

Code of Conduct for Business Partners

In recent years, Buckton Scott Deutschland GmbH has developed into a leading international company in the retail sector.

Compliance with strict requirements, as well as responsible and fair business behaviour, are top priorities for our company and an integral part of our corporate values.

Our products inspire people, improve their quality of life and help to conserve natural resources. Sustainability in our actions is an important element of our self-image and our corporate strategy.

We are committed to compliance with internationally recognised human rights and social standards throughout our value chain.

Our business partners make a significant contribution towards our success. We consider a shared understanding of ethical and sustainable behaviour to be an essential basis for this. The requirements and principles of this "Code of Conduct for Business Partners" form an essential part of the collaboration between Buckton Scott Deutschland GmbH and our business partners.

The social and environmental standards and processes described here are based on the ten principles of the United Nations Global Compact, the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

These regulations implement the German Lieferkettensorgfaltspflichtengesetz (Supply Chain Due Diligence Act) and other comparable national regulations.

The requirements and principles contained in this Code of Conduct are an integral part of the contractual obligations and collaboration between our business partners and Buckton Scott Deutschland GmbH. Our business partners, therefore, shall comply with and promote the following principles of this Code of Conduct and provide their employees with regular and appropriate training in this regard. In addition, these contents also apply to suppliers and other third parties used by our business partners to fulfil contracts. The business partner must, therefore, integrate provisions corresponding to the contents of this Code of Conduct into its own contracts. We expect it to commit its suppliers and other third parties accordingly.

We are aware that legal and cultural requirements may differ in individual countries, business areas or markets. In the event that stricter regulations apply in individual countries, business areas or markets than those set out in this Code of Conduct, the stricter regulations shall apply.

This Code of Conduct applies to all business partners of Buckton Scott Deutschland GmbH. Business partners within the meaning of this Code of Conduct are all third parties who work for, on behalf of or together with Buckton Scott Deutschland GmbH. This includes, in particular, suppliers, subcontractors, consultants, brokers, agents, commercial representatives, contractors and freelancers.

As national and international regulations are developing rapidly, we reserve the right to adapt this Code of Conduct accordingly, in particular due to changes in the relevant laws and regulations. Buckton Scott Deutschland GmbH shall inform its business partner in an appropriate manner in the event of a change to the Code of Conduct.

Principle of legality

Buckton Scott Deutschland GmbH upholds the principle of strict legality in all of the actions, measures, contracts and other transactions of Buckton Scott Deutschland GmbH. Compliance with the principle of legality also includes the payment of taxes and customs duties owed, compliance with competition and antitrust law, the prohibition of corruption and money laundering, obtaining the official authorisations necessary, compliance with export control law and the observance of the legal rights of third parties. This also applies to the development and manufacture of products and the provision of services.

Accordingly, we expect our business partners to comply with the applicable laws, the basic principles of the United Nations Global Compact and this Code of Conduct as part of their business activities with Buckton Scott Deutschland GmbH and to work towards ensuring that this Code of Conduct is complied with by third parties who are engaged to fulfil contracts with us.

Dealings with employees

Our business partners comply with fundamental employees' rights on the basis of the applicable national legislation. The following principles are based on the fundamental principles of the International Labour Organization (ILO).

Human rights

Our business partners respect internationally recognised human rights and actively promote their observance. The United Nations Guiding Principles on Business and Human Rights form the basis for this.

Child labour

Our business partners only employ staff who have reached the minimum age required to carry out work in accordance with the applicable national legislation. They also respect and observe the rights of children. ILO Conventions No. 138 on the minimum age for employment and No. 182 on the elimination of the worst forms of child labour must be complied with.

Forced labour

Our business partners reject all forms of forced labour, including human trafficking, torture and any form of slavery or compulsory labour, and respect the principle of freely chosen employment.

Freedom of association

Our business partners respect the right to freedom of association and the right to form interest groups. They grant their employees the right to defend their interests on the basis of national legislation. The right to collective bargaining to regulate working conditions and the right to strike must be granted within the framework of legal regulations and in accordance with ILO Convention No. 98.

Equal opportunities

Our business partners do not tolerate discrimination against employees on the basis of skin colour, ethnic origin, gender, age, nationality, social background, disability, sexual orientation, religion or ideology. The same applies to any form of harassment. Where job requirements and tasks are comparable, the principle of equal pay for work of equal value must apply, regardless of gender. The ILO conventions must be complied with.

Fair working conditions

Our business partners shall guarantee the right to fair working conditions in accordance with the applicable ILO conventions. Our business partners pay remuneration and social benefits that as a minimum comply with national and local legal standards, regulations or agreements. The applicable regulations on working hours and holidays shall be observed.

Occupational health and safety

As a minimum, our business partners comply with the applicable national standards for a safe and hygienic working environment and take appropriate measures to ensure health and safety in the workplace in order to guarantee healthy working conditions. Our business partners also review the introduction and further development of an occupational health and safety management system (OH&S management system) analogous to ISO 45001 or an OH&S management system suitable for the industry in question and introduce measures in this context in order to implement the objectives of an OH&S management system in a suitable manner.

Protection from eviction and land confiscation

Our business partners shall not carry out any unlawful evictions. In addition, they shall not confiscate land, forests and waters illegally through acquisition, development or other use.

Use of private or public security forces

Our business partners shall refrain from commissioning or using private and public security forces if there is a risk of torture and cruel, inhuman or degrading treatment, injury to life or limb or impairment of the freedom of association and union organisation due to a lack of instruction or control on the part of the company when deploying security forces.

Environmental protection

Our business partners avoid risks to people and the environment, minimise their impact on the environment and use resources sparingly.

Our business partners' processes, facilities and equipment comply with the applicable legal requirements and standards for fire and environmental protection. Our business partners shall also introduce and further develop an environmental management system (EMS) analogous to ISO 14001 or an environmental management system that is suitable for the industry. Furthermore, business partners shall introduce measures to implement the objectives of ISO 14001 in an appropriate manner.

Climate protection

We expect our business partners to pursue sustainable and active climate protection, for example, by increasing energy efficiency or generating or purchasing energy from renewable sources.

Water consumption and quality

Our business partners are committed to using water carefully. In areas of water scarcity, in particular, water abstraction must be minimised and access to drinking water and sanitary facilities must be guaranteed. Waste water quality standards must be defined and monitored within the framework of and in accordance with applicable legal and regulatory requirements.

Air quality and soil quality

As a minimum, our business partners comply with the relevant legal requirements and the requirements of the local authorities.

Materials and disposal

We expect our business partners to minimise any impact from their business activities on the environment and to use resources sparingly. Wherever possible, materials shall be reused. When dealing with waste, our business partners follow the principle of "avoidance before disposal". Our business partners always comply at least with the relevant statutory regulations and official requirements.

Business relations

Avoidance of conflicts of interest

Our business partners make decisions on the basis of objective considerations and do not allow themselves to be unduly influenced by personal interests.

If our business partner becomes aware of a potential conflict of interest in connection with our company, it will inform Buckton Scott Deutschland GmbH immediately.

Free competition

Our business partners behave fairly in competition and comply with the applicable legal regulations that protect free competition.

Furthermore, they do not enter into any agreements or coordinated practices with other companies that have the purpose or effect of preventing, restricting or distorting competition in accordance with the applicable antitrust regulations and do not illegally exploit any dominant market position.

Corruption

Our business partners ensure compliance with the applicable anti-corruption laws. In particular, they shall ensure that their employees, subcontractors or representatives do not offer, promise or grant any advantages to employees of Buckton Scott Deutschland GmbH with the aim of obtaining an order or other preferential treatment in business dealings. These principles also apply if our business partners co-operate with other third parties in connection with their work for us.

Under no circumstances do our business partners tolerate payments or other favours to an individual, company or public official with the aim of influencing the decision-making processes of the beneficiary or a third party, regardless of whether this violates applicable laws and regulations. Our business partners only make contributions in connection with advertising measures, donations and sponsoring within the legally permissible and customary framework.

Similarly, our business partners never offer, grant, demand or accept illegal payments, such as bribes, facilitation payments and kickback payments, or other benefits for the realisation of business or in connection with the business relationship.

Trade secrets

When working with our customers and business partners, we often gain insights into confidential expertise, ideas, concepts and plans. The trust associated with this is an essential basis for the business of Buckton Scott Deutschland GmbH. The same applies to Buckton Scott Deutschland's own internal information, such as new product developments, business ideas or business documents. The confidential handling of information is, therefore, of key importance to us, which is why we also demand the same from our business partners.

Our business partners shall ensure that Buckton Scott's confidential information is kept secret and its intellectual property is protected. This also applies after the termination of the business relationship. Furthermore, our business partners comply with all of the applicable data protection laws and use third-party software (including open source software and firmware) only within the scope of the rights granted and in compliance with the relevant licence conditions.

Money laundering

Our business partners comply with the relevant statutory provisions on the prevention of money laundering.

Customs and export control regulations, sanctions

Our business partners comply with international customs and export control regulations and ensure the proactive exchange of information that is relevant to foreign trade with the aim of ensuring a secure supply chain.

Our business partners observe the regulations on sanctions and embargoes applicable to Buckton Scott and to the business partner, as well as regulations concerning the transport of goods, technologies, services and information and the fight against terrorist financing.

Data protection and data security

In all business processes, our business partners shall guarantee the right to informational self-determination, the protection of personal data and the security of all business information and personal data in compliance with legal requirements and the applicable data protection and information security laws.

IT security

Electronic data processing systems are indispensable. Tampering with or the malfunctioning of these systems can have serious consequences, such as data loss, theft of personal data or the infringement of copyrights. Buckton Scott Deutschland GmbH has, therefore, taken appropriate measures and issued rules to ensure the confidentiality, integrity and availability of electronically stored information. We also expect our business partners to take appropriate security measures to ensure the protection of information stored electronically. In particular, they shall take all necessary measures to prevent internal or external misuse and threats to sensitive information.

WHISTLEBLOWER PROCEDURE, COMPLAINTS PROCEDURE

Every business partner – including its employees or affected parties – is called upon to report possible suspected cases and violations of this Code of Conduct. This is intended to limit the consequences of such offences and prevent similar misconduct in the future.

Notifications can be submitted via the contact addresses listed in the appendix. Our business partners will inform your employees about this possibility to get in contact.

Where required by national regulations, our business partners set up their own whistle-blowing system or join an industry-wide system.

Financing of armed groups

Our business partners work to prevent the direct or indirect financing of armed groups. In this context, they observe the applicable legal requirements relating to "conflict raw materials" and comply with them accordingly.

Compliance with this Code of Conduct, audits

Our business partners shall communicate this Code of Conduct to third parties who are used to fulfil the contractual relationship with Buckton Scott Deutschland GmbH, take the Code of Conduct into account when selecting these third parties and work towards compliance with it.

We, Buckton Scott Deutschland GmbH, reserve the right to verify compliance with this Code of Conduct by our business partners in an appropriate manner. The scope, period and location of this audit shall be agreed with the business partner accordingly.

A breach of this Code of Conduct constitutes an impairment of the business relationship between us and the business partner. The business partner shall inform us within a reasonable period of time of the internal measures it has taken to prevent future violations. If the business partner does not fulfil these obligations within a reasonable period of time, if the business partner demonstrably fails to initiate suitable improvement measures within a reasonable period of time or if the breach is so serious that a continuation of the business relationship becomes unreasonable for us, Buckton Scott Deutschland GmbH reserves the right, without prejudice to further rights, to terminate the contractual relationship concerned without notice or to withdraw from the contract concerned.

We ask all of our business partners to work with us to ensure that we act with integrity, fairness and independence in our day-to-day business.

Signed by Christian Hanke
– **Board of Management** –
Buckton Scott Deutschland GmbH
Status: 10/02/2025

Compliance contact person

Christian Hanke
Christian.hanke@bucktonscott.de

Contact addresses for whistle-blower procedures and complaints procedures:

email: info@bucktonscott.de
Phone: 0531 618 382-0