

## **Hans Just Group Responsible Sourcing Code of Conduct**

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## 1. Opening Remarks

The Hans Just Group upholds the highest ethical values and standards of integrity in its business activities and expects the same from our Suppliers. Hans Just Group is committed to establishing a framework of mutual respect, trust and cooperation with its Suppliers; accordingly, it has adopted this Responsible Sourcing Code of Conduct. We expect our suppliers to conduct their business in a responsible way and to comply with applicable laws, rules and regulations. If these standards differ from the applicable laws, rules and regulations, the highest standard will be applied.

## 2. Applies to

Hans Just Group Responsible Sourcing Code of Conduct applies to all Suppliers and outlines minimum standards within anticorruption and ethics, human rights and labour, health and safety and environmental management. Hans Just Group expects all suppliers to apply these, or equivalent standards, in their own supply chain. 'Suppliers' refers to suppliers of products and services as well as agents, distributors, wholesalers, technology partners, sales entities and contract manufacturers.

We expect Hans Just Group suppliers to have the necessary policies, processes and monitoring systems in place to comply with this Responsible Sourcing Code of Conduct, including but not limited to preventing and mitigating modern slavery and human trafficking in their own operation, business relationships and supply chain. Hans Just Group can terminate the business relationship or the agreement with the supplier due to the seriousness of an issue or repeated non-compliance with Hans Just Group Responsible Sourcing Code of Conduct.

## 3. Report a Concern

Suppliers are encouraged to have grievance mechanisms and access to remedy in place. The grievance procedures should be made available anonymously to all employees, workers in the supply chain, communities and give individuals the opportunity to raise concerns. Concerns shall be thoroughly investigated and result in timely and fair solutions to potentially affected stakeholders.

Further, suppliers should prevent any action to retaliate against employees, individuals and/or community members who use the system in good faith. Suppliers and their employees are also encouraged to raise questions or concerns to Hans Just Group anonymous reporting system.

Use Hans Just Group external link to report your concern:

<https://hansjust.whistlesystem.com/login/vNUZiH9uf1aDflC7EIG>

## 4. Business Ethics in General

Suppliers shall conduct their business in an ethical manner and act with integrity and ensure compliance with laws, rules and regulations applicable to their business.

### 4.1 Bribery, Fraud and Improper Advantages

Any form of corruption is strictly prohibited. Hans Just Group have a zero-tolerance towards bribery, Fraud and corruption in business and will not tolerate any form of corruption, fraudulent behaviour, or practices contrary to our Responsible Sourcing Code of Conduct. Suppliers shall not solicit, accept, offer or pay bribes or facilitation payments during the performance of their business dealings.

### 4.2 Conflicts of Interest

Suppliers shall declare any conflict of interest that may affect the performance of tasks or provision of services to Hans Just Group.

### 4.3 Fair Competition

Suppliers shall conduct their business in line with all applicable competition laws and regulations. Accordingly, Suppliers shall not enter into any agreements or understandings (whether express or implied) or

engage in any actions that illegally or improperly restrict trade or competition or violate antitrust and competition laws.

#### **4.4 Social Media and Digital Solutions**

Suppliers shall use social media and digital solutions in a compliant way and support the responsible use of digital solutions and new technologies.

#### **4.5 Third Parties**

Suppliers must carefully and thoroughly scrutinise, select and monitor the third parties they use and who will act for or on behalf of Hans Just Group. Accordingly, Hans Just Group expects Suppliers to perform appropriate screening and background checks on their counterparties to guarantee the integrity of their supply chain, considering the activity, origin and government interaction of such third parties. They must use extra caution and exercise due diligence in order not to take part, directly or indirectly, in any transactions or dealings with individuals, entities, or countries subject to sanctions under applicable international trade restrictions or sanctions programs.

Third parties, contractors, agents, or subcontractors should be selected based on merit and a fair and competitive selection process, avoiding any practices that can compromise this process. Suppliers shall be held responsible for ensuring their third parties comply with this Responsible Sourcing Code of Conduct and applicable standards and policies concerning business conducted for or on behalf of Hans Just Group.

#### **4.6 Export Control & Sanctions**

Suppliers shall comply with all applicable export control, customs and foreign trade regulations. Traded goods or services must be in conformance with national and international foreign trade and customs requirements, including any embargos, sanctions or directives.

#### **4.7 Responsible Sourcing of Minerals including Conflict Minerals**

Suppliers shall ensure that all final products, parts, and components delivered to Hans Just Group comply with all applicable laws and regulations regarding the responsible sourcing of minerals from conflict-affected or high-risk areas. Moreover, Suppliers shall reasonably assure that all conflict, or responsible minerals or metals including but not limited to tantalum, tin, tungsten, gold, cobalt and mica in the final products, parts and components delivered to Hans Just Group, do not directly or indirectly benefit armed groups that commit human rights abuses in conflict affected and high-risk areas.

#### **4.8 Product Chemical**

Suppliers shall ensure that all final products, parts and components delivered to Hans Just Group comply with all applicable laws, regulations and directives regarding the prohibition and restriction of substances, including hazardous substances.

#### **4.9 Audits**

Hans Just Group reserves the right to audit or review distributor compliance with this Code. We expect our Suppliers to provide full cooperation, as required in any inspections or audits conducted by Hans Just Group or on behalf of Hans Just Group. We understand that suppliers may face difficulties in conforming with these standards. If so, they shall inform Hans Just Group and together we will develop an improvement plan with corrective actions that advances supplier performance over time.

## **5. Human & Labour Rights**

Hans Just Group expects its Suppliers to be committed to meeting the responsibility to respect human rights throughout their own our operations and value chains as defined by the UN Guiding Principles on Business and Human Rights. The human rights commitment refers to all internationally recognised human rights. This includes all human rights at a minimum as stated in the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Suppliers should strictly prohibit the use of any form of child labour, forced and bonded labour or the trafficking in persons across all own our operations and value chain.

Hans Just Group suppliers are expected not to be directly or indirectly involved in any human rights violations at any stage of their business activities. To achieve this, the supplier is expected to conduct its own due diligence appropriate to its size and circumstances to prevent and address impacts on human rights linked to its business activity.

## **5.1 Child Labour and Employment of Minors**

Suppliers shall not recruit or employ child labour. The minimum age of workers shall be 15 years, or the minimum age as set by national laws, whichever is higher. All legal requirements regarding employment of young workers, meaning those above the minimum age and below the age of 18, shall be followed.

## **5.2 Employment Conditions**

Suppliers shall provide a written employment contract for their employees, outlining the terms of employment, meeting industry standards and/ or applicable collective bargaining agreements in the relevant country.

Contracts are required to be in a language understandable to the worker, mutually agreed to and signed by the employer and employee.

## **5.3 Equality, Harassment and Discrimination**

Suppliers shall treat their employees with dignity and respect, and any form of discrimination is strictly prohibited. The supplier shall promote equal opportunity in the workplace and base employment decisions on merit and qualifications. That is, Suppliers must prohibit any discriminatory practices based on race, age, gender or gender expression, marital status, sexual orientation, nationality, social or ethnic origin, ideology or political affiliation, religion, disability, health condition, pregnancy or any other mental or physical disability or social status. All individuals shall receive fair and equal treatment. Suppliers are encouraged to create and implement policies and procedures that embrace diversity, equity and inclusion practices.

Supplier shall commit to a safe and inclusive workplace free of abuse and harassment. Any harsh or inhumane treatment or the threat of such treatment, including but not limited to physical, psychological, verbal, sexual or any other kind of harassment shall be prohibited.

## **5.4 Freedom of Association and Collective Bargaining**

Suppliers must respect their employees' right to associate freely, to join or refrain from joining labour unions and without fear of discrimination or retaliation. If freedom of association and collective bargaining is restricted by laws and regulations in the relevant country, the employees shall be free to develop parallel means for independent and free association and collective bargaining.

## **5.5 Working Hours**

Suppliers must always ensure that working hours follow applicable laws and regulations in the relevant country. Regardless of legislation, regular working hours limit shall never be set to more than 48 hours per week, with an overtime limit of max 60 hours per week. This limit may only be exceeded in emergencies or exceptional situations. All workers are entitled to at least 24 consecutive hours of rest in every seven-day period.

## **5.6 Living Wage**

Suppliers shall ensure that all employees earn sufficient income in a standard working week to, at a minimum, meet their basic needs (and those of their families) and to provide some discretionary income. The supplier shall provide wages and benefits that comply with applicable laws and regulations and/or applicable collective bargaining agreements in the relevant country, which includes basic wages, benefits and overtime. Wages shall be paid on time and within the timeframe, and form agreed, or following local laws and regulations.

## **5.7 Leave**

Suppliers shall provide rest-periods, breaks and leave for all our employees. Leave includes vacation and holiday leave, sickness leave and parental leave.

## **5.8 Data Privacy**

Suppliers must respect and secure the right to privacy of their employees and stakeholders. Personal employee data must be processed lawfully and fairly and Suppliers must at all times ensure compliance with data privacy law, rules and regulations. Suppliers shall collect, use, and process personal data for legitimate business purposes only and handle personal data responsibly and, in a manner, compatible with the original purpose. Suppliers shall conduct data processing within the framework of their contractual relationship with Hans Just Group and not discuss, disclose, transfer, release or share any confidential information or personal data related to Hans Just Group without written consent.

## **6. Health & Safety**

Hans Just Group is committed to providing a safe, secure, and healthy workplace for all our employees and other persons working at or visiting our offices or facilities. We expect the same from our suppliers and that they work systematically on providing workers with safe and healthy work conditions. This includes, as a minimum, that safety incidents are recorded and that suppliers pro-actively work on reducing hazards beyond the legal obligation, if relevant, to protect the health and safety of employees. Hazards include but are not limited to occupational health and safety, emergency readiness, and access to clean water, sanitation and hygiene facilities.

## **7. Environment**

Hans Just Group is committed to the environment. Accordingly, we expect that our suppliers conduct their business in an environmentally sound and responsible manner and abide by all applicable laws and regulations in the countries where they operate. Suppliers shall proactively manage their major environmental risks and most relevant aspects (e.g., materials/packaging, energy, water, emissions/effluents). Environmental risk management should as a minimum include mapping of the major risks and implementation of risk mitigation actions. Management of the most relevant environmental aspects should as a minimum include problem identification and implementation of actions to reduce negative environmental impacts.

## **8. Corporate Due Diligence Duty**

Hans Just Group expect their Suppliers to carry out due diligence. This process must be implemented to meet current legal requirements and include identification, prevention, and mitigation, ending and minimisation of potential or actual adverse human rights and environmental impacts connected with own operations. Finally, the Supplier shall communicate how impacts are addressed.