

Code of Conduct

The employees working at Wilhelm Grillo Handelsgesellschaft mbH and its affiliated companies¹ are committed to the example of Herbert Grillo and thus to the tradition of the honorable merchant.

The strict adherence to law and legislation is a matter of principle to us. We also expect our business partners to respect and comply with applicable national laws and regulations throughout the entire value chain.

We understand sustainability as an essential part of our business strategy and encourage our business partners to jointly develop and improve innovative solutions for a sustainable future.

The following Code of Conduct is based on the recognized conventions of the International Labor Organization (ILO) as well as the relevant standards of the United Nations and is a fundamental part of our principles for all kind of business relationships.

Although the cultural and political backgrounds of our business partners may differ from our own standards, we strongly believe in a common basis with regard to social and environmental principles and incorporate them into our daily decisions and behavior.

Where national law is more stringent than the requirements of our Code of Conduct, national law will apply in any case.

We reserve the right to undertake consequences if serious violations of our Code of Conduct are identified.

Wilhelm Grillo Handelsgesellschaft mbH

¹ Grillo Altmittel GmbH, Wilhelm Grillo Handelsgesellschaft mbH (Tattendorf), Metallschmelze Tattendorf GmbH

Code of Conduct - Ethical understanding and expectations towards our business partners

The essential values of our basic ethical understanding and the expectations we have towards our business partners include the following:

HUMAN RIGHTS

Our business partners are required to respect the fundamental human rights of all employees and to treat them with dignity, respect, and fairness. This applies to all forms of employment.

NO CHILD LABOUR

According to the conventions of the ILO and the United Nations as well as national law, child labor is strictly prohibited. The minimum age for employing shall not be below the age of completion of compulsory education under no circumstances below the minimum age of 15 years (or 14 years if so, stated in national law in accordance with ILO Convention 138).

REMUNERATION

Remuneration for the work performed during regular working hours should at least achieve the statutory or industry-standard minimum wage level. In addition, overtime should be remunerated at a statutory or industry supplementary rate. It is recommended to target a level of remuneration that at least covers the living costs. All social benefits should be paid according to local law. Any kind of wage deductions as disciplinary actions do not correspond to our ethical requirements. Furthermore, we encourage every business partner to notify their workers in advance and in an understandable way about the paid remuneration and benefits.

NO FORCED LABOUR

All employees should perform their work of their own free will. Any form of slavery or forced labor, bonded labor or prison labor is strictly prohibited. Employees must not be restricted in their freedom of movement.

ENVIRONMENTAL PROTECTION

All business partners are required to comply with the applicable environmental protection laws. Furthermore, the implementation of appropriate measures to prevent, avoid and mitigate negative environmental impacts that may arise from processing steps is expected. Companies should ensure that they collect the necessary key figures and data on (their own) environmental protection standards and performance.

HEALTH AND SAFETY

The workplace and the performance of the work must not harm the health and safety of the workers. A safe and clean working atmosphere should be provided. Occupational health and safe working conditions should be practiced taking preventive measures against incidents and injuries occurring during work or as a result of the use of work equipment. All safety measures and prevention practices should be made available to employees. According to trainings should be provided on demand. The same applies to all other sites where staff members are employed.

TRUSTFUL BUSINESS RELATIONSHIP

Any kind of corruption, blackmailing, bribery, and fraudulent misrepresentation with regard to the origin of the purchased raw materials will not be tolerated. This also applies to any kind of money laundering, either directly or indirectly.

We expect a fair business environment and expect the same from our partners. This implies compliance with all antitrust and competition laws. In addition, our business partners are required to take appropriate precautions to prevent relationships, activities, or transactions where private interests or relationships have influenced or may influence a business decision.

Our business partners are required to pay all duties, fees, royalties, and taxes imposed in connection with trade, export, and mineral extraction to the relevant government authorities. We also require our business partners to comply with data protection and information security laws.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

All workers should have the right to establish or join workers' organizations, including trade unions.

In the event of legal restrictions on freedom of association or the right to collective bargaining, workers should be allowed to form organizations representing their interests and to engage in direct communication with the employer. In addition, an alternative option to freedom of association and collective bargaining should be provided.

NO SUPPORT TO NON-STATE ARMED GROUPS

International laws to prevent direct and indirect support to non-state armed groups and political or private security forces must be followed.

WORKING CONDITIONS

All employees should be treated with dignity and respect. Any form of corporal punishment, psychological, sexual, or verbal harassment and abuse, and any form of mistreatment are prohibited. Disciplinary actions should be taken in accordance with local law and international human rights standards. We also urge that disciplinary action not be imposed on employees who allege violations related to this Code or local law.

All employees should be provided with an official document of their employment, such as an employment contract. This should include all terms and conditions of employment, including wages and benefits, payment period, leave entitlement and period of notice.

NO EXCESSIVE OVERTIME

Working hours should be in accordance with the local law. In any case, regular working hours should not exceed 48 hours per week. Overtime should not exceed 12 hours per week and should be on a voluntary basis. We also expect overtime to be remunerated as such. After every period of six working days, at least one day off should be granted to all employees.

NO DISCRIMINATION AND ABUSE

Our business partners are required to treat their employees equally. All forms of discrimination based on gender, religion, age, race, social origin, caste, nationality, ethical or national background, trade union membership, disability, sexual or political orientation or other personal characteristics will not be tolerated.

In case of queries or information about violations of this code, please feel free to contact us through the contact details mentioned above.