Code of Conduct
for suppliers and subcontractors
HEINZ-GLAS Group

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1 Introduction

The HEINZ-GLAS Group (HEINZ-GLAS GmbH Co. KGaA and all affiliated companies) is committed to responsible corporate governance in accordance with its corporate values and mission statement. The Code of Conduct sets out binding guidelines for daily business practice for all persons within the HEINZ-GLAS Group, based on ecological, economic, social and ethical principles.
The Code is based on international standards and legal requirements, such as human rights, children's rights, ILO labor standards and the United Nations Global Compact. Specific guidelines for HEINZ-GLAS subsidiaries outside Germany allow the Code to be adapted to local social and legal characteristics.

2 Area of application

The Code of Conduct applies worldwide to all suppliers and subcontractors of the HEINZ-GLAS Group, in particular with locations in Germany, the Czech Republic, Poland, Peru, France, Italy, Brazil, Spain, the United Kingdom, the United States of America and China.

3 Principles and values (requirements) of the Code of Conduct

3.1 Social responsibility

3.1.1 Discrimination

Discrimination, sexual harassment or personal attacks are not tolerated. Equal treatment is a firm principle, regardless of ethnic or social origin, skin color, gender, religion, nationality, sexual orientation, age, disability, health status, pregnancy or political views. The personal dignity, privacy and personal rights of each individual are respected.

3.1.2 Child labor

Child labor is not used at any point. It is prohibited to employ a child under the age at which compulsory schooling ends according to the law of the place of employment, whereby the age of employment may not be less than 15 years. This does not apply if the applicable law of the place of employment deviates from this in accordance with No. 138 of the International Labor Organization on the minimum age for admission to employment. Employees under the age of 18 may not perform hazardous work and are excluded from night work. The prohibition of the worst forms of child labor in accordance with Convention No. 182 of the International Labor Organization must be observed.

3.1.3 Forced labor and human trafficking

Any form of forced labor, slavery, servitude or similar practices is strictly prohibited. Work must be voluntary, without threat of punishment, and employees must be able to terminate employment at any time. Unacceptable treatment in the workplace, including economic or sexual exploitation and humiliation, is prohibited.

3.1.4 Working hours and remuneration

Working time regulations, overtime, remuneration, vacation entitlement or fringe benefits are at least defined by law or beyond as a benefit for the employee. Compensation for full-time employees must cover basic needs; illegal wage deductions are prohibited. Overtime must be voluntary and limited in accordance with the applicable law of the place of employment.

3.1.5 Health protection and occupational safety

The occupational health and safety regulations applicable at the respective place of employment are complied with in order to avoid accidents and health hazards and to ensure a safe working environment. Employees receive regular training on occupational health and safety issues in order to minimize health risks.

3.1.6 Employee representation and freedom of association

The right to form trade unions, join trade unions and bargain collectively is recognized without restriction. Where this is restricted by local laws, alternative options for independent employee associations are made possible. Discrimination on the basis of trade union activities is prohibited. Employee representatives enjoy protection against discrimination and have access to the necessary workplaces for their tasks.

3.2 Ecological responsibility

3.2.1 Compliance with environmental standards | -agreements

It must be ensured that there is no risk of violations of prohibitions, including the ban on mercury and mercury-containing products and the proper treatment of mercury waste in accordance with the Minamata Convention. Furthermore, violations of the Stockholm Convention on Persistent Organic Pollutants, violations of the Basel Convention banning the export of hazardous waste and violations of the ban on the environmentally unsound handling, collection, storage and disposal of waste in accordance with the provisions of the POPs Convention must be avoided. Compliance with climate-

related obligations to achieve the 1.5 degree target and climate neutrality is a top priority in accordance with the agreements of the World Climate Conference.

3.2.2 Dealing with natural resources

Legal environmental protection standards are complied with at all operating sites.
In addition, we aim to implement management systems such as environmental management in accordance with 14001 and energy management in accordance with 50001. The responsible use of natural resources is ensured through monitoring and targeted processes to reduce or avoid resource consumption and waste generation.

3.2.3 Preserving the natural basis of life

Harmful changes to the soil, water and air pollution, noise emissions and excessive water consumption must be avoided if they are detrimental to human health, significantly impair natural resources for food production or impede or destroy access to clean drinking water or sanitary facilities.

3.2.4 Dealing with conflict materials

Processes must be established in accordance with the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Conflict Minerals such as tin, tungsten, tantalum and gold, as well as other commodities such as cobalt. Smelting and refining operations without adequate, audited due diligence processes must be avoided.

3.2.5 Waste and recycling

Production waste is optimally reused or passed on to recycling programs. Other waste is separated, recycled or reused in order to continuously increase recycling rates. In addition, the amount of waste is systematically reduced and environmentally harmful materials are disposed of responsibly.

3.2.6 Air emissions

General emissions from operating processes (air and noise emissions) are monitored regularly and measures to reduce them are implemented where necessary. This also applies to greenhouse gas and VOC emissions. Targeted measures and transition plans are defined accordingly.

3.2.7 Certifications and ratings

Certifications and assessments by accredited and independent organisations serve to ensure constant control and transparency within the framework of globally valid standards. That is why we pay particular attention to appropriate verification and certifications when selecting our suppliers and subcontractors.

3.3 Economic responsibility

3.3.1 Fair dealings with business partners

Fair dealings are maintained with all business partners and third parties and respectful cooperation is encouraged.

3.3.2 Competition and antitrust law

Anti-competitive agreements, such as price fixing or the manipulation of offers between competitors, are not permitted.

3.3.3 Corruption and conflicts of interest

Corruption, bribery, extortion and embezzlement are strictly prohibited. Employees may neither offer, promise, grant or approve benefits nor accept or demand such benefits from others. Gifts to civil servants or other public officials are prohibited. Contracts are awarded solely on the basis of performance and objective criteria, without taking personal interests into account.

3.3.4 Intellectual property

The intellectual property rights of others, including confidentiality, must be respected and complied with. Technology and know-how must be transferred in such a way that intellectual property rights and customer information are protected.

3.3.5 Data protection and confidentiality

3.3.5.1 Data protection and defense against external threats

Data protection rules and information security laws are strictly adhered to in order to prevent the misuse of confidential data. Data is only used within the authorized framework.

3.3.5.2 Confidentiality

All business and operational information obtained in the course of cooperation with the HEINZ-GLAS Group that is not lawfully accessible to the public is subject to confidentiality (confidentiality obligation). They may not be disclosed to unauthorized third parties, even after termination of the business relationship. Any individual agreements on confidentiality that go beyond this provision shall remain unaffected by this.

4 Whistleblower system

The HEINZ-GLAS Group's whistleblower system can be used to anonymously report grievances, in particular violations of applicable law, human rights and environmental violations as well as violations of internal guidelines and processes.

Whistleblower system:
https://heinz-glas.reporting-channel.com

5 Implementation of the principles, values and regulations

Recognizing risks in supply chains and acting appropriately is crucial. Suspected cases of potential or actual violations of the Code of Conduct within the business unit or the supply chain must be reported immediately to the HEINZ-GLAS Group in writing.

The Supplier | Subcontractor is obliged to pass on the information received from the HEINZ-GLAS Group on the complaints procedure to its employees in an appropriate manner. The complaints procedure must be accessible to employees while maintaining the confidentiality of their identity and offer effective protection against discrimination.

The HEINZ-GLAS Group verifies compliance with the principles, values and regulations listed in this document by means of supplier self-assessments and risk-based audits at the production sites. Such audits can be carried out annually or as required after appropriate advance notice, if necessary by commissioned third parties.

The HEINZ-GLAS Group supports the supplier | subcontractor in implementing the principles, values and regulations. The type and scope of support are at the sole discretion of the HEINZ-GLAS Group.

The HEINZ-GLAS Group shall provide written notification of any violations identified and set a reasonable deadline for correction. If a quick solution is not possible, the supplier | subcontractor must report this immediately and develop a concept. In the event of persistent violations, the HEINZ-GLAS Group reserves the right to terminate the business relationship. A statutory right to extraordinary termination and the right to compensation remain unaffected.

Carletta Heinz

Carletta Heinz
Owner & CEO

Frank Martin

Frank Martin
CFO

Declaration of the supplier | Subcontractor

"By signing the HEINZ-GLAS Group Code of Conduct, we confirm that we will act responsibly and take into account the principles of the Code within the framework of our own guidelines and codes. We will address the principles of the Code in an appropriate manner within our organisation and with our suppliers and subcontractors, and take measures in line with applicable law and our internal processes to support these principles, values and regulations."

Ort, Datum	Supplier | Subcontractor	Signature