

Nölken Hygiene Products GmbH

Sustainability Code

for our business partners

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1. Scope

This sustainability code is the basis of the joint business relationship. It applies to our direct business partners as well as to the subcontractors commissioned by the direct business partners who are involved in the production of Nölken products and our customers' products, as well as to all links in the production and value chain. The business partners ensure compliance with and monitoring of the principles of the sustainability code across the entire value and production chain.

2. Behavior in a Business Environment

The business partner agrees to comply with the applicable national laws in all business activities and decisions and respects the relevant internationally recognized norms, guiding principles, in particular the principles of the United Nations Global Compact, the Universal Declaration of Human Rights, the conventions of the United Nations Organization and the core labor standards of the International Labor Organization (ILO) as well as the OECD Guidelines for Multinational Enterprises. In addition, it is expected that the business partner adheres to his internal company guidelines and voluntary commitments.

Compliance with this sustainability code and the above standards must not be circumvented by means of ancillary agreements, such as contractual agreements or comparable measures.

3. Social Responsibility

Nölken Hygiene Products is committed to complying with labor and social standards and supporting ethical business practices. Ethical principles are firmly anchored in our corporate strategy and we pursue the specific goal of aligning our company and our value chain in a socially responsible manner.

National laws and internationally binding requirements as well as national and international industrial standards apply in the production facilities. In addition, the existing production and working conditions there must be in accordance with the ILO conventions, the UN Global Compact, the OECD guidelines and the general declaration of human rights of the United Nations. Instruments for the management of social aspects must be integrated.

If products or preliminary products are manufactured outside the European Economic Area, our business partners also have a current social standard certificate (e.g. OHSAS 18001, BSCI, SA 8000, or comparable) for themselves and for all those upstream of them in the supply and production chain for locations outside the European Economic Area.

3.1. Working Conditions

3.1.1. Health and Safety

It is important to Nölken to prevent accidents at work and work-related illnesses. This serves the well-being and satisfaction of the employees and at the same time makes a decisive contribution to the success of the company.

We expect our business partners to ensure a safe, healthy and hygienic working environment and to take the necessary measures to avoid accidents and damage to health that may arise in connection with the activity. Internationally recognized occupational safety standards must be respected. In addition, the business partner supports continuous improvement of the working environment and attaches importance to safety-promoting measures.

3.1.2. Working Hours

The working hours must comply with the applicable national law, industrial standards and the relevant ILO conventions.

3.1.3. Wages and Benefits

The business partner guarantees that the wages paid to the employees correspond at least to the legal or the minimum wage prescribed in the industry. In addition, social benefits must be provided that correspond to the respective national or local standards.

3.1.4. Training and Qualification

If possible, the skills of the employees are to be promoted at all levels through suitable training and further education measures.

3.1.5. Grievance mechanism

Business partners must ensure that effective grievance mechanisms are in place for individuals and communities that may be adversely affected at the operational level across the entire supply and production chain. Employees who make a complaint based on this Code and / or applicable national / international law shall not be subject to any form of disciplinary or retaliatory action.

Critical questions, concerns and complaints are always heard at Nölken. We ensure that all reported concerns are followed up. We strive for an appropriate remedy by the responsible body. If you would like to draw Nölken's attention to human rights violations in the value chain or if you have human rights complaints in connection with Nölken, you can contact us at the following address: beschwerde@noelken.de

3.2. Human rights and Fundamental rights

The business partner respects and supports the observance of human rights (see Universal Declaration of Human Rights of the United Nations).

3.2.1. Prohibition of child labor

The exploitation of children and young people will not be tolerated. The business partner observes the regulations of the United Nations on human and children's rights and undertakes in particular to comply with the Convention on the Minimum Age for Admission to Employment (Convention 138 of the International Labor Organization) and the Convention on Prohibition and Immediate Measures to Eliminate the Worst Forms of Child Labor (Convention 182 of the International Labor Organization). If a national regulation regarding child labor provides for stricter standards, the supplier has to adhere to these as a matter of priority.

3.2.2. Dealing with Forced Labor

Any form of forced or compulsory labor will not be tolerated. This means that the business partner does not use any work performed involuntarily under threat of punishment, including forced overtime, debt bondage, prison labor, slavery or physical bondage. The business partner also obligates to undertake action against forced and compulsory labor.

3.2.3. Freedom of association and the right to collective bargaining

The business partner respects the fundamental right to freedom of association and the right to collective bargaining within the framework of national laws and ensures that these are not impaired.

In the event that national standards restrict the right to organize and the right to collective bargaining, the business partner should work towards ensuring that the free and independent association of employees for the purpose of conducting negotiations is made possible and is permitted.

3.2.4. Disciplinary action and dealings with employees

Nölken expects business partners to treat their employees with dignity and respect. Sanctions, fines, other penalties or disciplinary measures may only be implemented in accordance with applicable national laws and internationally recognized human rights.

The business partner ensures that no employee is exposed to verbal, psychological, sexual and / or physical violence, coercion or harassment.

3.2.5. Dealing with Discrimination

It is expected that the equal treatment of all employees is an essential principle of the corporate policy of the business partners. The business partner refrains from any form of discrimination, for example on the basis of ethnic, national and social origin, skin color, gender, age, religion and worldview, political activity, membership in an employee organization, disability, sexual orientation or other personal characteristics. The business partner undertakes to maintain equal employment opportunities. The respective legal regulations apply.

4. Environmental Protection

Nölken Hygiene Products wants to use energy and resources efficiently and minimize environmental pollution. Compliance with all relevant regulations and laws with regard to environmental and animal protection is a matter of course for Nölken Hygiene Products. Together with our business partners, we would like to strive for an environmentally friendly value chain.

4.1. Environmental and Climate Protection

The protection of the environment is part of our understanding of sustainability. We expect our business partners to minimize environmental pollution, to observe environmental and climate protection with regard to applicable international standards and legal requirements and to continuously improve them. This includes avoiding emissions and waste, as well as taking steps to increase resource efficiency. To this end, suitable and comprehensible measures must be taken and management systems (e.g. in accordance with ISO 14001, or comparable) operated in order to ensure and promote the protection of the environment and the climate.

Nölken expects its business partner to develop and manufacture products safely and in an environmentally friendly manner, as well as their packaging and transport. Responsible and efficient use of resources is a prerequisite for all phases of the value chain. The consumption of resources is to be optimized continuously.

If products or intermediate products are manufactured outside of the European Economic Area, our business partners must also present a current environmental certificate to Nölken for themselves and for everyone in the supply and production chain for the locations outside the European Economic Area.

At Nölken, we determine the greenhouse gas emissions that we cause as part of our core business in order to reduce them. We are committed to the use of renewable energy sources. We expect our business partners to make an active contribution to limiting global warming. To this end, we expect our business partners to examine procurement, manufacturing and delivery processes with regard to the effects on the climate and to derive measures for reduction.

4.2. Waste and Emissions

It is expected that the business partner maintains procedures and systems that ensure the safety of the handling, transport, storage, recycling, reuse and management of raw materials and waste. Any generation or disposal of waste and any release of substances into the air or water that could have negative effects on human health or the environment must be reduced as far as possible and the substances handled, controlled and / or treated appropriately before they are released into the environment. The business partner is required to prevent or minimize accidental or diffuse leakage or the release of pollutants into the environment through appropriate processes and systems. It is expected that the

business partner maintains processes and systems that optimize the use of all relevant resources such as energy, water and raw materials on a sustainable basis.

The central point for the development of our products is the promotion of the circular economy. The recyclability of the packaging and products plays a decisive role here. The aim is to make all packaging recyclable. When evaluating, we are guided by the currently valid and recognized German and European standards and guidelines.

4.3. Animal welfare

Compliance with animal welfare standards in animal husbandry is important to us. Insofar as animal products or animal preliminary products are contained in the Nölken products, the business partner must ensure that these come from species-appropriate and sustainable animal husbandry and that the animal welfare requirements are met in accordance with the requirements of the European Union.

Under no circumstances may animal experiments be carried out or commissioned for the products, unless this is required by law.

5. Implementation of the requirements

We expect our business partners to respect the above-mentioned requirements and integrate them into company management, identify risks in relation to supply chains and take appropriate measures. In the event of suspected violations and to protect supply chains with increased risks, the business partner will inform Nölken promptly and, if necessary, regularly about the identified violations and risks as well as the measures taken. The business partners are also obliged to disclose information correctly and comprehensively as part of a self-assessment, to inform subcontractors and upstream suppliers about this sustainability code and to ensure compliance. Furthermore, to guarantee access for audits at all times.

Compliance with the regulations in the code of conduct is confirmed:

Name:

Function:

Place and Date:

Signature and Company stamp: