company nor in our supply chain. We strictly adhere to the definition of ILO Convention 138, which prohibits child labour before universal compulsory schooling is completed and in any case under the age of 15. According to the ILO Convention 182, young people aged 15 to 18 are protected from work that could endanger their health, safety or morals.

2.2 Forced Labour and Minimum Standards of Employment

In accordance with ILO Conventions 29 and 105, we reject any form of forced or compulsory labour and do not accept it in our supply chain. All employees receive a written employment contract that complies with national laws and industry standards and clearly sets out details such as working hours, remuneration and termination regulations. Working hours comply with national and industry-specific standards. Adequate breaks and at least two days off per week are guaranteed.

	Role	Name	Date	Confirmation
Version created	Programme Management	Tobias Marxt	11 April 2024	

Code of Conduct	MEDEWO GRUPPE
No.: VO-00095	Status: published Valid from: 11 June 2024
Version: 1.00	

2.3 Working Conditions and Employee Health

The MEDEWO GROUP and its suppliers are obliged to comply with all legal requirements regarding working conditions and employee health. This includes regulations on working hours and breaks in accordance with national laws and ILO standards. A safe and ergonomic working environment is guaranteed and employees are regularly given health and safety training.

2.4 Social Dialogue

The MEDEWO GROUP is committed to promoting social dialogue and ensuring open communication within the company. Through regular information meetings, the use of OPEX boards, and a wide range of advanced vocational training offers, we strengthen the efficiency and effectiveness of our shared internal discourse. Our process and document management programme allows each employee to submit their own suggestions for improvement, which promotes continuous progress in work processes. In addition, our whistleblower system ensures that employees can confidentially highlight grievances, which further strengthens transparency and integrity throughout the company. Operationally, the introduction of the HR Business Partner Model has made a significant contribution to strengthening and effectively supporting our employees.

2.5 Career Management & Training

We actively promote the career management and professional development of our employees. Our continuing education programmes are results-orientated and focus on the development of a positive communication culture and of leadership skills. This is supplemented by a digital learning management system that provides a variety of learning content, both internally created and externally sourced. To support personal and professional development, we ensure that sufficient time is available for advanced vocational training. The processes for onboarding, offboarding and reboarding are continuously optimised to allow employees a seamless transition in the event of changes within their professional career.

2.6 Equality and Preventing Discrimination

Discrimination of any kind is prohibited both in our company and throughout the supply chain. All employees must be treated equally and fairly, regardless of race, colour, gender, religion, political or other opinion, national or social origin, asset status or other characteristics in accordance with ILO Conventions 100 and 111.

2.7 Freedom of Association and Right to Collective Bargaining

We respect the freedom of association and the right to collective bargaining and ensure that employees do not experience discrimination or punishment in the exercise of these rights.

3 Ethics and Conflicts of Interest

3.1 Legal Compliance

We are committed to complying with all applicable laws and regulations in the countries in which we do business. This also includes the respective standards, rules of conduct, and any voluntary declarations. These standards also apply to our suppliers. Our commitment includes strict compliance with all relevant trade sanctions and embargoes applicable to our business relationships.

	Role	Name	Date	Confirmation
Version created	Programme Management	Tobias Marxt	11 April 2024	

Code of Conduct	MEDEWO GRUPPE
	Status: published
No.: VO-00095	Valid from: 11 June 2024
Version: 1.00	

3.2 Business Integrity

Any form of corruption, bribery, extortion, embezzlement and money laundering are prohibited and may not be practised or tolerated by us or by business partners.

All types of corruption, such as in particular bribery and "sweeteners" offered to decision-makers, will be rejected by us and are neither actively nor passively tolerated. We do not influence the employees of our business partners by offering favours and do not allow ourselves to be influenced in this sense. Employees are only allowed to accept hospitality within a customary scope and symbolic gifts appropriate to the circumstances. Under no circumstances can this include money, loans, commissions or similar monetary benefits, regardless of their amount.

3.3 Confidential Information and Data Protection

The MEDEWO GROUP attaches the highest priority to the security and protection of personal and business data. We are committed to strict compliance with the General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG) and the data protection laws of the federal states by taking all necessary technical and organisational measures.

In addition, our business partners are obliged to protect the intellectual property and all confidential information, including the personal data collected, stored and processed by or for the MEDEWO GROUP, in accordance with the applicable legal or contractual regulations.

3.4 Trade Compliance

All export and import control regulations and all other applicable commercial and customs regulations, in particular applicable law on sanctions programmes and economic embargoes, are complied with by the MEDEWO GROUP and must be complied with by our business partners.

Michael Villiger, Managing Director

	Role	Name	Date	Confirmation
Version created	Programme Management	Tobias Marxt	11 April 2024	