

Code of Conduct for Suppliers of the Rheinische Post Mediengruppe

1. Goal and motivation

The Rheinische Post Mediengruppe wants to convince with the quality and value of its products and services as well as through successful and sustainable business activities. We not only set high standards internally, but also work along our entire value chain to ensure compliance with these standards and thus also actively demand compliance from our suppliers (hereinafter also referred to as "business partners"). Furthermore, we expect them to comply with the applicable laws.

The following requirements specify the expectations of Rheinische Post Mediengruppe with regard to the attitude and conduct of business partners and form the basis for a successful and responsible business relationship.

2. Requirements

2.1 Ecological standards and environmental protection

Rheinische Post Mediengruppe is committed to continuously improving the environmental compatibility of its products and services and to reducing the use of natural resources while taking economic considerations into account.

Our business partners ensure that they comply with all applicable environmental laws and regulations. This applies in particular to compliance with the requirements of the international conventions of Minamata (mercury), Stockholm (persistent organic pollutants) and Basel (hazardous waste). Furthermore, Rheinische Post Mediengruppe expects its business partners to consider and comply with the following aspects:

Actively deal with environmental challenges; avoid environmental and health damage

Environmental impacts of products and services, in particular by causing harmful soil changes, water pollution, air pollution, harmful noise emissions or by excessive water consumption shall be continuously and sustainably reduced or even completely avoided. To this end, proactive management of the most important environmental indicators shall be provided for, which are suitable for avoiding or minimising impacts on the environment and the health of employees or third parties in all activities throughout the entire life cycle of the products and services.

Products and processes with low resource consumption

The economical use of energy, water and raw materials, the use of renewable resources and the minimisation of environmental and health damage are taken into account in the development, raw material extraction, production and use of products through to recycling, as well as in other activities. For newsprint in particular, only virgin fibres from renewable and certified tree stands or recycled waste paper are used.

Minimisation of substances hazardous to the environment and health

The use of substances and materials that are hazardous to the environment and health should be avoided as far as possible. This requires the identification of environmentally friendly alternatives and the implementation of solutions. Our business partners undertake to register the substances in accordance with the legal requirements of the respective markets, to declare them and, if necessary, to have them approved.

2.2 Social standards; human rights and labour rights of employees

For Rheinische Post Mediengruppe, respect for internationally recognised human rights is the basis of all business relationships. Our business partners undertake to respect the rights of their employees and others affected by the company's actions and to protect them in accordance with the guidelines of the international community.

No slavery and no human trafficking

Our business partners reject all forms of slavery, forced and compulsory labour and human trafficking. Employment relationships are based on voluntariness and can be terminated by employees at their own will subject to a reasonable period of notice.

No child labour and protection of young employees

The minimum age for employment is observed in accordance with state regulations. In the absence of government regulations, the regulations of the International Labour Organisation (ILO) apply. Our business partners must ensure that young employees under the age of 18 do not work overtime or night work and are protected against working conditions that are detrimental to their health, safety, morale or development.

Reasonable wage

Our business partners pay their employees an appropriate wage. This must be at least equal to the minimum wage set under the applicable law and must provide employees and their families with a decent living.

Working hours

Our business partners ensure that working hours comply with applicable laws or industry standards and that measures are taken to prevent excessive physical or mental fatigue.

No discrimination or harassment

Employees are not discriminated against, e.g. on the grounds of ethnic origin, skin colour, gender, religion, nationality, sexual orientation, social origin, age, physical or mental limitations, marital status, pregnancy, membership of a trade union or political views, provided these are based on democratic principles and tolerance towards those with different opinions. Thus, as a matter of principle, employees are selected, hired and promoted on the basis of their qualifications and skills.

Our business partners are committed to a working environment that is free from harassment. They shall promote a social environment with respect for the individual. Business partners shall ensure that employees are not subject to inhumane physical or psychological treatment, corporal punishment or threats.

Ensuring occupational safety and health protection

Our business partners must comply with applicable laws on the implementation of occupational health and safety measures to improve occupational safety and health. They establish standards and take measures that enable a continuous reduction of work-related health hazards.

Freedom of association and right to collective bargaining

Our business partners shall ensure that their employees are free to form or join trade unions. Business partners avoid any kind of discrimination or retaliation due to trade union activities of their employees. They recognise the right to collective bargaining and the right of trade unions to operate freely, including the right to strike and the right to collective bargaining.

Protecting local communities

Our business partners respect the rights of local communities and consider the impact of their business activities on them.

Deployment of security forces

Our business partners only use security personnel who are appropriately trained, effectively monitored and contractually obliged to respect human rights, as well as regularly trained in this regard.

2.3 Ethical standards; business relations and market conduct

Commissioning of business partners

Our business partners work towards maintaining business relationships only with those business partners whose conduct – compliant with the rules and regulations – they have satisfied themselves of through appropriate measures. Furthermore, they take appropriate measures to prevent identified violations.

Ban on corruption

Our business partners must not tolerate corruption under any circumstances and must work against all forms of corruption, whether in the public or private sector. It is forbidden to offer, demand, hand over, accept and receive bribes and other improper advantages - both directly and indirectly, for business or private benefit, for oneself or others.

Free competition

Our business partners comply with the applicable competition and antitrust laws. They shall ensure that neither an exchange of competitively sensitive information nor any other conduct that may inadmissibly restrict or limit competition takes place.

Import and export controls, sanctions lists

Our business partners strictly observe the applicable laws for the import and export of goods, services and information. They also observe the sanctions lists of the EU and the United Kingdom.

Protection of confidential data and information

Our business partners comply with all applicable laws and regulations on data protection and data security. They must take the necessary measures to adequately protect personal data. This includes data of employees, customers and business partners.

Our business partners ensure security of information. They take the necessary measures according to the current state of technology to protect confidential information from unauthorised access by third parties and only use it for the agreed purposes.

3. Integration of sustainability requirements into the entire supply chain

Implementation of due diligence and documentation

Our business partners are required to fulfil their due diligence obligations as defined by the Supply Chain Act and to integrate these obligations into their daily business through a structured and informed approach.

In addition, they shall take appropriate steps to ensure compliance with the requirements by their business partners along the supply chain and ensure compliance with the requirements by training their employees. This further includes that suppliers continuously work on transparency in the upstream supply chain up to the extraction of raw materials, identify grievances in the sense of the above due diligence as integral parts of the requirements and take appropriate measures to mitigate them.

Our business partners document the due diligence process in their own supply chains and make this documentation and all information relevant to compliance with this Supplier Code available upon request.

Any identified non-compliance with sustainability requirements in a business partner's supply chain shall be assessed by the business partner within a reasonable period of time and remedied on its own responsibility.

Sustainability strategy

Rheinische Post Mediengruppe recommends that business partners publish their strategy for dealing with social, ethical and environmental issues and standards.

Verification of compliance with the requirements

Rheinische Post Mediengruppe reserves the right to verify compliance with the requirements by appropriate means, including on site by its own employees or qualified third parties.

Reporting office for misconduct

In order to identify possible misconduct at an early stage and to be able to take action, we rely on information about potential violations. Therefore, we expect our business partners to encourage their employees to report information about violations of this Supplier Code or other laws related to our business activities without fear of reprisal.

Business partners, their employees, as well as employees in the supply chain and other third parties can submit notices to our Compliance Ombudsman through the channels below:

- Dr Johannes Dilling, lawyer, Landgrafenstr. 49, 50931 Cologne, Germany
- Phone: 0221/933 107 40
- E-mail: info@ra-dilling.de
- Portal for references: <https://www.safewhistle.info>

All information will be treated confidentially.

Furthermore, we expect our business partners to establish their own equivalent whistleblowing channels. They should treat received tips confidentially as far as legally possible, investigate them and take the necessary measures, as required.

4. Legal consequences in the event of infringements

Rheinische Post Mediengruppe considers compliance with the requirements formulated in this Code of Conduct to be essential for the respective business relationship.

In the event of non-compliance, Rheinische Post Mediengruppe reserves the right to take appropriate steps and a special right of termination.

We hereby undertake to comply with the above principles.

Full name of the company: _____

Name: _____

Position: _____

Company address: _____

Place/ Date: _____ Signature: _____