



Our Code of Conduct

Valid for alseda and its affiliated companies
as well as all business partners

1 FUNDAMENTAL

The principle: responsible and lawful conduct

Responsible and lawful conduct is firmly anchored in our company and forms the basis for our corporate success. Our business partners are obliged to comply with the laws of the applicable jurisdiction(s). The requirements of the Supplier Code of Conducts are to be promoted and demanded as best as possible both in our own company and along the entire supply chain.

alseda takes data protection into account when dealing with personal data of its customers, employees and business partners. The data protection officer of alseda supports the specialist departments in this respect. Personal data is only collected, processed or used if this is legally permissible.

alseda Consulting
Frank Bergmann
(Managing Director)

For reasons of easier readability, gender-specific differentiation, e.g., co-workers, has been omitted. For the sake of equal treatment, the corresponding terms are gender neutral.

2 DEALING WITH EACH OTHER

2.1 RESPECT AND OBSERVANCE OF HUMAN RIGHTS

We expect our business partners to act in accordance with humane and fair working conditions. The principles of the United Nations Universal Declaration of Human Rights and the applicable core labor standards of the International Labor Organization (ILO) are recognized, and the minimum criteria described in the ETI-Base Code (Ethical Trading Initiative) are observed.

2.2.1 THE EMPLOYMENT RELATIONSHIP IS FREELY CHOSEN

Any form of forced labor, servitude, involuntary prison labor or human trafficking is prohibited. Employees are free to leave their employer after reasonable notice.

2.2.2 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

Employees have the right, without exception, to assemble and form a union of their own choosing and to bargain collectively. Employee representatives are not discriminated against and have the opportunity to carry out their representative functions in the workplace.

2.2.3 WORKING CONDITIONS ARE SAFE AND HYGIENIC

A safe and hygienic working environment shall be provided, considering generally accepted knowledge of the industry and specific hazards. Appropriate measures shall be taken to prevent accidents and damage to health arising out of, in connection with, or as a result of the work by minimizing, as far as reasonably practicable, hazards associated with the work environment. Workers shall receive regular and recorded health and safety training. Access to clean toilet facilities and potable water and, where appropriate, food storage facilities shall be provided. Accommodation, when provided, shall be clean and safe, and shall meet the basic needs of workers.

2.2.4 NO CHILD LABOUR IS USED

There is no use of child labor as defined by ILO and UN conventions and/or national law. The minimum age for employment of minors is not below the applicable age of compulsory education and is at least 15 years, unless ILO exemptions apply. The right of children to education is respected. Children and adolescents under the age of 18 are not employed at night or in hazardous conditions.

2.2.5 THERE IS A REGULATED EMPLOYMENT RELATIONSHIP

Before entering an employment relationship, the employee must be provided with understandable information about their rights, responsibilities, working conditions

and wages. As far as possible, the work performed shall be based on the recognized working relationship established by national legislation and practice. Obligations to employees arising from labor or social security laws and regulations regarding regular employment relationships will not be circumvented, e.g., through excessive use of fixed-term employment contracts, subcontracting or other employment relationships.

2.2.6 MINIMUM WAGES ARE PAID

Wages shall be paid on time, regularly and in full. Deductions from wages as disciplinary measures shall not be permitted, nor shall deductions from wages not permitted by national legislation be made without the express consent of the employee concerned. All disciplinary actions shall be recorded.

2.2.7 THE WORKING TIME IS NOT EXCESSIVE

Working hours are in accordance with national legislation and the industry standard, depending on where the greater protection is provided. Working hours, excluding overtime, are fixed by contract and may not exceed 48 hours per week. Overtime should be voluntary and limited in time. Overtime should always be compensated with overtime pay. This should not be less than 125%. The total number of hours worked over a 7-day period should not exceed 60 hours. Exceptions to this are only permitted in exceptional circumstances, which are listed in detail in ETI-Base Code item 6.5. In a period of seven days, workers are entitled to at least one day off, where permitted by national law, two days off for a period of 14 working days.

2.2.8 DISCRIMINATION IS NOT PRACTICED

There is no discrimination in hiring, compensation, admission to training, promotion, termination of employment or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

2.2.9 INHUMAN OR BRUTAL TREATMENT IS NOT ALLOWED

Physical abuse or discipline, threats of physical abuse, sexual or other harassment, and verbal abuse or other forms of intimidation are prohibited.

2.2 LIABILITIES TO BUSINESS PARTNERS

In addition to the fundamental legality, we also pay attention to the fulfillment of other obligations, e.g., contractual or company law obligations, in the provision of services.

2.3 CUSTOMER PROCUREMENT PROCESSES AND PROCUREMENT LAW REGULATIONS

We comply with the procedures that our customers have provided for the award of contracts, as well as with the rules and regulations of public procurement law. We do not influence the bidding process through unfair behavior, e.g., by receiving or using sensitive data and information about competitors' bids or by demanding preferential treatment. Contracts may not be motivated by personal material or immaterial benefits. All information and representations in the offers must be correct.

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3 ENVIRONMENT

Negative environmental impacts during production and transport of the products are to be continuously reduced. This includes at least the careful use of energy and water resources, waste and wastewater management, the careful handling of hazardous substances, the reduction of greenhouse gas emissions, the protection of biodiversity and the protection of forests. The valid legal environmental regulations and industry standards are complied with.

4 COMPLIANCE

In order to avoid conflicts of interest, any kind of corruption, extortion, embezzlement and bribery is unacceptable to us. This includes promising, offering and accepting any kind of gifts and gratuities.

If you have any questions or tips, please speak to our Anti-Corruption Officer, who will treat the identity of whistleblowers with confidentiality. Contact details can be found on our website under "Compliance".

We expect our business partners to have accurate information about their operations, structure and performance and to disclose it in accordance with applicable regulations and industry standards.

5 COMPLAINTS MECHANISM

A system shall be established for the confidential reporting of violations of these guidelines or laws. The protection of whistleblowers against disadvantages such as reprisals shall be ensured.

alseda Consulting
Gerbermühlstraße 9
60594 Frankfurt am Main
Germany

Phone: +49 69 2648468-0
infomail@alseda.com
www.alseda.com