



Code of Conduct – Business Partners

Revision 02

Scope

Our business activities are guided by the principles of environmental protection, sustainability, social responsibility, and ethics. This responsibility includes an ecological, ethical, and social corporate governance that we expect not only from ourselves and our employees but also from our business partners. It is our aim to integrate and embody these principles within the corporate culture. We support our business partners in obtaining ESG certification according to Smeta or amfori BSCI.

Social Responsibility Towards People

CLARUS Films GmbH expects its business partners to uphold human dignity and respect all human rights, including labor rights. This specifically requires:

Forced Labor

There must be no forced labor, slave labor, or any similar form of oppression in the company. This includes ensuring that all employment relationships are voluntary and can be terminated at any time with the agreed notice period. This also encompasses unacceptable physical and psychological disciplinary treatments, such as threats of physical violence, sexual harassment, or the retention of personal documents for residency permits.



Child Labor

Our business partners must particularly protect the rights of young workers in every corporate process and comply with explicit protection regulations, such as the Youth Protection Act. The physical, mental, and emotional development of the employee must not be impaired or endangered at any time. Business partners are expected to adhere to the recommendations of the ILO Conventions regarding the minimum age for employment. Accordingly, the age at the beginning of employment should not be lower than the age at which compulsory schooling ends, and in any case, not under 15 years.

Remuneration

The Code of Conduct requires that the remuneration paid meets the national legal minimum wage or industry standards, whichever is higher, ensuring a dignified life for the employee and their families. The remuneration must be paid in full and on time on the agreed pay date in the local currency. The amount should be commensurate with the employee's level of education and experience. The business partner must ensure that the remuneration covers both regular working hours and overtime. Applicable collective agreements must be adhered to, including those relating to wages, overtime, and allowances. All legally mandated benefits must be provided to the employee. Discrimination through wage reductions and other compensation practices or wage deductions as a disciplinary measure are not permitted.

Working Hours

Working hours must comply with applicable laws or industry standards regarding regular hours, overtime, breaks, and vacation time, as well as parental leave and maternity protection. Overtime is only permitted if it is voluntary and not forced. Overtime compensation is mandatory. Employees must be granted at least one day off after six consecutive working days. The weekly working hours should not regularly exceed 48 hours.

Freedom of Association

The business partner must grant employees the right to form, join, and engage in collective bargaining with organizations of their choice, as long as they comply with legal regulations. Restricting or discriminating against participating employees and worker representatives is not allowed. It is prohibited to deny worker representatives access to their colleagues and workplace.



Prohibition of Discrimination

CLARUS Films GmbH expects its business partners to treat employees with respect and dignity. Privacy in daily operations and data collection must be respected. Any form of employee discrimination must be immediately stopped. This includes, but is not limited to, discrimination based on gender, origin, race, skin color, disability, social background, political beliefs, religion, age, sexual orientation, family responsibilities, or union membership. Favoritism based on these reasons is also prohibited.

Occupational Health and Safety

Business partners are expected to create a safe workplace and a healthy working environment. Necessary precautions against accidents and health hazards must be taken by establishing and implementing appropriate occupational safety measures and adhering to applicable accident prevention regulations. Regular training, instruction, and drills, such as evacuation and fire protection exercises, should be conducted by qualified personnel. Employees must be provided with personal protective equipment appropriate for their workplace at no cost. Special protection must be given to particularly vulnerable employees, such as young workers, pregnant women, and individuals with physical or mental disabilities, in accordance with legal requirements. Access to sufficient clean drinking water and hygiene facilities must be ensured at all times.

Complaint Management

Establishing and implementing a complaint management system is part of the Code of Conduct. Individuals and groups must be able to discuss negative aspects respectfully and confidentially at any time. The option for anonymity must be highlighted. The complaint mechanism must be easily accessible and trustworthy. Disciplinary actions against the reporting person or group are strictly prohibited.



Ecological Responsibility Towards the Environment

Environmental Protection, Sustainability, and Circular Economy

We strive to minimize environmental impacts. Compliance with applicable regulations is a given for us, and we expect the same from our suppliers. Our suppliers are committed to the efficient use of raw materials, water, energy, and other natural resources while simultaneously minimizing waste and emissions, thereby contributing to the protection of the environment and the climate.

Additionally, we support the circular economy in the packaging industry. We use packaging materials that are 100% recyclable and include recycled content.

Consumption of Raw Materials

The use and consumption of raw materials during production, including energy and water, must be minimized to the necessary extent. Environmental aspects and the sustainability of the product should be considered in all business actions.

Environmentally friendly packaging and transport alternatives should be explored and applied where possible. Packaging is considered environmentally friendly if it is reusable, uses minimal material, is recyclable, and is made from secondary raw materials.

Waste Prevention

The management of waste should follow the principle of "Prevention – Recovery – Disposal." The company should strive to reduce the amount of waste for disposal by making changes to production processes, using alternative materials, recycling, or reusing materials. When disposing of waste, it is important to comply with applicable rights and laws.

Energy Efficiency

Reducing energy consumption and employing energy-saving measures efficiently should be defined as both an economic and ecological objective. CLARUS Films GmbH supports the implementation of an energy management system.

Hazardous Substances

We expect responsible chemical management and compliance with regulations regarding substance restrictions.



Ethical Responsibility Towards Society

Competitive Behavior

CLARUS Films GmbH expects fair competition behavior from its business partners in the open market. Compliance with the applicable antitrust laws, which govern interactions with competitors, including agreements or activities related to pricing, market allocation, and production limitations, is to be observed.

Data Protection

The Code of Conduct includes provisions stating that both private and business-related information must be protected in accordance with current laws and not disclosed to third parties in violation of data protection regulations. Business partners are required to implement internal measures for information security and data protection when collecting, storing, processing, transmitting, and disclosing personal and business data.

Intellectual Property

Business partners are required to respect the intellectual property rights of CLARUS Films GmbH and other third parties. When collaborating with subcontractors, no exchange of information shall occur without the consent of CLARUS Films GmbH. Knowledge-sharing and technology transfers must be conducted in a manner that protects ownership rights and customer data.

Integrity – Anti-Corruption

All business partners are obligated to adhere to the highest standards of integrity. A zero-tolerance policy must be followed regarding bribery, corruption, extortion, embezzlement, and misappropriation in any form. Compliance with integrity laws applicable in the respective countries is mandatory. The supplier must be able to demonstrate the origin of its raw materials at all times through transparent records.

Gifts and invitations are only permissible if they do not intend to influence the business relationship or jeopardize the independence of the business partner. Cash payments are rejected regardless of their value and are considered attempts at bribery by us. Please refer to our Compliance Policy for further details.



Conflict of Interest

Business decisions are exclusively based on objective criteria and are not influenced by relationships or personal interests. If a conflict of interest arises, it must be communicated in advance to avoid any potential issues.

Implementation of the Code of Conduct

CLARUS Films GmbH views the review of standards as a continuous, dynamic process that offers ongoing potential for improvement. The Code of Conduct is regularly reviewed to ensure it meets current requirements, at least every 5 years.



Inquiries and Reporting Violations

If you wish to report any violations related to the requirements outlined in this Code of Conduct, you can access the digital whistleblower system via the following link on the internet:

<https://clarusfilms.integrityline.com/>

For inquiries regarding the present Code of Conduct, you can contact our representative, Mr. Reiner Schuster, using the following contact information:

CLARUS Films GmbH
Albert-Einstein-Str.11
63128 Dietzenbach
Telefon: +49 6074 – 8210 15
E-mail: schuster@clarus-films.com

Dietzenbach, 01. Februar 2024

N. Thom – CEO

A handwritten signature in blue ink, appearing to read 'Norman Thom'.

M. Mondani - COO

A handwritten signature in blue ink, appearing to read 'M. Mondani'.



Please fill out the following confirmation, sign it and send it back to the following e-mail address:

Gelhaus@clarus-films.com

We hereby confirm compliance with and implementation of this Code of Conduct of CLARUS Films GmbH

Company: _____

Name: _____

Position in the company: _____

City, Date: _____

Signature

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