



**Code of Conduct**

# I. Preamble



## Dear Colleagues,

NEUMO is aware of its responsibility towards future generations. Many years ago, NEUMO committed to maintaining a trustworthy and transparent relationship within the workforce and with all our customers and suppliers.

As the parent company of the NEUMO Ehrenberg Group, we offer a wide range of applications from a single source. We stand for **innovation, quality, respectful interaction, and sustainable actions.**

This Code of Conduct brings together binding fundamental rules and principles of **human rights, fair working conditions, sustainability and anti-corruption.** Strict adherence to these is a fundamental principle of good corporate governance for me as the CEO of NEUMO. It provides good guidance for board and management members, executives, and all employees of NEUMO.

We comply with applicable legal regulations and other requirements and commit ourselves with this Code of Conduct to the legal standards and norms such as the **OECD Guidelines, the UN Guiding Principles on Business and Human Rights** and the 10 Principles of the **UN Global Compact.**

The Code of Conduct sets out our own standards and describes how we want to interact with each other. Equally, it is a global promise for responsible action towards all our partners, the public, and the environment.

Let's take the road ahead together!

Yours,  
Wolf Ehrenberg

## II. Scope

NEUMO is committed to complying with the standards set out in this Code of Conduct. This Code of Conduct and compliance with these standards also apply to all business partners of NEUMO and is a prerequisite for our business relationships. This applies to all business partners who have a direct business relationship with NEUMO.

Furthermore, NEUMO expects its business partners to align their entire value chain and further areas of action with these standards and requirements to ensure responsible actions and innovative cooperation throughout the entire supply chain.

strategic

partnership



### III. Compliance with Applicable Regulations

NEUMO complies with all applicable national and international laws and regulations. This applies equally to our business partners. In all cases, the regulations with the strictest requirements shall take precedence.



# IV. Respect for Human Rights



## 1. Prohibition of Child Labor



- Compliance with all applicable laws regarding child labor
- Minimum permissible age not below the age at which compulsory schooling ends
- In the absence of regulations for minimum age, no persons under 14 years are employed
- No employment of workers under 18 years for physically hazardous work or night shifts





## 2. Prohibition of Forced Labor

- Forced or compulsory labor is prohibited
- Work is not used as a punitive measure for discipline or punishment
- Every employee has constant control over their identification documents and official papers
- Disciplinary rules and procedures are clearly formulated in accordance with applicable law and communicated comprehensibly

## 3. Prohibition of Discrimination

- Any form of discrimination, disadvantage, harassment, bullying and defamation is strictly rejected
- Ensuring fundamental equal opportunities and equal treatment, regardless of skin color, race, nationality, ethnicity, political affiliation, social origin, disability, sexual orientation, religious beliefs, gender and age

## 4. Freedom of Assembly and Association

- Recognition of the right to form and join trade unions and participate in collective bargaining
- Respect for the independence of trade unions
- Equal treatment of union members with other employees

## 5. Regulated Working Conditions

- Compliance with applicable laws and binding industry standards regarding working hours, overtime, wages and other employer benefits
- Agreement of contractually regulated working hours with national legislation and industry standard values
- Payment appropriate, sufficient wages corresponding to national regulations or industry standards and compliance with all applicable wage and remuneration regulations
- No use of wage deductions as a disciplinary measure

## V. Health and Safety at Work

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NEUMO ensures a high level of occupational safety and expects the same from its business partners. This includes the creation and implementation of appropriate health and safety precautionary measures.

NEUMO expects from itself to comply with all applicable occupational safety regulations and to ensure a safe and health-promoting work environment, focusing on the health of employees. This includes regular reviews of workplaces, measures taken, and corresponding training. We expect our business partners to act in the same way.

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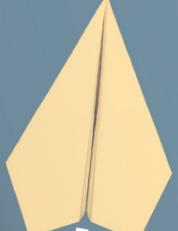
## VI. Anti-Corruption



NEUMO pursues a zero-tolerance policy regarding bribery and all other forms of corruption. Our business partners are aware of this and are prohibited from offering our employees monetary amounts of any kind, gifts, loans, discounts, or valuables that could induce employees to act against their duties. Excluded are gifts and invitations that fall within the framework of customary business hospitality, etiquette, and courtesy, and comply with our anti-corruption guidelines.

All business and advancements thereof are based solely on quality and integrity. Therefore, we expect our business partners to completely eliminate all forms and behaviors of corruption and to take appropriate measures in case of non-compliance.





## VII. Fair Competition



NEUMO promotes and recognizes a **free and unadulterated competition in the market** and aims to conduct **fair dealings with its competitors**. We expect this naturally from all market participants and therefore fundamentally reject agreements on prices and conditions as well as agreements for the purpose of market division.



## VIII. Data Protection



NEUMO takes data **protection and its legal regulation** very seriously.

We expect our business partners to handle data responsibly according to applicable legal requirements, which includes:

- Protection of personal data
- Collection of personal data only when necessary for specific and lawful purposes in accordance with data protection laws
- Transparent use of data
- Deletion of data as soon as the lawful purpose no longer exists

## IX. Sustainability and Environment

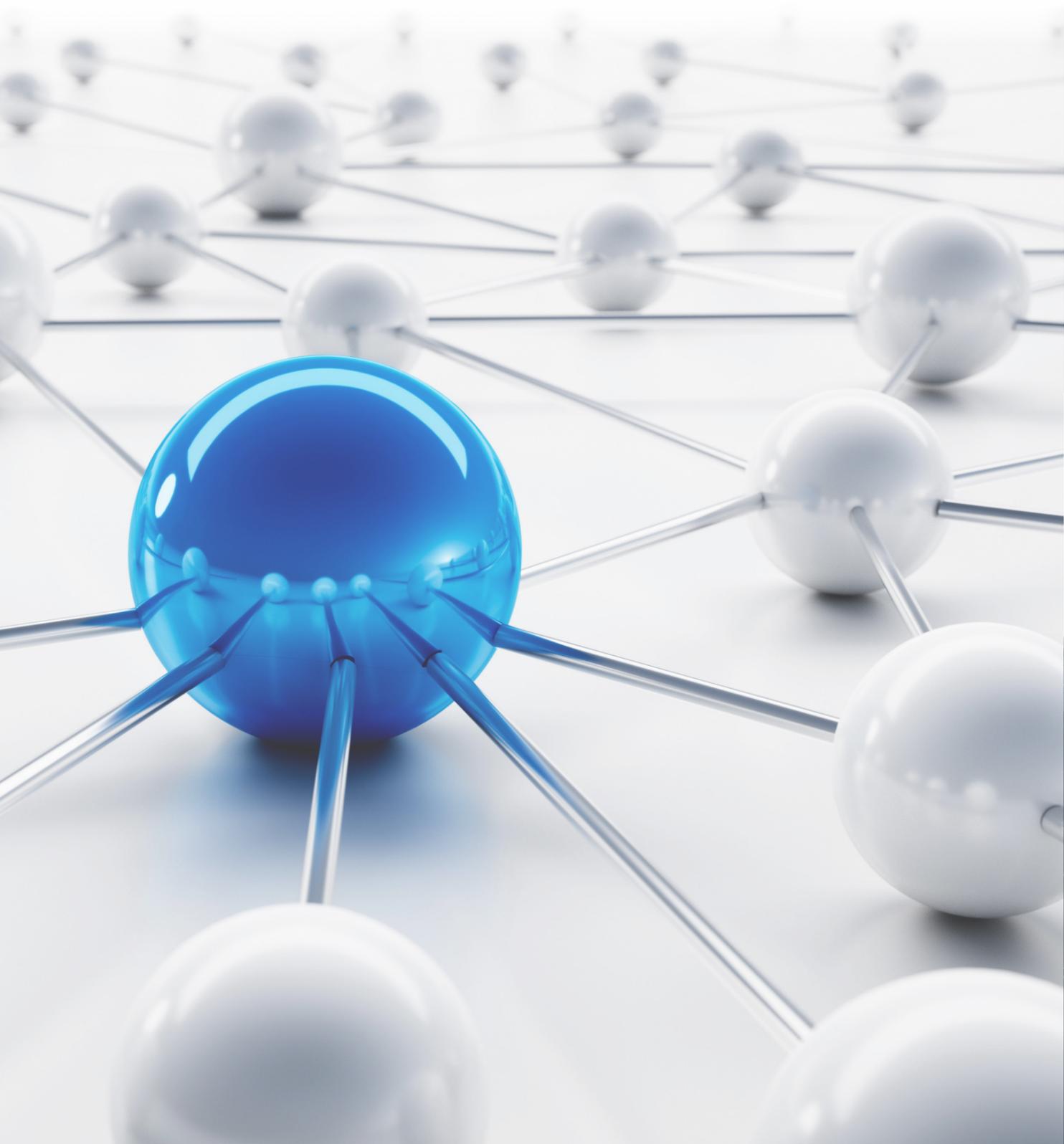


NEUMO aims to make effective contributions to **climate protection** and **resource conservation**. With our new building on the NEUMO-Ehrenberg-Campus, we are setting the first steps of our **ecological** and **sustainable actions**.

Our decisions are made with a holistic consideration of their impact on our **ecological footprint**, the environment, employees, society, and our responsibility towards future generations.

We expect our business partners to also take a holistic approach and make decisions in favor of sustainable, environmentally conscious development.

# X. Commitment and Control



## 1. Value Chain

NEUMO expects the principles anchored in this Code of Conduct also from its subcontractors and other business partners. NEUMO urges its business partners to base their actions on these same standards.





## 2. Joint Measures for Compliance with Regulations

NEUMO requires its business partners to comply with the standards outlined in this Code of Conduct and is authorized to verify compliance. Ensuring these standards is a long-term learning and development process. In case of identified risks along the value chain, our business partners commit to developing and implementing an effective concept with a corresponding schedule immediately.

We refer to the Supply Chain Due Diligence Act, which entitles us to extraordinary termination if:

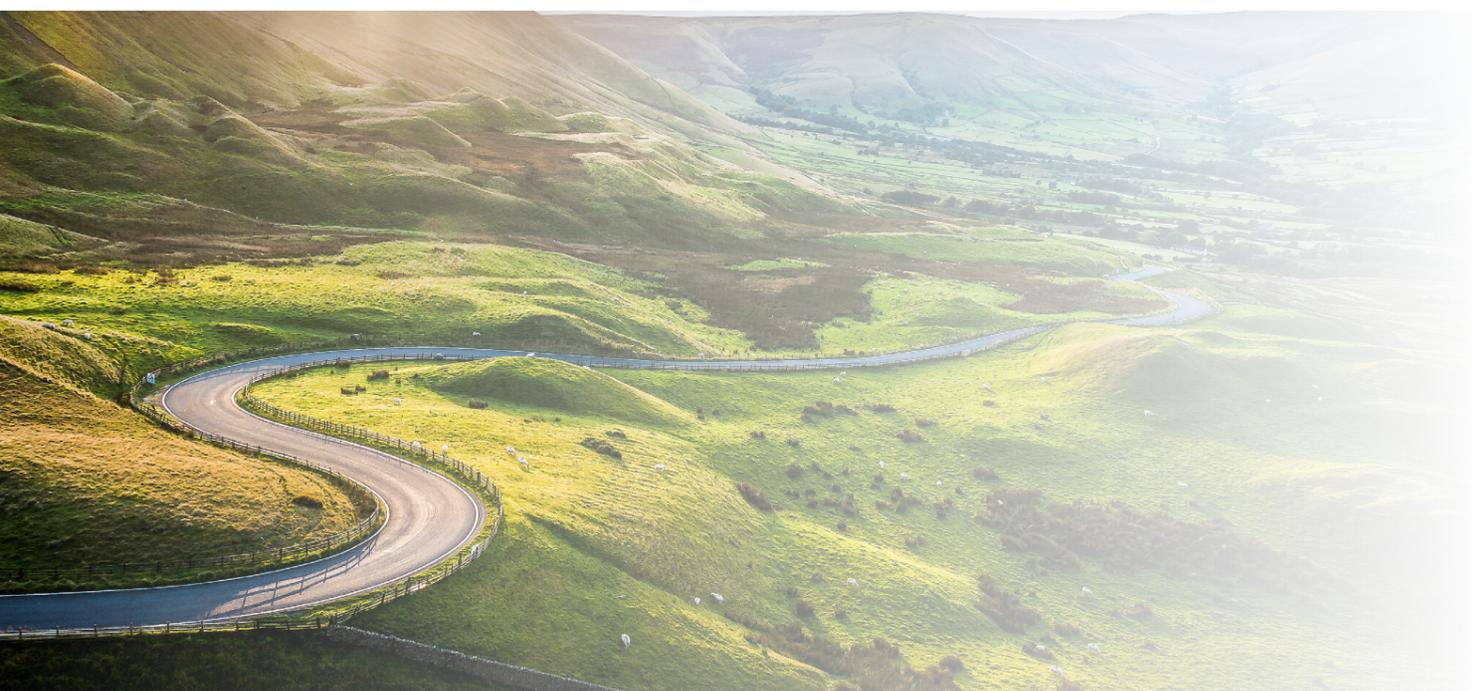
- The violation of a protected legal position or an environmental obligation is considered severe
- The implementation of the measures developed in the concept does not remedy the situation after the defined period
- NEUMO has no other milder means available and further influence opportunities have no prospect of success

## 3. Behavior in Case of Concerns

NEUMO wishes to encourage all its business partners to report violations of this Code of Conduct as well as any possible unethical or illegal behavior by NEUMO through the NEUMO reporting channel.

Please use our reporting channel through Ratisbona Compliance for this purpose.

Ratisbona Compliance Reporting Channel:



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