**Code of Conduct and Policy on Sustainable Action in the Areas of Environment, Energy, Quality and People**

**C + P ESTABLISHMENT Division**

The C + P Code of Conduct is based on internationally recognized standards for sustainable economic activity. These include the United Nations Global Compact, the conventions of the International Labor Organization (ILO), the UN conventions on the rights of children, the UN Declaration of Human Rights and the SA8000 social standard.

Within the framework of the company's internal risk management and by signing this Code of Conduct, the C + P management commits itself as well as all C + P employees at all company levels of the C + P division ESTABLISHMENT (hereinafter referred to as "C + P") to the general principles of action and conduct outlined below in order to ensure compliance in all activities.

A consistent application across all companies of the C + P ESTABLISHMENT division is guaranteed by the cross-company assigned responsibility and guideline competence of the managing director of C + P GmbH & Co. KG (intermediate holding C + P ESTABLISHMENT division) and the division managers of the functional areas employed in this company. At the time of formulation of the C + P Code of Conduct and Policy, business processes are fully covered with the following functional areas: Development, Purchasing, Production, Logistics, Sales and Marketing, Data Processing and Organization, Human Resources, Finance and Accounting.

The specifications listed below thus serve as a guideline for all employees and must be observed throughout.

**1. adherence to laws (compliance):**

All applicable laws and regulations and all other relevant legal provisions of the respective applicable legal systems at national and international level must be complied with.

**2. prohibition of discrimination:**

Any discrimination in hiring, compensation, access to training, promotion, termination of employment or retirement based on gender, age, religion, race, caste, birth, social background, disability, ethnic or national origin, nationality, membership in employee organizations including unions, political membership or views, sexual orientation, family responsibilities, marital status or any other condition is prohibited.

**3. prohibition of forced and compulsory labor and disciplinary measures:**

Any form of forced labor is prohibited. This expressly includes prison labor. The company must treat its employees with dignity and respect at all times and protect them from psychological or physical coercion of any kind. No regulation may restrict an employee's personal freedom of movement. Employees shall be free to leave the Company upon reasonable notice in accordance with applicable law. Employees may not be required by the employer to deposit money or identification papers.

**4. freedom of association and the right to collective bargaining:**

All employees have the right to form, join and organize unions of their choice and to bargain collectively with the company on their behalf to the extent permitted by national laws. In the event that national standards restrict these rights, we permit the free and independent association of employees for the purpose of bargaining.

**5. prohibition of child labor:**

Child labor is prohibited in accordance with ILO and United Nations conventions. The minimum age for admission to employment is 15 years and may not be less than the age at which compulsory schooling ends. Young workers must be given special protection. All working time regulations for the protection of juvenile workers must be observed. In addition, under no circumstances may juvenile workers work more than eight hours a day or on a night shift.

**6. labor wages:**

All employees must be paid a fair wage. The wage paid should be at least sufficient to cover the basic needs of employees at full employment. Legally applicable minimum wages are observed.

**7. working hours:**

The maximum permissible weekly working hours apply in accordance with national legislation.

**8. health and safety at work:**

Alongside customers and suppliers, employees are our most important partners, actively shaping our work processes and products with the understanding that internally they act simultaneously as customers and suppliers. Direct involvement of employees in projects and in CIP circles enables us to harness the knowledge and personal skills of each individual for continuous improvement in sustainability, quality, environmental compatibility and energy-related performance.

C + P assumes responsibility for a safe and healthy working environment. Suitable preventive measures must be taken against potential accidents or damage to health, e.g. by setting up an occupational safety management system. The same minimum requirements apply to employee accommodations. Regulations and procedures must be clearly defined and complied with at all times. All employees are to be regularly informed and trained with regard to the measures. The training measures shall be documented.

**9. environmental protection and energy management:**

We are committed to the careful and sustainable use of resources - energy, fuel, materials, packaging materials and people - and to preventing environmental pollution, protecting biodiversity and ecosystems, health protection, occupational safety and increasing energy efficiency in the development of our products as well as in the planning and implementation of all operational processes. This commitment is the framework for setting our energy and environmental targets.

Compliance with all applicable internal and external regulations by all employees in their area of work is a minimum requirement. In addition, we make every reasonable effort to comply with internationally recognized standards on environmental protection as well. Our goal is to minimize environmental emissions and the consumption of natural resources, as well as to improve overall energy efficiency.

All employees and suppliers and service providers commissioned by us at our sites or at our customers' sites must ensure that they work in an energy-efficient manner and avoid unnecessary energy consumption. The principle of energy efficiency applies to the entire company premises and the associated properties as well as to all construction and assembly sites that are set up on behalf of C + P.
Design-related activities to improve energy efficiency and procurement of energy-efficient products and services are expressly supported*.*

**10. fight against corruption:**

All forms of corruption or bribery are prohibited. We do not tolerate them in any form and have established appropriate systems to combat them. The guidelines of Transparency International and the OECD serve as guidelines for action. Due to flat hierarchies, the Executive Board, which is controlled by a Supervisory Board composed of persons from outside the company, generally has detailed knowledge of significant individual contracts and their backgrounds. As a result, corruption and antitrust risks are generally minimized. In addition, the application of the four-eyes principle and, in some cases, the six-eyes principle, prevents improper actions at all levels.

 **11. conduct in the business environment:**

We behave fairly in competition and observe the applicable antitrust laws. The legal obligations for money laundering prevention are complied with.

**12. special employment relationships:**

Circumvention of the provisions of this Code of Conduct or of applicable law through the use of temporary employment, pretextual training programs, subcontracting, homeworking or the like shall not be undertaken.

**13. grievance mechanisms:**

C + P establishes a procedure in its production facilities that allows employees to complain anonymously. No reprisals will be taken against employees who report violations of legal requirements or the contents of this Code of Conduct. Employees may not be prevented from making such notifications.

**14. quality:**

For C+P, quality is the value of the performance characteristics of our products and all accompanying services from the product idea to installation at the customer's site. The performance characteristics are specified by our customers and form the framework for our quality targets.

**15. shared responsibility and commitment in the supply chain**

By communicating this policy to our business partners and asking them to commit to it, we work to ensure that the implementation of this Code of Conduct and policy is also enforced in our supply chain. We regularly monitor compliance. The result is recorded in the annual supplier evaluation and is a criterion in the ordering process*.*

**16. integrated management system:**

C + P has internal guidelines and systems to implement the requirements from this Code of Conduct and Policy. We have certified an environmental management system according to DIN EN ISO 14001 ff, an energy management system according to DIN EN ISO 50001 ff and a quality management system according to DIN EN ISO 9001 ff.

With this policy and the Code of Conduct, C+P is committed to meeting the requirements of the above standards within the scope of application*.*

C+P is committed to communicating the policy and code to all employees, customers, suppliers and contractors and documenting this accordingly.

With our Integrated Management System, we ensure that necessary information is available at all times, that deviations between requirements and work results are identified, explained, and remedied, and that risks and opportunities are identified and managed.

This system allows us to constantly review the effectiveness and continuously improve the ability to ensure customer satisfaction, sustainability, energy efficiency and thus the continuity of the company today and in the future.

This Code of Conduct and policy, as well as the derived objectives, are understood by our companies, both by the management and by each employee as a commitment and declaration of intent. The management with the leadership team ensures that the policy and objectives are implemented in an exemplary manner for all employees, communicated and exemplified to all and that the necessary resources are provided to achieve strategic and operational energy, environmental, quality and sustainability goals*.*

Breidenbach, 14.11.2022

**C + P GmbH & Co KG**

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Tomas Kirschenfauth

Chairman of the Management Board

**References**

**United Nations Global Compact**

http://www.unglobalcompact.org/

Protect human rights, no discrimination, abolition of child and forced labor, use of environmentally friendly technologies and against any kind of corruption.

**Transparency International**

http://www.transparency.de/

Integrity, accountability, transparency and participation of civil society. Against corruption, as the abuse of entrusted power for private benefit or advantage.

**OECD**

http://www.oecd.org/

For the economic and social well-being of the people. Criminal law measures against bribery of foreign officials (including members of parliament).

**International Labor Organization (ILO**)

https://www.ilo.org/global/lang--en/index.htm
Decent working conditions for all women and men, no child labor, improving social protection and strengthening dialogue on labor-related issues.

# DIN ISO 45001

**DIN EN ISO 9001**

**DIN EN ISO 14001**

**DIN EN ISO 50001**