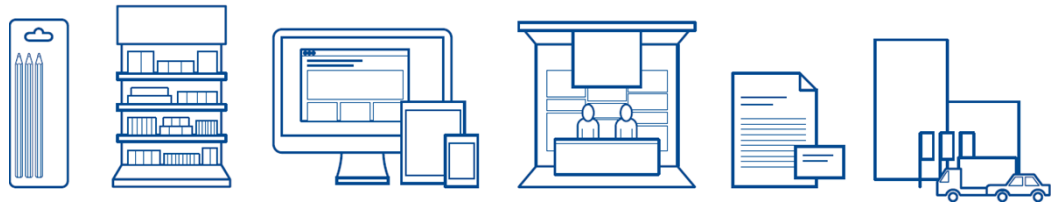




STAEDTLER®

Guideline



Business Partner Code of Conduct

PART I - Taken from the International Standard: ETI Base Code

1. The employment relationship is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. No child labor is used
5. Minimum wages are paid
6. The working time is not excessive
7. Discrimination is not practised
8. There is a regulated employment relationship
9. Inhumane or brutal treatment is not permitted

PART II - In addition to the Standard Base Code to comply with the Supply Chain Sourcing Obligations Act

10. Destruction of the natural basis of life through environmental pollution
11. Unlawful infringement of land rights
12. Contracting or using private or public security forces
13. Minamata Convention on Mercury
14. Production and use of persistent organic pollutants
15. Import and export of hazardous waste
16. Fight against corruption
17. Complaints management | Whistleblower system

Part III - Relevant International Standards and Guidelines

PART I - Taken from the International Standard: ETI Base Code

The ETI Base Code is based on the International Labour Organisation (ILO) Conventions and is an internationally recognised code of good labour practice. It is considered a global reference standard and is often used as a benchmark for conducting social audits and developing ethical trade action plans.

The provisions of the Basic Code represent minimum and not maximum standards. Companies applying this Code are expected to comply with national and other applicable laws. Where the law and the Basic Code address the same issue, companies are expected to apply the provision that provides the greater protection to workers.

Versions of the ETI base code are available in English, Arabic, Burmese, French, Greek, Hindi, Italian, Lithuanian, Polish, Romanian, Spanish, Telugu, Urdu, Albanian, Bengali, Chinese, German, Hebrew, Hungarian, Kannada, Malay, Portuguese, Russian, Tamil, Turkish and Vietnamese: <https://www.ethicaltrade.org/resources/eti-base-code>

1. The employment relationship is freely chosen

1.1

There shall be no forced labour, involuntary servitude or involuntary prison labour.

1.2

Workers will not be required to leave a "deposit" or their identification documents with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

2.1

Workers shall have the right, without exception, to assemble and form a trade union of their own choosing and to bargain collectively.

2.2

The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3

Workers' representatives shall not be discriminated against and shall have the opportunity to carry out their representative functions in the workplace.

2.4

Where the right to organise and bargain collectively is restricted by legislation, the employer shall facilitate and not impede the development of equal means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

3.1

A safe and hygienic working environment shall be provided, taking into account generally accepted knowledge of the industry and specific hazards. Reasonable measures shall be taken to prevent accidents and injury to health arising out of, in connection with, or by reason of the work by minimising, so far as is reasonably practicable, hazards inherent in the working environment.

3.2

Workers shall receive regular and recorded health and safety training. This training shall be repeated for new or re-employed workers.

3.3

Access to clean toilet facilities and potable water and, where appropriate, food storage facilities should be provided.

3.4

Accommodation, if provided, shall be clean, safe and meet the basic needs of workers.

3.5

The company complying with the Guidelines shall assign responsibility for health and safety to a representative of senior management.

4. No child labor is used

4.1

There shall be no use of child labour.

4.2

Enterprises shall develop or participate in policies and programmes that provide for the transfer of a child found performing child labour to quality education and for his or her retention in the same until the end of childhood. "Child" and "child labour" are defined in the annexes.

4.3

Children and young people under the age of 18 are not employed during the night or in hazardous conditions.

4.4

These policies and procedures shall be consistent with the provisions of the relevant ILO standards.

5. Minimum wages are paid

5.1

Wages and allowances paid for a regular working week shall be at least in accordance with national legal requirements or the industry standard, whichever is higher. In any case, wages shall always be sufficient to cover basic needs and provide some disposable income.

5.2

All workers shall receive written and comprehensible information on working conditions in relation to wages before they start work and on wage details for the relevant reference period each time they are paid.

5.3

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 worker concerned. All disciplinary measures shall be recorded.

6. The working time is not excessive

6.1

Working hours are in accordance with national legislation and the industry standard and subsections 6.2 to 6.6 below, depending on where the greater protection is provided. Subsections 6.2 to 6.6 are based on international labour guidelines.

6.2

Working hours, excluding overtime, must be fixed by contract and may not exceed 48 hours per week*.

6.3

Overtime shall be voluntary. All overtime must be used on a responsible basis and respect the following: the amount, frequency and hours worked by individual workers and the workforce as a whole. Overtime shall not be used as a substitute for regular employment. Overtime is always compensated with an overtime premium, and it is recommended that this should not be less than 125% of the regular wage.

6.4

The total hours worked over a seven-day period shall not exceed 60 hours, unless covered by subsection 6.5.

6.5

The total hours worked over a seven-day period may exceed 60 hours only in exceptional circumstances where all of the following apply:

- this is permitted by national law
- this was decided in a collective agreement negotiated on a free basis with a workers' organization,
- where the organisation represents a significant part of the workforce
- adequate safety measures have been put in place to protect the health and safety of workers and
- the employer can prove that exceptional circumstances exist, such as unexpected production peaks, accidents or emergencies.

6.6

All workers shall enjoy at least one day off in a seven-day period or, where permitted by national law, two days off for a period of 14 working days.

*International standards recommend the progressive decrease of standard working hours, where appropriate, to 40 hours per week, without reducing workers' wages, while working hours are reduced.

7. Discrimination is not practised

7.1

There shall be no discrimination in hiring, compensation, admission to training, promotion, termination of employment or retirement on the basis of race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, trade union membership or political affiliation.

8. There is a regulated employment relationship

8.1

The work performed shall be carried out, as far as possible, on the basis of the recognised working relationship established by national legislation and practice.

8.2

Obligations to workers arising from labour or social security law and regulations concerning regular employment are not avoided by the use of employment-only contracts, subcontracting or home-based work, or by training plans without the intention of providing skills or regular employment, nor are such obligations intended to be circumvented by the excessive use of fixed-term employment contracts.

9. Inhumane or brutal treatment is not permitted

9.1

Physical abuse or discipline, threats of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited. The provisions of this Code set minimum standards, not maximum requirements, and should not be used to prevent companies from improving these standards. Businesses applying this Code are expected to comply with national and other applicable laws and, where the provisions of the legislation and the Base Code address the same issues, to apply the provisions that provide the greater protection.

PART II - In addition to the Standard Base Code to comply with the Supply Chain Sourcing Obligations Act

10. Destruction of the natural basis of life through environmental pollution

Causing harmful soil change, water pollution, air pollution, noise emission or excessive water consumption is prohibited if the natural basis for the preservation and production of food is significantly impaired, a person is denied access to safe drinking water, a person's access to sanitary facilities is impeded or destroyed or a person's health is harmed.

11. Unlawful infringement of land rights

Unlawful eviction and the unlawful taking of land, forests and waters shall be excluded. The term "deprivation" is to be understood broadly and includes all cases of acquisition, construction or other use of land, forests and waters.

12. Contracting or using private or public security forces

Companies must ensure that private or public security forces respect human rights in their activities and that no human rights violations are committed in the performance of their duties due to a lack of training or control. Such serious human rights violations include torture, cruel, inhuman or degrading treatment, injury to life and limb or interference with the freedom of association.

13. Minamata Convention on Mercury

The Minamata Convention concerns the relevant handling of mercury. The Convention aims to protect people and the environment from the release of mercury and mercury compounds into air, water and soil.

14. Production and use of persistent organic pollutants

The production and use of chemicals of the POP Convention, also known as the "Stockholm Convention on Persistent Organic Pollutants" is prohibited. The substances mentioned there mainly include insecticides. This also applies to the non-environmentally sound handling, collection, storage and disposal of waste containing POPs.

15. Import and export of hazardous waste

The export of hazardous waste in accordance with the Basel Convention regulations is prohibited.

16. Fight against corruption

Corruption in all its forms, including extortion and bribery, is prohibited.

17. Complaints management | Whistleblower system

<https://staedtlermars.integrityline.org/>

Our whistleblower system offers the possibility to anonymously make information about illegal behaviour transparent. The system is provided by an external service provider to protect the anonymity of the whistleblower.

Part III - Relevant International Standards and Guidelines

This Code of Conduct complies in particular with the following international standards and guidelines:

- Ethical Trading Initiative Base Code
- 10 Principles of the United Nations Global Compact
- Universal Declaration of Human Rights of the United Nations (UN)
- Conventions and Recommendations of the International Labour Organization (ILO)
- UN Guiding Principles on Business and Human Rights (UNGPR)
- OECD Guidelines for Multinational Enterprises
- UN Principles on Children's Rights and Business
- Sector-specific OECD guidelines
- Supply chain due diligence (LkSG) and EU supply chain requirements (CSDDD)

General

We call on the management of our suppliers to commit to acting accordingly. STAEDTLER will consistently pursue violations of this Business Partner Code of Conduct and take appropriate measures. STAEDTLER reserves the right to terminate the business relationship as a final consequence. Furthermore, we expect our business partners to work towards ensuring that their business partners also comply with these principles.