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Amendment date: 31.01.2024 Status: 05	Code of Conduct on Social Responsibility	

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0. preamble

Meleghy International is the registered trademark of the Meleghy group of companies. The Meleghy International organization is committed to corporate social responsibility (internationally usually referred to as "CSR "1) as part of its business activities worldwide. This "Code of Conduct on Social Responsibility" sets out as a corporate guideline what this means in particular with regard to working conditions, social and environmental compatibility, information security as well as transparency, trusting cooperation and dialog. The contents of this Code of Conduct are an expression of our company's shared values.

1. basic understanding of socially responsible corporate governance

This Code of Conduct is based on a common basic understanding of socially responsible corporate governance. It includes the principles of business ethics, working conditions and human rights, occupational health and safety and the use of resources.

For Meleghy International, this means that it assumes responsibility by considering the consequences of its business decisions and actions in economic, technological, social and ecological terms and by achieving an appropriate balance of interests. Meleghy International voluntarily contributes to the well-being and sustainable development of global society at the locations where it operates within the scope of its respective possibilities and scope of action. In doing so, it is guided by universal ethical values and principles, in particular integrity and honesty and respect for human dignity. The safety of its employees is of fundamental importance.


2 Scope of application and obligation

2.1 Scope of application

This Code of Conduct applies to all subsidiaries and business units of the **Meleghy International** Organization worldwide.

2.2 Commitment

Meleghy International undertakes to comply with the contents of this Code of Conduct and also demands and promotes this from its suppliers in the further value chain within the scope of their respective possibilities and scope of action.

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3. cornerstones of socially responsible corporate governance

Meleghy International actively works to ensure that the values and principles set out below are observed and complied with in the long term.

3.1 Compliance with laws

Meleghy International complies with the applicable laws and other legal provisions of the countries in which it operates. Compliance with applicable regulations on export controls and economic sanctions is expressly required. In countries with a weak institutional framework, it carefully examines which good corporate practice from its own home country should be applied to support responsible corporate governance.

3.2 Integrity and Organizational Governance


3.2.1 **Meleghy International** bases its actions on universal ethical values and principles, in particular integrity, honesty, respect for human dignity, openness and non-discrimination of religion, ideology, gender and ethics, and respects the rights of minorities and indigenous peoples. Employees are recruited fairly and transparently in accordance with international labor standards.

3.2.2 **Meleghy International** rejects corruption and money laundering, extortion and bribery in accordance with the relevant UN Convention² and promotes transparency, acting with integrity and responsible management and control within the company in an appropriate manner.

3.2.3 **Meleghy International** pursues clean and recognized business practices and fair competition (antitrust law). In competition, it is guided by professional behavior and quality work. It maintains a cooperative and trusting relationship with the supervisory authorities. Personal activities that conflict with the duties at Meleghy International (conflicts of interest) must be reported to the management immediately.

3.2.4 **Meleghy International** is committed to avoiding forced evictions and the seizure of land, forests and waters when acquiring, developing or otherwise using land, forests and waters.

3.2.5 **Meleghy International** avoids the use of private and public security services for the protection of business projects if their use may lead to the violation of human rights due to a lack of training or control on the part of the company.

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3.3 Consumer interests

Where consumer interests are affected, **Meleghy International** complies with consumer protection regulations and appropriate sales, marketing and information practices. Particular attention is paid to vulnerable groups (e.g. protection of minors).

3.4 Communication and financial responsibility

Meleghy International communicates openly and in a dialog-oriented manner about the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other interest and stakeholder groups. All documents and records are prepared in accordance with our obligations, including financial responsibility, are not unfairly altered or destroyed and are stored appropriately. Trade secrets and business information of partners are treated sensitively and confidentially.

3.4.1 Information security


For **Meleghy International**, the proper handling of information and data and their security against misuse by itself and its partners and suppliers is of fundamental importance. Meleghy International has a regulation (ISMS policy) for this purpose. It describes the general principles and objectives of information security, the responsibilities and the information security organization. It regulates the holistic information security process and applies to all branches and companies of Meleghy International.

3.4.2 Protection of intellectual property and plagiarism

The protection of intellectual property is of key importance to **Meleghy International's** business policy. Intellectual property refers to intellectual creations such as inventions, literary and artistic works, designs and symbols, names and images used in commerce. These are legally protected, for example, by patents, copyrights and trademarks, which allow inventors to earn recognition or financial benefits from what they invent or create, as well as the creation of plagiarism of all kinds.

3.5 Human rights

Meleghy International is committed to the promotion of human rights. It respects human rights in accordance with the UN Charter of Human Rights³ and pays particular attention to compliance with the following.

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3.5.1 Privacy

Meleghy International protects and respects the privacy of every employee. Meleghy International will not subject anyone to arbitrary interference with his or her private life, family, home and correspondence, or to damage to his or her honor and reputation.

3.5.2 Occupational health and safety

Meleghy International will do everything necessary to ensure health and safety at work, in particular to ensure a safe and healthy working environment in order to avoid accidents and injuries.

3.5.3 Harassment

Meleghy International rejects any physical punishment and discrimination, including against the background of physical, sexual, psychological or verbal harassment or abuse, in order to protect its employees. The right of women and social minorities to political, economic and social equality is part of our basic understanding.

3.5.4 Freedom of expression

Meleghy International protects and guarantees the right to freedom of opinion and expression.

3.5.5 Inclusive culture

Meleghy International promotes an inclusive culture of diversity, equality and inclusion that enables every employee to contribute fully.

3.6 Working conditions

Meleghy International complies with the following core labor standards of the ILO⁴.

3.6.1 Child labor and young workers


Meleghy International respects the prohibition of child labor, i.e. the employment of persons in accordance with the legislation of the respective country.⁵

3.6.2 Forced labor and human trafficking

Meleghy International rejects modern slavery, human trafficking and forced labor of any kind.⁶

3.6.3 Wages and social benefits

Meleghy International complies with the applicable laws and regulations on labor standards with regard to remuneration, wages and social benefits of the respective country.⁷

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3.6.4 Employee rights

Meleghy International respects the right of employees to freedom of association, freedom of assembly and collective bargaining, insofar as this is legally permissible and possible in the respective country.⁸

3.6.5 Prohibition of discrimination

Meleghy International is committed to the non-discriminatory treatment of all employees.⁹

3.7 Working hours

Meleghy International complies with the labor standards regarding the maximum permissible working hours of the respective country.

3.8 Environmental protection

Meleghy International complies with the environmental protection regulations and standards that apply to its respective operations and acts in an environmentally conscious manner at all locations.

Meleghy International has and maintains an environmental management system in accordance with the DIN EN ISO 14001 standard.


It handles natural resources responsibly in accordance with the principles of the Rio Declaration¹⁰.

This applies in particular to

- climate protection
- Animal welfare, biodiversity, land use and deforestation
- Reporting on the reduction of greenhouse gas emissions (GHG) and decarbonization
- Air quality, soil quality and the reduction of noise emissions
- Sustainable management of natural resources and waste prevention,
- Support for reuse and recycling
- Water quality and reduction of water consumption
- Responsible chemicals management.

and compliance with the following legal interests¹¹:

- **Minamata Convention** on the Prohibition of the Production, Use and Treatment of Mercury and Mercury Compounds
- **Stockholm Convention** on the Prohibition of the Production and Use of Persistent Organic Pollutants and on the Prohibition of Non-Environmentally Sound Handling, Collection, Storage and Disposal
- **Basel Convention** on the Prohibition of the Export of Hazardous Waste, Transboundary Movements of Hazardous Waste and their Disposal

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3.9 Energy management

Meleghy International pays attention to the careful use of energy and works continuously to improve energy efficiency and increase the use of renewable energies.

Meleghy International has an energy management system in accordance with the ISO 50001 standards. The energy management system applies to all sites and branches.

3.10 Civic engagement

Meleghy International contributes to the social and economic development of the country and region in which it operates and welcomes corresponding voluntary activities by its employees.


4 Implementation and enforcement

Meleghy International will make all appropriate and reasonable efforts to continuously implement and apply the principles and values described in this Code of Conduct. Contractual partners shall be informed of the essential measures upon request and within the framework of reciprocity, so that it becomes comprehensible how compliance with them is fundamentally ensured. There is no entitlement to the disclosure of trade and business secrets, information relating to competition or other information worthy of protection.

5 Reporting violations

Violations of the principles of this Code of Conduct can be reported in accordance with the Whistle Blowing Policy without fear of retaliation of any kind. External parties can make contact via the Meleghy International homepage (e.g. via the Purchasing department).

- 1 CSR = Corporate Social Responsibility
- 2 United Nations Convention against Corruption of 2003, in force since 2005
- 3 Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948
- 4 ILO = International Labor Organization
- 5 ILO Convention No. 138 of 1973 and ILO Convention No. 182 of 1999
- 6 ILO Convention No. 29 of 1930 and ILO Convention No. 105 of 1957
- 7 ILO Convention No. 100 of 1951
- 8 ILO Convention No. 87 of 1948 and ILO Convention No. 98 of 1949
- 9 ILO Convention No. 111 of 1958
- 10 The 27 principles of the "Rio Declaration on Environment and Development" of 1992 as a result of the United Nations Conference on Environment and Development in Rio de Janeiro.
- 11 Supply Chain Due Diligence Act (LkSG) §2

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Only for supplier confirmation

Due diligence in the supply chain:

The supplier has to fulfil the legal requirements for human rights and environmental due diligence obligations of companies applicable in Germany at all times and provide us with all necessary information and enable inspections within a reasonable period of time upon request.

The supplier must tolerate measures that we take to fulfil the legal requirements for human rights and environmental due diligence obligations of companies - insofar as this is not unreasonable - and support us in doing so.

By signing, the supplier confirms compliance with this Code of Conduct in its company or refers to its own Code of Conduct and obliges its own suppliers to follow similar procedures along the supply chain.

Name of the company: _____

Place, date

Signature / Stamp

- Own Code of Conduct available
Attachment (please attach document)