

## Code of Conduct

Julius Schulte Trebsen GmbH & Co. KG, Pauschwitz Str. 45, 04687 Trebsen

## Code of Conduct: Julius Schulte Trebsen GmbH & Co.KG

### I. Preamble

Julius Schulte Trebsen GmbH & Co. KG (hereinafter referred to as "JST") is committed to corporate social responsibility and responsible corporate governance. This Code of Conduct sets out the principles that govern our behaviour towards all stakeholders. It ensures that values and ethical standards are known, respected and adhered to by all business partners.

### II. General principles

#### 1. Legal compliance

All business partners are required to comply with all applicable laws, regulations, standards and other legal requirements, as well as relevant social rules.

#### 2. Industrial and trade secrets

All JST employees have a duty of confidentiality with respect to all company matters. This obligation continues even after employment has ended. Trade secrets of third parties must also be treated with appropriate confidentiality.

### III. Sustainability and the environment

As a family-run business since 1893, we think in terms of generations. Sustainability and care for nature are the basis for a liveable environment and quality products made from recycled paper.

With this in mind, we are committed to conserving resources and using environmentally friendly technologies, packaging and transport solutions.

We are taking concrete steps to reduce our overall energy consumption and associated carbon emissions.

Our energy and environmental management systems are certified according to DIN EN ISO 50001 and DIN EN ISO 14001 respectively. When selecting our raw materials, we observe the principles of sustainability. We prove this through various certifications such as FSC and RedCert.

In this spirit, we expect our business partners to:

- Operate at least within the local environmental limits and standards applicable to their operations.
- Obtain, maintain and follow the reporting guidelines of all required environmental permits and certifications to ensure legal compliance at all times.
- Monitor environmental impact, with a particular focus on biodiversity and pollution, and take action to improve it.
- Work with JST to continuously improve environmental performance by:
  - o Reducing greenhouse gas emissions and energy consumption through improved efficiency and
  - o Improving water quality and reducing waste.

#### **IV. Ethical and social principles**

JST sees itself as a traditional and down-to-earth family-run business with a strong sense of social responsibility for its employees and their families. That is why job security is a high priority in our business decisions.

We guarantee the international core labour standards (ILO – 1998) throughout the company.

##### **1. Working conditions and human rights**

JST explicitly supports internationally recognised human rights. This is also expected of all our business partners. This also includes the right to freedom of opinion and freedom of expression. JST also expects the legal right of employees to freedom of association and collective bargaining to be respected.

We expect our business partners not to use any form of forced labour, including forced labour in prisons and bonded labour. We also expect you to make sure that all your business partners reject child labour and all forms of exploitation of children and young people and comply with applicable laws.

## **2. Discrimination**

The way we treat each other is characterised by mutual recognition, appreciation, openness and tolerance. Employees in management positions, in particular, are aware of the role they play in setting an example, and take their social responsibilities seriously. We have flat hierarchies and maintain open, collaborative and constructive working relationships at all levels. We systematically follow the internal communication channels. We express criticism openly, constructively and never in a hurtful or discriminatory manner. Complaints may be directed to the reporting office under the Whistleblower Protection Act (Hinweisgeberschutzgesetz, HinSchG). An internal inclusion officer and a reporting officer have also been appointed. This helps us ensure that our hiring and professional practices are non-discriminatory.

Every business partner must ensure the criteria of equality and equal opportunities for its employees and refrain from any form of discrimination. The business partner undertakes to prevent and actively combat any form of discrimination.

## **3. Occupational health and safety**

Our people are our most important asset – they make JST what it is, realise our visions and guarantee our future.

To ensure this remains the case, occupational health and safety is an integral part of our corporate philosophy. We believe that taking a health-conscious approach to work not only benefits everyone personally, but also contributes to our overall success. Health and safety in the workplace, accident prevention and plant safety are important to us and are therefore among the fundamental objectives of our company. All employees are required to comply at all times with all legal and company health and safety requirements. All stakeholders must comply with the relevant regulations.

Our business partners agree to provide and maintain a safe and healthy working environment for all employees.

## **4. Data protection and information security**

JST ensures compliance with the applicable data protection requirements and regulations when processing personal data. JST also ensures that information security requirements are met when processing the information of its business partners. Our business partners are also expected to comply with these data protection and information security regulations.



## **V. Competition law principles**

We are fully committed to fair competition with our market peers and competitors. We comply with all applicable antitrust and competition laws. We oppose agreements on prices, terms and conditions, as well as agreements that serve to restrict competition or to share markets and customers. We are committed to the principle of fair competition for all market participants. We maintain an open and respectful relationship with our business partners. We expect and promote transparent and lawful conduct of all company business and prohibit all forms of corruption and bribery.

JST employees may not offer or grant any improper benefits to business partners in the course of their work, or accept such benefits themselves.

## **VI. Dealing with reports and violations**

Complaints or reports of violations of the JST Code of Conduct may be made at any time, even anonymously, through the reporting office under the Whistleblower Protection Act. The purpose of this reporting system is to provide comprehensive protection to anyone who reports suspected violations of the law, internal policies or ethical standards. To this end, we have established an internal reporting office that is accessible to both our employees and external parties. The purpose of this reporting office is to ensure that all whistleblowers are protected from potential reprisals. The identity of whistleblowers will be kept confidential and every effort will be made to ensure that they are not disadvantaged as a result of making a report.

Contact:

Email: [hinweisgeber-meldung@schulte-trebsen.de](mailto:hinweisgeber-meldung@schulte-trebsen.de)

Internal reporting office: <https://schulte-trebsen.hinweisgeber-meldung.net/>

JST will carefully analyse every report we receive, regardless of the form in which we receive it. All business partners must guarantee that they will not take any adverse action or disciplinary measures against whistleblowers.

## **VII. Compliance with the Code of Conduct**

JST reserves the right to review compliance with the principles and requirements of this Code of Conduct. Any violation of these principles and requirements will be considered a threat to the contractual relationship on the part of the business partners and may lead to the termination of the collaboration if corrective measures are not sought and implemented.



Trebsen, 15 January 2024