



#### **Definition**

A Code of Conduct (CoC) is a collection of legal and voluntary guidelines and regulations that a company imposes on itself. The rules set out in a CoC serve as a guideline for suppliers and their employees. It allows for the furtherance of desirable behavior while, at the same time, it helps to identify and avoid undesirable actions.



# 1. Purpose and scope

The Stettler sustainability strategy determines our actions. It not only guides our company, but also sets out what we expect from our suppliers. Stettler acts according to a corporate vision which in turn is reflected in our Code of Conduct. Our Code of Conduct sets out in concrete terms our global requirements and guides our actions. It incorporates national as well as international rules and laws as well as the values and social conventions according to which we want to act and be treated by others. The Code of Conduct sets out the conditions that enable a successful long-term cooperation with Stettler. In order to maximize the impact of our sustainability strategy, we expect our suppliers to select their own suppliers and sub-suppliers in accordance with same or, at the very least, comparable criteria.

# 1.1 Compliance with laws and social standards

Compliance with laws and regulations at local, national and international level is a matter of course for Stettler and its suppliers. This also applies to indirect legal obligations. Insofar as Stettler's suppliers are dependent on Stettler to comply with legal obligations which directly affect only the respective supplier, Stettler will cooperate insofar as this is possible and reasonable. Stettler and its suppliers shall cooperate with supervisory bodies and other government agencies in order to enable them to carry out their public duties. Projects requiring approval of a government agency or regulatory body will not be carried out before the necessary approval has been granted. We shall always and immediately investigate violations of applicable law if circumstances give rise to concerns that such violations have taken place and we shall take the necessary steps if suspicion is confirmed.

In the social context, we require compliance with the core labour standards of the International Labour Organisation (ILO) [1].

Furthermore, we explicitly ask our suppliers to follow the principles of the Global Compact [2].

We do not tolerate any form of corruption or bribery.

- [1] http://www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/lang-de/index.htm
- [2] https://www.unglobalcompact.org/languages/german/die\_zehn\_prinzipien.html



#### 1.2 Dealing openly with criticism and conflicts

Communication is the most effective means of dealing with and resolving disagreements. Stettler encourages its members of staff, its suppliers and its customers to raise concerns of any kind early on. All parties involved are required to diligently address and appropriately resolve the issues raised.

#### 2. People

Stettler places great importance on the satisfaction of the people who deal with the company or come into contact with its products.

Our suppliers undertake to comply with the following agreements and to monitor them regularly in addition to any applicable legal requirement and internationally recognized standards such as the ILO core labour standard and the principles of the Global Compact.

# 2.1 Human rights and labour standards

Stettler requires that employees, suppliers and other business partners are treated with fairness, respect and dignity. With regard to this, compliance with the ILO core labour standards is a basic prerequisite. In addition, appropriate measures must be taken to prevent the violation of human rights and labour standards.

#### 2.2 Forced and child labour

Employment of minors who are still of school age in the respective country is strictly prohibited. According to the ILO, children under the age of 15 must not be employed. Stettler rejects any use of forced or compulsory labour as well as any form of human trafficking.

# 2.3 Humane treatment and discrimination

It must be ensured that inhumane working conditions, discrimination and harassment are excluded. Employees shall not be discriminated against or disadvantaged on the basis of race, national origin, colour, religion, gender, sexual orientation or any other grounds.

#### 2.4 Health and Safety

In order to provide a minimum standard of protection for workers, we expect all workplaces to meet the health and safety standards as set out in the National Occupational Health and Safety Act.



# 2.5 Wages and working hours

Working hours shall not exceed the limit on working hours as prescribed by applicable national labour laws. Furthermore, the supplier will comply with any applicable statutory rules on minimum wage and shall undertake to pay its employees at least a wage equivalent to the local salary that is commonly paid for comparable work.

#### 2.6 Data protection and privacy

Everyone has a right to privacy. Furthermore, every person has the right to determine the whereabouts of his or her data. Stettler respects the privacy of every person and guarantees the best possible data protection. Stettler expects the same from its suppliers. When collecting, storing, processing, transmitting and forwarding personal data, the Supplier shall comply with the applicable laws on data protection and information security and the official regulations.

#### 3.Environment

Our suppliers have the responsibility to further reduce the consumption of resources as well as the emission of substances that are harmful to the environment, and to avoid environmental pollution as much as possible. The compliance with applicable environmental laws and regulations is complemented by predefined environmental targets and a promise to continuously improve environmental management. In principle, we expect our suppliers to put in place internationally compatible environmental management systems such as ISO 14001. In addition, we welcome the use of an international energy management system such as ISO 50001.

#### 3.1 Consumption of resources

Our suppliers have a duty to use natural resources responsibly and to contribute to the mindful consumption of energy, water and fuels.

#### 3.2 Emissions

Legal limits on emissions must be complied with and necessary countermeasures must be taken in the event of a violation.

Upon Stettler's request, the supplier has to provide information about his CO2 footprint (Scope 1 - 3). Only CO2 footprints are accepted that are in accordance with applicable norms and international standards (e.g. GHG Protocol).



#### 3.3 Hazardous substances

We require our suppliers to handle hazardous materials in a professional manner to protect their employees and the environment.

# 3.4 Waste prevention and recyclable products

Our suppliers have a duty to avoid waste as much as possible and, whenever possible, to avoid creating waste altogether rather than recycling it. Where possible, new products should be designed to be recyclable.

Unauthorised disposal of waste is not acceptable and violates Stettler's standards.

# 3.5 Refraining from the use of environmentally harmful raw materials

The use of raw materials and manufacturing processes that are harmful to the environment is to be avoided as far as possible.

#### 4. Economy

In order to ensure the success of our products as well as our business relations in the future, our suppliers commit to continuously improve the quality of their products, work and processes. Management systems, such as ISO 9001, are an important part of this. Stettler also expects its suppliers to continuously develop their management systems.

#### **4.1 Corruption**

Our suppliers make their decisions exclusively on the basis of objective and professional criteria and, in particular, do not allow themselves to be influenced by personal relationships, personal interests or those of third parties.

# 4.2 Gifts and invitations

Our suppliers do not directly or indirectly offer or make available to employees of Stettler inappropriate benefits in the form of gifts, hospitality or invitations for the purpose of dishonestly influencing Stettler employees. Stettler employees will always politely refuse such gratuities and refrain from extending such gratuities to others.

Our suppliers shall in particular ensure that their employees, subcontractors, consultants, agents and representatives also comply with these requirements.



#### 4.3 Services and products

With regard to the planning, development and implementation of products and services, a balance should be struck between economic, social and ecological requirements. Confidential handling of company documents from business dealings and careful handling of Stettler's operating resources must be observed. Any attempt at misuse, destruction or manipulation, as well as the loss of information and the equipment provided must be avoided.

The integrity of products must be such that the product does not pose a danger to the health and safety of persons who comply with safety instructions. In this respect, with regard to the entire life cycle of a product, current scientific knowledge as well as technical standards are to be observed when placing a product on the market.

#### 4.4 Evaluation of suppliers

Stettler assesses the performance of its suppliers. In doing so, we pay particular attention to the quality as well as the logistical, technical, sustainable and economic performance of the supplier.

# 5. Joint Action and practical Dealings

As a matter of principle, we work together with environmentally and socially responsible suppliers who do not behave in a way that violates competition and anti-trust laws. Any such violations will have a bearing on the business relationship between Stettler and the supplier as appropriate measures will be taken by Stettler. In line with our legal obligations, we require suppliers to combat money laundering and the financing of terrorism. We expect our suppliers to sign the Stettler CoC. If a general Code of Conduct that is widely used in the industry has already been signed, we will check whether it meets our own standards. We require our suppliers to promote compliance with the CoC and to pass on the CoC in the supply chain.

# 5.1 Reporting of violations and annual status check

Our suppliers undertake to actively report violations (e.g. corruption, child labour) of the Code of Conduct for Suppliers, to explain the cause of the violation and to present a prevention strategy that will allow for the avoidance of violations in the future. In addition, they must participate in an annual survey on the current implementation of the Code of Conduct for Suppliers. The information will be collected via an online questionnaire.

# **Code of Conduct for Suppliers**

#### **5.2 Possible consequences**

In case of serious violations (e.g. corruption, child labour) and repeated violations of the Code of Conduct for Suppliers, which have taken place in spite of a warning issued by Stettler to the supplier, the supplier should expect that the business relationship will be terminated. In order to prevent this, Stettler is willing to engage in a dialogue with any supplier who demonstrates that he is willing to adhere to the Code of Conduct for Suppliers and remedy any violations.

One of Stettler's goals is to work with others to improve working conditions of employees and to reduce environmental impact.

The management