



POOLgroup GmbH  
Südring 26  
48282 Emsdetten

# Code of Conduct

(Standards and behavior for contractors)

Version (V1.11) of 27/09/2022



# Code of Conduct

(Standards and behavior for contractors)

POOLgroup GmbH

Südring 26  
48282 Emsdetten  
[www.pool.de](http://www.pool.de)

This Code of Conduct outlines POOLgroup GmbH's (hereinafter POOLgroup) principles and expectations for its contractors, emphasizing their responsibility toward society and the environment.

If possible, please do not print this document.

If this is not possible, please consider the following options to conserve resources:

- Only print the relevant individual pages
- Shrink multiple pages onto one
- Avoid printing in color
- Use the draft, eco, or toner-saving mode of your printer
- Print on both sides of the paper (duplex)

*Please note:*

*When creating the Code of Conduct, attention was paid to the use of gender-neutral wording.*



The contractor undertakes to comply with the following principles:

#### Compliance with legal requirements

- To comply with the laws, regulations and other requirements of the applicable legal system(s), in particular regarding the transparency of business activities, data protection, and product safety.

#### Management systems

- To establish, document, and continuously improve appropriate management processes to identify and, where appropriate, mitigate or correct negative social, environmental, or health and safety impacts on workers, the environment, and communities and in addition, to assume financial responsibility;
- To establish an effective complaints procedure to ensure that each employee, individually or together with other employees, can file a complaint without suffering prejudice, disadvantage or retribution of any kind.

#### Fair competition – ban on corruption and bribery

- To comply with antitrust regulations, disclose conflicts of interest, and compete fairly;
- To respect intellectual property and trademark rights;
- To abide by economic sanctions and export controls;
- To not tolerate any form of corruption, bribery, or other undue influence, whether by employees, external third parties, or agents, or in any way engage in it, including any illegal offers of payments or similar benefits to government officials.

#### Respect the fundamental rights of all internal and external employees

- To comply with ILO core labor standards and implement ILO basic principles, in particular not employing anyone under the age of 15; in countries covered by the ILO Convention 138, not employing anyone under the age of 14 as well as ensuring the health and safety of young employees, including prohibiting them from dangerous work and night shifts;
- Not to engage in or tolerate any form of modern slavery, forced labor and human trafficking;
- To ensure that no internal or external employee is exposed to unethical recruitment practices;
- To promote equal opportunities and treatment for its employees regardless of their ethnicity, nationality, social background, disability, sexual orientation, political or religious beliefs, gender, or age;
- To respect the dignity, privacy, and rights of each individual and create a family-friendly environment;
- Not to tolerate unacceptable treatment of workers, such as psychological hardship, sexual harassment, or individual discrimination;
- Not to tolerate behavior (including gestures, language, and physical contact) that is sexually coercive, threatening, abusive, or exploitative;
- To ensure adequate remuneration and social security cover and to pay at least the national minimum wage laid down by law;
- To comply with the maximum working time directives prescribed by law in each jurisdiction;
- To the extent legally permissible, recognize employees' rights to freedom of association and collective bargaining and neither favor nor discriminate against members of any workers' organizations or trade unions.

#### Health and safety of internal and external employees

- To take responsibility for internal and external employees' health and safety;
- To reduce risks and adopt the most appropriate safeguards to prevent accidents and work-related diseases;
- To provide training and ensure that all internal and external employees are proficient in workplace health and safety.

#### Environmental protection and sustainability

- To protect the environment in accordance with legal and international standards, including handling chemicals and other hazardous materials responsibly;
- To use resources effectively and efficiently (in particular materials, energy, and water);
- To minimize any environmental impact (in particular waste, sewage, air and noise pollution);
- To continuously improve environmental protection.

#### Supply chain

- To make reasonable efforts to identify the social and environmental risks in their own supply chain and to ensure that their contractors and suppliers comply with the requirements set out here to a comparable standard.