

Policy Statement

1. Introduction

Brasseler GmbH & Co KG and its affiliated companies are committed to compliance with all relevant laws and regulations, respect for human rights and ecologically and socially responsible corporate governance. We observe the principles of social, ecological and ethical behavior, which are an integral part of our corporate culture. We are constantly striving to improve our business activities as well as our products and services in a sustainable manner. As an international company, we are aware of our responsibility for human rights and environmental protection. Respect for human rights and our commitment to environmental and social responsibility encompass not only our own business operations, but also our supply chain.

The provisions of this Code of Conduct are based on national laws and regulations as well as international regulations and conventions, including, but not limited to

Universal Declaration of Human Rights of the United Nations (UN)

United Nations Guiding Principles on Business and Human Rights (UNGPR)

Conventions and recommendations of the International Labor Organization (ILO) on labor and social standards

Principles of the United Nations Global Compact (UNGC)

UN Convention on the Rights of the Child

UN Convention on the Elimination of All Forms of Discrimination against Women

Guidelines of the Organization for Economic Cooperation and Development (OECD) for multinational enterprises and

Forced Labor Priority Principles of the Consumer Goods Forum (CGF)

UN Women's Empowerment Principles International Covenant on Civil and Political Rights of December 19, 1966

International Covenant of December 19, 1966, on Economic, Social and Cultural Rights

Minamata Convention on Mercury of October 10, 2013 (Minamata Convention)

Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989 (Basel Convention)

2. Commitment of the company management

The company management undertakes to comply with human rights and environmental due diligence obligations in its own area of responsibility and to monitor compliance. In addition, business partners are also required to comply with these obligations and are monitored accordingly. To fulfill these purposes, we use risk management methods that are integrated into business processes. In order to take account of the importance of human rights and environmental duties, a person has been appointed at management level who is responsible for these issues. Starting from there, the topic is brought to all areas of the company in order to create a shared awareness of compliance with human rights and environmental due diligence obligations. Our due diligence processes are subject to regular review and continuous improvement and development.

3. Implementation of human rights and environmental due diligence obligations in the company's own business area

Brasseler GmbH & Co KG and its affiliated companies offer a working environment characterized by openness, fairness and diversity. This is ensured by the following measures, among others:

- Appropriate remuneration
- Compliance with regulations on working hours
- Guarantee of freedom of association, e.g. participation in the works council
- Compliance with health and safety regulations
- Prohibition of child labor
- Prohibition of discrimination
- Prohibition of forced labor
- and many more.

We endeavor to protect and preserve natural resources by using energy sparingly and responsibly and by taking measures to protect the environment. We comply with the applicable environmental laws and other environmental protection regulations.

4. Supply chain

In order to comply with due diligence obligations, we carry out a risk analysis of our direct suppliers. As part of the risk analysis, we assess both the abstract risks according to country of origin and industry sector and the specific risks that can be obtained from public sources regarding the respective supplier.

The most important raw materials we acquire are stainless steels and tungsten carbide products. We purchase these raw materials predominantly from suppliers in the EU, where equivalent standards for compliance with human rights and environmental due diligence obligations apply and where there is a functioning administrative and judicial system within which any violations can be quickly detected and remedied.

We occasionally procure medical products (merchandise) and raw materials from Asian sources, primarily from South Korea. There is a particular focus on these suppliers as a result of the risk analysis carried out.

Compliance with our Code of Conduct has been integrated into the process of approving new suppliers and monitoring existing ones.

Compliance with human rights and environmental due diligence obligations is part of the contracts with our suppliers. Suppliers have the option of accepting the essence of our Code of Conduct or the parties mutually acknowledge their respective Codes of Conduct, provided that these are essentially equivalent.

Compliance with the due diligence obligations is monitored on a risk basis using various tools. Violations are punished according to a graduated system of sanctions. Measures can include the development and implementation of a plan to end or minimize violations, cooperation with other companies at industry level to define uniform standards or a temporary suspension of a business relationship. Ultimately, we reserve the right to terminate a business relationship if there are serious violations of human rights or environmental due diligence obligations that cannot be remedied despite the remedial measures taken.

5. Communication

Our Code of Conduct is posted transparently on the intranet for all employees; business partners receive the Code of Conduct or a reference to its location on the Internet when they enter into a contractual relationship with us. The Code of Conduct is therefore also available on the Internet. As part of the risk-based approach, employees and business partners can be offered training on the Code of Conduct.

6. Complaints procedure

We offer our employees and business partners the opportunity to report violations of the obligations arising from our Code of Conduct and other human rights and environmental obligations through an anonymous reporting system. Any reports can be submitted via the e-mail address: esg.brasseler@brandi.net. These are then processed according to a predefined procedure.

7. Continuous improvement

Our due diligence processes are subject to regular review and continuous improvement and development.

8. Documentation and reporting

The measures in accordance with this declaration of principles are documented, and reporting on human rights and environmental risks and measures is carried out in accordance with legal requirements.

Company Management