

















# **Policy Statement Fackelmann Brands**

What started as a small factory representative for ironmongery in 1919 has developed into an internationally operating family company with more than 40 business units worldwide over the years. Today, Fackelmann Brands as a leading manufacturer stands for kitchen aids, household goods, bathroom furniture and much more - and thanks to the wide product variety of more than 10,000 articles, is guaranteed to be found in every home.

Our corporate philosophy as well as our values form the basis for the cooperation with our employees, customers, suppliers, partners and society. In our policy statement we give you an insight into our way of doing business and our expectations concerning a cooperation with Fackelmann Brands.

## **Business Ethics**

The passion and experience of our Fackelmann Brands family can be found in each of our products. We focus on material quality and functionality so that we create real value in the everyday lives of our customers. To this end, we search for new kinds of materials in product development that meet our quality standards and future requirements. In the household sector, we focus on materials without complex compositions and from demonstrably safe and transparent sources. In order to reduce the consumption of fossil raw materials, we focus on switching to materials that are made entirely or at least partially from renewable or recycled raw materials. In the production of our bathroom furniture, we pay attention to high-quality chipboard and MDF boards, which we process in Hersbruck. The forests of origin of the wood used are under strict observation. The quality and sourcing of accessories such as fittings, mirrors and electronic components is always subjected to testing.

We foster an open corporate culture – with respect for each other and the opportunity to develop potential freely. The health of our employees and the pursuit of continuous improvement in our processes play a central role for us. In Germany and at our more than 40 locations around the world, we focus on compliance with social standards and optimal working conditions for our employees, their further development and advancement, and the creation of a positive working environment. These standards are certified and audited by detailed internal audit systems and in the case of high-risk countries - by higher-level regulations such as the BSCI, which apply to the corporate family but also to all other participants in the supply chain. We are also in regular contact with them and our employees and share our experiences through transparent communication for the benefit of all stakeholders.

#### 1. The Foundation: Compliance with Laws and Conventions

Fackelmann Brands respects applicable laws and places a premium on economic, social and ecological sustainability. The company expects the same from its business partners, their employees and the entire supply chain. This is the case regardless of whether the laws, regulations, conventions or other specifications (referred to in the following as "laws") are domestic, foreign or international. The same applies to laws regarding health, human rights, security, the environment, competition, customs duties or individual or collective labour law, etc. Under the law, encouraging third parties to take illegal actions or participating in such actions is strictly prohibited. Confidential and sensitive information of any kind must be protected from unauthorized access by third parties. Within the company, business partners must ensure that confidential information is only passed on to employees who need it to perform their duties and who are under a corresponding obligation of confidentiality. The safekeeping of this information must be ensured by technical means at all times, among other things.

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Unsere Allgemeinen Vertriebs- sowie Einkaufsbedingungen finden Sie unter Downloads auf www.fackelmann.com



















### 2. Separation of Private and Corporate Interests

Fackelmann Brands' employees are obligated to make their business-related decisions in the best interest of Fackelmann Brands, without being influenced by personal interests. Therefore, business partners may not attempt to influence the personal interests of Fackelmann Brands employees. When deciding on whether to enter into a business relationship, Fackelmann Brands is guided only by objective criteria: in general, suppliers are only selected based on professional and objective criteria, in particular price, quality and the existence of a quality management system, reliability, technological standards, product suitability and a long-lasting business relationship which is free from conflict. In no event may personal relationships or interests influence the conclusion of a contract. Business partners must disclose existing and potential conflicts of interest.

### 3. No Violation of Anti-Corruption Laws

Strict regulations apply worldwide under international conventions which are designed to fight corruption by officials and public administration employees and in business transactions, meaning that even corrupt activities carried out abroad (fraud and taking bribes) are punishable under domestic law.

### 4. Protection of Trade Secrets

Confidential information as well as company and business secrets are subject to our confidentiality obligation. Confidential information is information that is marked as such as well as information that can be assumed not to be publicly known and that should not be made known or could harm other business partners. The obligation of confidentiality begins with the receipt of the request documents, during the duration of the contractual relationship as well as after its termination. Confidential and sensitive information of any kind shall be protected against unauthorized inspection by third parties.

## 5. Data Protection

Protecting all of the personal data of our employees, customers and business partners is highly important to us. Collecting, storing or processing this data is permitted only if this is necessary for defined, clear and legally permitted purposes.

### 6. Social Responsibility

Fackelmann Brands expects its business partners to comply with internationally recognized human rights, in compliance with applicable laws.

## 7. Environmental Protection

Fackelmann Brands strives to use environmental resources as carefully as possible, to avoid harm to people and the environment, and to improve all of its processes and procedures continuously, with the goal of further reducing environmental impacts.

## **Supply Chain Management**

Our goal is to combine economic success with responsible action toward the environment, people and society – along the entire value chain. To achieve this, we require our direct suppliers to adhere to environmental and social standards. Sustainable supply chain management also offers many opportunities: Through our commitment we can help to establish sustainable business practices in the markets – and thus make a valuable contribution to respecting and safeguarding human rights as well as protecting the environment and the climate.

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### **Code of Conduct for Suppliers** 1.

In this document we record our desired supplier relationship. It serves as an instrument for specifying the way in which products are manufactured. Products must be manufactured in a way that is socially and ecologically compatible with nature. For 2023, we would like to take the opportunity of looking at and revising the Code of Conduct again.

Our current Code of Conduct can be found here: www.fackelmann.com/download

#### 2. **Self-disclosure for Suppliers**

In addition to our Code of Conduct, we carried out another project regarding the efficient design of our supply chain in 2022. In this project, a supplier self-disclosure was developed which will be helpful for us with regards to the upcoming Supply Chain Act. Suppliers must provide detailed information in a structured form on various aspects of their business - for example, on their upstream supply chain, their production conditions, as well as quality management and assurance. We also require information on social aspects and environmental issues which suppliers have committed themselves to implementing in advance in the Code of Conduct. The self-disclosure is reviewed and evaluated by the specialist departments.

#### **Personal Contact** 3

Despite modern means of communication, we (colleagues in the Far East) are present at our suppliers' premises. Open and transparent communication at eye level with our partners is important to us. Without a local presence it is hardly possible to purchase products from Western Europe, e.g. in Asia. Our own local purchasing organization gives us the opportunity to supervise our production plants as well as our suppliers personally and continuously and to monitor and, if necessary, intervene in the processes. Structured quality controls on site at our production plants as well as at our suppliers are an important building block for a trusting and transparent supplier relationship.

### 4. **Supplier Evaluation**

All factors of cooperation - e.g. quality, transparency, communication - are included in a comprehensive supplier evaluation. We revise this process continuously to ensure that we can promptly identify deviations and initiate countermeasures. If suppliers do not meet the requirements or do not work visibly and sustainably on compliance or improvements, we terminate the collaboration. For suppliers in high-risk countries, the evaluation also includes certification in accordance with the amfori Business Social Compliance Initiative.

#### 5. **Indications of Violations**

If the suppliers become aware of violations of these principles of conduct through their own actions, those of their employees or employees of Fackelmann Brands, Fackelmann Brands expects to be informed immediately. The suppliers have the possibility to report this violation either to the contact persons at Fackelmann Brands, to their superiors or to the Compliance Officer (compliance@fackelmann.de). If the suppliers assume that disadvantages will result from the notification, they can ask for an initially confidential investigation of the possible violation when notifying the Compliance Officer.

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