

A woman in a blue t-shirt is working on a shoe in a factory setting. She is focused on her task, and the background shows other workers and machinery. The text 'HEALTH AT WORK EXPERIENCE SUSTAINABILITY' is overlaid on a green background in the top left corner.

HEALTH AT  
WORK  
EXPERIENCE  
SUSTAINABILITY

## CODE OF CONDUCT

At ATLAS<sup>®</sup>, we have a social responsibility for people and the environment. We undertake to manage our company in a fair and socially responsible manner by complying with all requirements of the international standard for social accountability (The SA8000 Standard), which is based on internationally recognised standards, including International Labour Organisation (ILO) conventions, the Universal Declaration of Human Rights and the UN Convention on Human Rights. We view the following social accountability requirements as specified by the SA8000 Standard as binding.



### **1. Prohibition of Child Labour and Protection of Young Employees**

We expect our business partners to commit to the effective abolition of child labour in accordance with ILO Convention No. 182. The respective, legal minimum age for admission to employment, which must not be under the age at which compulsory education ends and must not be under 15, according to ILO Convention No. 138 and Recommendation 146 and the United Nations Convention on the Rights of the Child, must be observed. Appropriate mechanisms for determining ages, implemented as part of our hiring process, prevent child labour. Youths aged 16 and over will only be employed if the conditions of the work they perform are not likely to jeopardise their health, safety and morals and if said youths have received appropriate, relevant instructions or vocational training in the respective economic branch. Employees under 18 years of age are excluded from working at night if this does not disrupt training requirements.

### **2. Prohibition of Forced and Compulsory Labour**

ATLAS® does not accept economic activities based on forced or compulsory labour, debt bondage or serfdom. This includes any kind of work or service demanded from a person under threat of punishment and for which said person has not volunteered their time and energy (compliance with ILO Convention No. 29 and ILO Convention No. 105 and the Universal Declaration of Human Rights). At any time, employees may exercise their right to terminate employment and leave the company. Neither we nor third parties that supply us with labour are allowed to demand fees for employment or to retain identity documents or money as a means of exerting pressure.

### **3. Health and Safety**

Applicable legal regulations on occupational health and safety as well as on building security and fire protection must be complied with to minimise the risk of accidents and occupational disease. Wherever necessary and appropriate, employees are provided suitable personal protective equipment. In acute hazardous situations, employees have the right and the duty to leave their work stations immediately and without explicit permission. People with special needs, such as young employees, young mothers and pregnant women as well as people with disabilities, receive particular protection. Our principles include ILO Convention No. 155 and Recommendation No. 164 (Occupational Safety and Health), ILO Convention No. 159 (Vocational Rehabilitation and Employment (Disabled Persons)) and ILO Convention 183 (Maternity Protection).

### **4. Freedom of Association and Right to Collective Bargaining**

All ATLAS® business partners have the rights of association, to open communication, direct engagement as well as humane and just treatment in accordance with ILO Convention No. 87 (Freedom of Association), ILO Convention No. 98 (Right to Organise and Collective Bargaining) and ILO Convention No. 135 (Worker's Representatives).

### **5. Prohibition of Discrimination in Employment and Occupation**

ATLAS® and its business partners refrain from any kind of discrimination, exclusion or preference regarding occupation (including hiring, wages, ancillary pay, promotions, disciplinary measures, termination or retirement) that is based on gender, race, religion, age, disabilities, sexual orientation, national, social or ethnic origin and which results in the abolition or restriction of equal circumstances or treatment. Our business partners respect ILO Convention No. 100 (Equal Remuneration) and 111 (Discrimination (Employment and Occupation)), the UN Convention on the Elimination of All Forms of Discrimination Against Women and the UN Convention on the Elimination of All Forms of Racial Discrimination.

### **6. Disciplinary Practices**

Employees are to be treated with dignity and respect. Guidance is provided by the UN Guiding Principles on Economic Reforms and Human Rights, the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights. Any kind of inhumane treatment, abuse, harassment and intimidation as well as illegal punishment of employees is prohibited and will not be tolerated. Potential disciplinary measures are recorded in writing and in a form that employees can easily understand.

### **7. Working Hours**

Our business partners comply with the respective national legislations, current collective and works agreements and prevalent industry standards on the regulation of regular working hours, break times, days off and overtime. They likewise protect the right of their employees to terminate their employment, subject to the respective, relevant period of notice. Our actions are guided by agreements including ILO Convention No. 102 (Social Security (Minimum Standards)) and ILO Convention No. 1 (Hours of Work (Industry)) and Recommendation No. 116 (Reduction of Hours of Work).

### **8. Remuneration**

All ATLAS® business partners must comply with the respective legal regulations and/or applicable collective and works agreements for a living wage and ancillary pay and ILO Convention No. 131 (Minimum Wage Fixing). Minimum wages will not fall below legal minimum wages. Wages will not be retained and will be paid regularly and in a manner suited to the employees. Wage deductions are only permissible within the frameworks of legal regulations and collective agreements and must be indicated as such. Employees are regularly informed on the composition of their pay. Employees are provided with comprehensible information on key work requirements, including working hours, remuneration as well as the terms of payment and accounting. Salaries and ancillary pay must always suffice to meet basic needs. Under no circumstances are wage deductions permissible disciplinary practices.

## 9. Management system

All ATLAS® business partners must introduce or establish a management system that supports the content of this Code of Conduct. This system must be reviewed annually and drives continuous improvement. This management system supports our business partners in meeting the aforementioned requirements. Management systems must be designed to ensure a) compliance with applicable laws, regulations and customer requirements regarding the business partners' operations and products; b) compliance with this Code of Conduct; and c) that operational risks in the areas covered by these requirements are identified and minimised.

## 10. Overarching Principles

### 10.1 Environment

As our integrated management system also includes certification in accordance with ISO 14001, each of our business partners must also have established an environmental management system in accordance with ISO 14001 or a corresponding standard. The environmental management system must be implemented and must work. We urgently recommend external registrations, however, this is not mandatory.

### 10.2 Ethics

We are committed to combating corruption and conduct our business without engaging in corrupt practices, including bribing public or private functionaries or offering said persons kickback. When keeping our corporate documentation, we ensure integrity, transparency and accuracy.

Our principles for customer and supplier relations prohibit our employees from accepting money from suppliers and severely restrict the acceptance of promotional items, personal gifts and entertainment offers.

We undertake to properly handle competitor data, protected company information and other intellectual property. We act with integrity and in a lawful manner and comply with legal regulations on fair competition, professional and honest marketing as well as antitrust laws.

### 10.3 Communication and Implementation

Our business partners are responsible for communicating the content of the Code of Conduct to employees, contractual partners and third parties, if necessary. Contractual partners must be able to track and generally guarantee compliance with the Code of Conduct. However, sharing company and business secrets or information on competitive factors or information that is otherwise protected is excluded from this for legal reasons.

Business partners will observe this Code of Conduct in their own actions and will encourage their own business partners to apply the Code of Conduct correspondingly. Business partners support their own partners in shaping their supply chains in a manner that observes human and employee rights and ensures working conditions are continuously improved.

Any significant breach of the aforementioned obligations will be viewed as a breach of contract by the respective business partner. If possible, we provide business partners the opportunity to perform corresponding corrective measures.



Hendrik Schabsky  
CEO

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Date

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Signature

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Company Stamp