

Code of Conduct
Création Gross GmbH & Co. KG

July 2023

Content

Voluntary commitment	3
up	3
Preamble	4
1. human rights and labour standards	5
1.1 employment relationships	5
1.2 prohibition of child labour and protection of young workers	5
1.3 prohibition of forced labour	5
1.4 adequate remuneration	6
1.5 working hours	6
1.6 freedom of association.....	6
1.7 diversity and inclusion, ban on discrimination	7
1.8 health and safety at work	7
2. environmental responsibility	7
2.1 protection of environment, climate, and effect on human beings.....	7
2.2 animal and species protection	8
3. ethical business practices and integrity	8
3.1 compliance with business integrity	8
3.1.1. corruption	8
3.1.2. money laundering.....	8
3.1.3. land usage / trade control.....	9
3.2 fair competition	9
3.3 personal data, protection of confidential information and intellectual property	9
3.4 customer interests.....	9
4. implementation	9
4.1 communication and training.....	9
4.2 expectations of our supply chains, control measures	9
4.3 notice regarding violations.....	10
5. improvement program / anonymous grievance procedure	10

Voluntary commitment

We Création Gross GmbH & Co. KG (further on: Création Gross) declare with our signature that we share the objectives and contents of the Code of Conduct and will make every appropriate and reasonable effort, within the scope of our opportunities, to comply with the voluntary commitment on an ongoing basis at all our company locations.

We communicate the contents of the Code of Conduct to our employees, business partners and other key stakeholders.

We expect from our employees, business partners and other key stakeholders to act in line with the contents of the Code of Conduct encourage them to demand this expectation from the contractual partners in their supply chain.

We take any violation of the Code of Conduct seriously.

We encourage our employees, business partners and all other persons to submit reports on potential violations using the following contact information:

Contact:

name of the reporting office: Création Gross GmbH & Co. KG

Houbirgstraße 7

D-91217 Hersbruck

e-mail: info@creationgross.com

phone: +49 9151 736 0

website: www.creationgross.com

place/date: Hersbruck, July 2023



signature

Thomas Steinhart, Managing Partner, Création Gross GmbH & Co.KG

Preamble

Our actions are guided by integrity. This extends to our dealings with customers and suppliers, employees, shareholders, and the public. Both our strategic considerations and our day-to-day business are always based on high ethical and legal standards. Everyone at Création Gross shapes the style and thus the image of the company, both internally and externally, through his or her personal appearance, actions, and behaviour. Inappropriate behaviour by even one employee can cause considerable damage to the company. We are all required to pay attention to the public image of our company. Honesty, sincerity, and fairness are the benchmarks for our dealings with each other and with our partners and the public.

Because sustainable growth is the goal of our work, we at Création Gross are not only interested in results, but also in how these results are achieved. We do not tolerate unlawful or unfair means to achieve our goals, nor do we tolerate discriminatory behaviour. Our Compliance Policy contains binding rules that apply equally to all of us. It obligates us to act accordingly and to refrain from anything that contradicts these rules.

As a standard requirement for doing business with Création Gross, we expect our business partners to observe and protect as a minimum the following fundamental employee rights, safety and health regulations, environmental protection, Ethical business behaviour and legal requirements.

International regulations and guidelines serve as the basis for the ILO core labour standards, sustainability principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises.

Création Gross appoints its own CSR manager for CSR matters.

A separate process has been defined to monitor compliance with our standards. The basis for this is the regular risk analysis. Thereon supplier management and supplier monitoring were implemented in the company to ensure the highest possible transparency in the supply chain. According to our defined selection matrix, regular production assessments are carried out on several suppliers to ensure that problems and potentials are identified as early as possible.

Management Practice

The social standards as defined in this Code shall be acknowledged by the management of any business partner and shall be incorporated in their corresponding company policies. Employees shall be informed about the contents of this Code and/or the applicable national/international laws must not be avoided by using contacting arrangements, false apprenticeship schemes or similar measures.

To meet all the requirements, set forth in this Code and national/international laws, employers shall establish a minimum set of management functions. Employers shall appoint personnel in charge of issues such as human resources/recruitment, legal requirements, occupational safety and health, production planning and other sensitive issues at production level. Business partners shall maintain adequate records to demonstrate compliance with this Code and national/international laws.

In the event of conflicts of interest, an anonymous grievance mechanism system is available (see *Improvement Program*).

We share the objectives of the Code of Conduct and will make every appropriate and reasonable effort, within the scope of our respective legal and actual opportunities, to comply with the voluntary commitment on an ongoing basis at all our company locations in Germany and abroad. Where national regulations contradict the contents of the Code of Conduct or the domestic context makes it impossible to fully comply with them, we will look for ways to nevertheless uphold the requirements of the Code of Conduct wherever possible.

Responsible person: Thomas Steinhart, Managing Partner

[up](#)

1. human rights and labour standards

1.1 employment relationships

We appreciate our employees. We reject any form of unlawful punishment, abuse, harassment, intimidation or other undignified treatment towards workers. We abide by the applicable labour law in all employment relationships and expect the same from our contractual partners. At the beginning of the employment relationship workers shall be provided with comprehensible information about the essential terms and conditions of employment, including their rights and duties, as well as the working hours, remuneration and payment arrangements and modalities. We respect and protect the right of employees to terminate their employment in accordance with the applicable notice period.

Business partners shall conclude a written employment contract with their employees. Contracts must be lawful, in workers' language, and do not contain provisions that place unreasonable restrictions on the movement of workers and prevent workers from terminating the employment. ILO conventions C158 (*termination of employment convention*), C175 (*part-time worker convention*) and, if applicable C177 (*home-work convention*), C181 (*private employment agencies convention*), C97 (*migration for employment convention(revised)*) and C143 (*migrant workers (supplementary provisions) convention*) shall apply. [up](#)

1.2 prohibition of child labour and protection of young workers

There shall be no use of child labour. Child labour is defined as any work by a child or young person younger than the age specified by "child" or "young person" below, which does not comply with the provisions of the relevant International Labour Organization (ILO) standards, and any work that is likely to be hazardous or to interfere with the child's or young persons' education or to be harmful to the child's or young persons' health or physical, spiritual, moral or social development. Relevant ILO Convention include C138 (*minimum age convention*) and C182 (*worst forms of child labour conventions*).

There is a ban on the worst forms of child labour for those under 18 (slavery and practices similar to slavery; prostitution; illicit activities such as drug trafficking; work harmful to the health, safety, or morals of children)

The minimum age of admission to employment shall not be less than the age of completion of compulsory schooling, and, in any case, not less than 15 years unless local minimum age law stipulates higher age for work or mandatory schooling, in which case the higher age shall apply. If local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO convention C138 (*minimum age convention*), the lower will apply.

Young person is defined as any worker over the age of child as defined above and under the age of 18. All business partners are required to comply with all legal restrictions placed on these workers, including work in a prohibited job working hour limits, annual medical check-ups and taking all necessary precautions to ensure these workers are protected from working conditions likely to endanger their health, safety, or their moral integrity, and/or which harm their physical, mental, spiritual moral or social development.

The national regulations for the protection of young employees shall be complied with.

ILO Conventions C079 (*night work of young person convention*), C138 (*minimum age convention*), C142 (*human resources development convention*), C182 (*worst form of child labour convention*) and ILO recommendation R146 (*minimum age recommendation*) and R190 (*worst form of child labour recommendation*) shall apply. [up](#)

1.3 prohibition of forced labour

Business partners must commit to uphold the human rights of employees, to treat them with dignity and respect and to improve working conditions within their supply chain. The following labour standards were created to help facilitate improved working conditions for those producing our products.

Employment must be freely chosen. There is a prohibition of slavery, practices similar slavery, servitude, oppression through economic or sexual exploitation. The workers must have the right to leave their work and freely terminate their employment. Business partners shall not employ any form of forced, bonded, indentured, trafficked, non-voluntary labour or otherwise unfree labour. Workers are not forced to work against their will, ability or in a manner outside the provisions of the labour contract. Business partners must not adopt any recruitment or employment practice that use bonded labour, including workers deductions as a repayment of a bond or payment to a third party.

Création Gross prohibits, that its goods are made by using prison or detained labour in any form. ILO Conventions C029 (*forced labour convention*) and C105 (*abolition of forced labour convention*) shall apply. [up](#)

1.4 adequate remuneration

Wages paid for a standard work week shall meet at least at a minimum, national legal standards, or industrial benchmark standard, whichever of the two is higher. ILO Conventions C95 (*protection of wages convention*) and C131 (*minimum wage fixing convention*) shall apply.

Employees must receive at least all legally mandated benefits. All overtime hours shall be reimbursed at a premium rate according to legal or industry standards, whichever is higher.

Deductions from wages for disciplinary purposes are not permitted. All disciplinary measures should be recorded to demonstrate compliance. Employees shall receive full information on the composition of their wages, including deductions and benefits in an easily understandable way.

Provide benefits as required by law, including public holidays, paid leaves, social insurance, and medical benefits. All contributions which are based on, and deducted from workers' wages, must be set out in the payrolls and workers' pay slips. Pay slips must be in the local language for each pay period that details items such as regular working hours/days, overtime hours, piece rate wages (if applicable), gross wages, deductions, and net wages.

All wages shall be paid fully and promptly and in a timely manner, based on the law, and in the form of local currency.

Employees of equal work should receive equal pay. The absence of equal pay constitutes discrimination. ILO convention C100 (*equal remuneration convention*) shall apply. [up](#)

1.5 working hours

Working hours shall comply with applicable laws and industry standards, whichever of the two is more stringent and affords greater protection to ensure the health, safety, and welfare of the workers.

On no account shall employees be required to work more than 48 hours per week on a regular basis.

Overtime shall be done on a voluntary basis, must not exceed 12 hours per day, six days per week for a total of 72 hours and must not be demanded on a regular basis. Employees' shall have at least one day off after six consecutive days of working. ILO Conventions C001 (*hours of work(industry) convention*) and C014 (*weekly rest (industry) convention*) shall apply.

Legally mandated breaks must be provided.

Production partners use a reliable time recording system, all hours are tracked, and timecards accurately reflect the real working hour situation. If manual attendance system is used, it should lie down in and out time for all employees, including actual start time, breaks, end times, as well as sick days and leaves. [up](#)

1.6 freedom of association

The employees' right to form or join workers' organization including unions of their own choice and to bargain collectively shall be recognized. ILO Conventions C087 (*freedom of association and protection of the right to organize convention*) and C098 (*right to organize and collective bargaining convention*) shall apply.

In those situations, in which the rights to freedom of association and collective bargaining are restricted by law, alternative means of independent and free organization and bargaining shall be allowed. ILO convention C154 (*collective bargaining convention*) shall apply.

Workers' representative shall be protected against discrimination and be provided free access to the workplaces to ensure that they can exercise their rights in a lawful and peaceful way. and C135 (*workers representatives convention*) and ILO Recommendation R143 (*workers representatives' recommendation*) shall apply.

Private or public security personnel present on site must be instructed and trained on the rights of the employees. The employees' rights must not be restricted under any circumstances. [up](#)

1.7 diversity and inclusion, ban on discrimination

We promote an inclusive work environment that values the diversity of our employees. Business partners shall not discriminate, support or tolerate discrimination in employment, including recruitment, hiring, training, working conditions, job assignment, compensation, benefits, promotions, disciplinary action, termination or retirement on the basis of, for example, national and ethnic origin, social background, health status, disability, sexual orientation, age, political affiliation, religion, gender, marital status, race, caste, health, disease, pregnancy, nationality, membership in employee organizations including trade unions, other personal characteristics.

ILO Conventions C100 (*equal remuneration convention*), C111 (*discrimination (employment and occupation) convention*), C159 (*vocational rehabilitation and employment (disabled persons) convention*) and C183 (*maternity protection convention*) shall apply.

We are committed to equal opportunities and respect the principle of equal pay for employees of all genders for work of equal value. [up](#)

1.8 health and safety at work

The business partner is aware of industry best practices and has a strategy and plan to achieve the higher standards, to the extent reasonably possible, based on continuous improvement. This strategy is effectively communicated to all workers.

We prohibit disregard for health and safety standards applicable in the workplace (inadequate safety standards, lack of appropriate protective measures, lack of measures to prevent excessive physical and mental fatigue - working hours and rest breaks, inadequate training, and instruction).

The workplace shall not be detrimental to the health and safety of workers. A safe and hygienic working environment shall be provided, considering the level of knowledge of the industry and specific hazards. Vulnerable persons, such as young workers, expectant and new mothers, and persons with disabilities, shall be given special protection. ILO Convention C155 (*occupational safety and health convention*) and ILO Recommendation R164 (*occupational safety and health recommendation*) shall apply.

The business partner (a representative) should be appointed to ensure health and safety, including fire safety, at the workplace. This person has knowledge of the production premises and monitors them regularly to ensure compliance with all local health and safety legislation and internal policies/procedures. The designee is responsible for ensuring that all training is provided to ensure worker safety.

Business partners must ensure that systems are in place to identify, assess, prevent, and respond to potential hazards to worker health and safety. They must take effective measures to prevent workers from suffering accidents, injuries or illnesses arising from, related to, or occurring during work. These measures should aim to minimize the causes of workplace hazards as much as possible. Business partners respect the right of workers to leave the premises in case of imminent danger without asking for permission.

All existing and legally required documents (health and safety permits) e.g. certificates/approvals of electrics, boilers, operator licenses and fire protection must be kept.

Business partners must always provide effective personal protective equipment (PPE) free of charge to all workers and instruct them in its use and effectiveness. Access to potable water and, where appropriate, sanitary facilities for food storage must be provided. [up](#)

2. environmental responsibility

2.1 protection of environment, climate, and effect on human beings

Creation Gross, our employees, business partners and other key stakeholders adverse effects on environment and natural resources are to be minimized while safeguarding the health and safety of the public. At a minimum all relevant local and national environmental protection law should be met with a goal to meet international environment protection standards. Any harmful soil changes, water pollution, air pollution, harmful noise emissions, excessive water consumption are prohibited.

All required environmental permits, approvals and registrations are to be obtained, maintained, and kept current. Operational and reporting requirements are to be followed.

All applicable laws, regulations and requirements must be adhered regarding prohibition or restriction of specific substances.

It applies:

- the ban on the production of mercury-added products, the use of mercury and its compounds or the treatment of mercury waste in accordance with the Minamata convention.
- the prohibition of the production and use of chemicals in accordance with the POP convention and the REACH regulation.
- the prohibition of non-environmentally sound handling, collection, storage, and disposal of wastes in accordance with the POP convention.
- the prohibition of export of hazardous wastes in accordance with the Basel Convention
- the prohibition of import of hazardous wastes from non-Parties to the Basel Convention. [up](#)

2.2 animal and species protection

We respect the principles of animal welfare and biodiversity and align our corporate actions accordingly. The keeping and use of animals must comply with the applicable legal animal welfare requirements and be appropriate to the species. The Washington Convention on International Trade in Endangered Species of Wild Fauna and Flora shall be complied with. [up](#)

3. ethical business practices and integrity

We pursue only legitimate business objectives and practices. We build and maintain business relationships only with reputable partners. We behave in a fair and appreciative manner towards our business partners and customers. We respect the different legal, economic, social, and cultural backgrounds and circumstances of the countries and regions in which we operate. We always base our entrepreneurial actions on universally valid ethical values and principles, including integrity and respect for human dignity. We support free and fair world trade and abide by the laws and regulations of the countries and regions in which we do business.

The legal requirements of the countries shall be completely fulfilled. Business licenses and other documents shall be in order and up to date. Changes of the local law should be recognized and understood. Changes and implications should be communicated to all workers. Production staff must ensure that the necessary changes and implementations are made in a timely manner to ensure compliance with the law. [up](#)

3.1 compliance with business integrity

3.1.1. corruption

Business must be carried out with degree of ethics, honesty, and fair dealing. The business partners shall not be engaged in threats, bribery, or corruption practices. The offering, paying, or accepting of bribes or kickbacks including facilitation payments is strictly forbidden. There shall not be offered any compensation of any value (gifts, discounts, services, loans, facilitation payments) to employees of **Creation Gross**, workers, service providers or government/political official to influence any act of decision to secure a business advantage. There must be anti-corruption and bribery policies and procedures to commit persons of bribery or corruption. The contractor should implement these procedures into business and review them regularly to ensure that they are operating effectively. [up](#)

3.1.2. money laundering

The contractor does not undertake any activities that violate the internationally applicable money laundering law. They are responsible for ensuring that money laundering is prevented in their companies by taking appropriate organizational measures. [up](#)

3.1.3. land usage / trade control

The prohibition of unlawful eviction and unlawful deprivation of land applies.

[up](#)

3.2 fair competition

Création Gross is fully committed to competition by fair means and to strict compliance with antitrust laws. Even the appearance of own conduct restrictive of competition must be avoided. Every contractor is obliged to comply with the rules of fair competition. In the event of external misconduct, the management must be informed. In principle, all agreements between companies that restrict competition are prohibited. Even a mere exchange of information may be prohibited.

[up](#)

3.3 personal data, protection of confidential information and intellectual property

We respect the privacy rights of our employees, business partners and customers and adhere to the applicable data protection and security requirements and regulations when handling personal information. We take great care to ensure that commercial secrets and other confidential information that our business partners and customers entrust to us are adequately protected from unauthorised acquisition, use and disclosure, at least in accordance with the relevant legal provisions for the protection of business secrets. We respect the intellectual property of our business partners, customers and other third parties. We ensure that sufficient precautions are taken to protect intellectual property rights when transferring expertise and technologies.

Confidential information must be handled in accordance with data protection under DsGVO.

[up](#)

3.4 customer interests

Where our products and services concern the interests of consumers, we have taken appropriate measures to ensure the safety and quality of the products or services we offer. We ensure that our products or services comply with the relevant statutory consumer protection regulations. As part of our information and distribution activities, we take consumer interests into account by applying fair business, marketing and advertising practices and promoting consumer education. We pay particular attention to the interests of children, senior citizens, people with disabilities and other vulnerable consumer groups.

[up](#)

4. implementation

We make appropriate and reasonable efforts to comply with the contents of the Code of Conduct on an ongoing basis at all our company's locations. We have set up suitable measures and processes for this purpose and document their implementation within the company in an appropriate manner. The executive management is kept informed at regular intervals about the implementation and work of the responsible bodies and persons.

[up](#)

4.1 communication and training

We communicate the contents of the Code of Conduct to our employees, business partners and other key stakeholders and train our employees on relevant topics as required. We expect our employees to comply with the Code of Conduct.

[up](#)

4.2 expectations of our supply chains, control measures

The Code of Conduct also reflect our expectations of our supply partners and other contractual partners in our supply chains. In this respect, we expect them to comply with the contents of the Code of Conduct or to apply a comparable code of conduct. We encourage our business partners to demand this expectation from the contractual partners in their supply chain. We value long-term business relationships based on partnership. We therefore identify and verify our contractual partners in an appropriate manner before entering a supply relationship, e.g., through self-disclosure, supplier evaluation or similar. We reserve the right to monitor our supply partners' compliance with our expectations, e.g., by means of auditing. Should serious violations be identified, we reserve the right to appropriate contractual consequences, including termination of the business relationship. In any case, we expect that any violations that are identified will be dealt with by appropriate preventive or remedial measures.

[up](#)

4.3 notice regarding violations

We take any violation of the Code of Conduct seriously. In the case of reports of possible violations, we shall take follow-up measures for proper and confidential clarification and, if necessary, appropriate preventive or remedial measures. [up](#)

5. improvement program / anonymous grievance procedure

With the establishment of the Improvement Program, the Création Gross creates a platform that serves to indicate optimization possibilities and to report violations of legal regulations, specifications from the company regulations or other guidelines of Création Gross.

Contact:

Création Gross GmbH & Co. KG

Department Sustainability & Innovation

Houbirgstrasse 7

D-91217 Hersbruck

Phone: +49 9151 736 152

Mobile: +49 174 688 37 49

E-Mail: improvement@creationgross.com

Every report matters.

We would like to explicitly encourage the reporting of violations of legal regulations, the requirements from the company regulations or other Création Gross guidelines - in the interest of honest employees and for the protection of the company.

More information at: www.creationgross.com

[up](#)

Formal Commitment & Declaration of Commitment to Compliance with the Création Gross Code of Conduct (CoC)

We hereby certify that we have received and taken note of the Création Gross Code of Conduct (CoC) as updated in July 2023.

We declare and confirm that we have taken note of and comply with the requirements specified in the Code and the applicable national/international laws in the countries in which we work directly or indirectly with manufacturers and/or subcontractors. Should there be any adequate corrective measures by the time the production is to start. We accept that we are not entitled to work with manufacturers and/or subcontractors whose name has not been communicated to Création Gross before the order placement.

We, the supplier, shall make sure that all manufacturers and subcontractors receive the Création Gross Code of Conduct (CoC), take note of it and comply with it as well all the applicable laws. We will provide this CoC to all employees in their corresponding national and/or regional language. The English version remains the only legally binding one.

Furthermore, we accept that Création Gross or an authorized representative is entitled to realize inspections with and/or without notice in any of the corresponding establishments/factories, incl. those of manufacturers and subcontractors. We acknowledge that we are expected to grant Création Gross and/or an authorized representative upon their request access to the business premises and workplaces at any time. In this context, we declare that it is always allowed to conduct interviews with any employee, within or outside the factory premises.

Hereby we confirm that any violation against this formal commitment can lead to the termination of our business relationship with Création Gross.

This document is an inseparably part of the contract. It must be signed by the management of business partners and returned to Création Gross GmbH & Co. KG together with the contract.

Supplier/Manufacturer Name: _____

Contact/Position: _____

Mail Address: _____

Phone Number: _____
(Complete number incl. Country and area code)

Date/Signature: _____

Company Stamp: _____