



# KLOCKE GRUPPE

## CODE OF CONDUCT

KLOCKE Verpackungs-Service GmbH (KVS) and KLOCKE Pharma-Service GmbH (KPS) (in the following KLOCKE Gruppe) manufactures and packages pharmaceuticals, veterinary medicines, food supplements, cosmetic products, foods and technical products.

This results in a high level of responsibility not only towards customers, patients, healthcare professionals and all other people who use our products and services. As a result of that, we have a high responsibility not only towards customers, patients and people working in healing professions and others, requiring our products and services, but also a high level of responsibility:

- ✓ towards our employees, suppliers and service providers
- ✓ with regard to fair and honest interaction with our business partners
- ✓ towards our environment



## A. RESPONSIBILITY FOR OUR EMPLOYEES

We reject any involvement in, acceptance of and tolerance of slavery and human trafficking in direct or indirect connection with our services and business activities.

This declaration has been established in accordance with the ETI-base Code<sup>1</sup> and article 54, (6) of the Modern Slavery Act 2015 and describes the measures we have taken to prevent slavery, human trafficking and inhuman working conditions in our supply chains and business operations.

The provisions of this Code specify minimum standards. We expect companies that follow this code to comply with national and other applicable laws. Where provisions of legislation and this Code address the same issues, the regulation that provides the greater protection to the employee must always be applied.

### 1. EMPLOYMENT IS FREELY CHOSEN

- 1.1 There is no forced labor, indentured servitude or involuntary prison labor. We are committed to ensuring that no slavery or human trafficking takes place in any of our supply chains or business operations.
- 1.2 Employees are not required to leave a „deposit“ or their identity documents with their employer and are free to leave their employer after reasonable notice.

### 2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

- 2.1 Employees have the right, without exception, to assemble and form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer shall adopt an open attitude towards the activities of trade unions and their organizational activities.
- 2.3 Employee representatives are not discriminated against and have the opportunity to carry out their representative functions in the workplace.
- 2.4 Where the right to organize and bargain collectively is restricted by law, the employer shall facilitate and not hinder the development of equal means for independent and free association and bargaining.

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<sup>1</sup> Ethical Trade Initiative: Organization founded in the UK in 1998, which fights for the global protection of labor rights. More detailed information: [www.ethicaltrade.org](http://www.ethicaltrade.org)

### 3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

- 3.1** A safe and hygienic working environment must be provided, considering the general knowledge of the industry and certain hazards, in order to prevent accidents and damage to health. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by reduction so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2** Employees should receive regular and recorded health and safety training. This training should be repeated for new or rehired employees.
- 3.3** Access to clean toilet facilities and to potable water and, where appropriate, food storage facilities shall be provided.
- 3.4** Accommodation, if provided, must be clean and safe and meet the basic needs of the employees.
- 3.5** The complying company shall assign responsibility for health and safety to a senior management representative.

### 4. CHILD LABOR SHALL NOT BE USED

- 4.1** There shall be no employment of child labor.
- 4.2** Companies shall develop or participate in policies and programs that provide for the transfer of any child found performing child labor to quality education and for the child to remain in such education until the end of childhood.
- 4.3** Children and adolescents under the age of 18 shall not be employed during the night or in hazardous conditions.
- 4.4** These policies and procedures shall be consistent to the provisions of the relevant ILO<sup>2</sup> standards.

### 5. MINIMUM WAGES ARE PAID

- 5.1** Wages and allowances paid for a regular working week shall at least comply with national legal requirements or the industry standard, whichever is higher. In any case, wages should always be sufficient to cover basic needs and provide some discretionary income.
- 5.2** All employees shall receive written and understandable information about their employment conditions in relation to wages before they start work and at each payment on wage details for the relevant reference period.
- 5.3** Deductions from wages as disciplinary measures will not be permitted, nor will deductions be made from wages that are not permitted by national legislation without the express consent of the worker concerned. All disciplinary measures shall be recorded.

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<sup>2</sup> Standards of International Labor Organization (ILO)

## 6. WORKING HOURS ARE NOT EXCESSIVE

- 6.1 Working hours shall comply with national legislation and industry standard.
- 6.2 Working hours, excluding overtime, are defined and regulated by (collective) agreements. We also refer to the site-specific, valid company agreements regulating working hours.

## 7. DISCRIMINATION WILL NOT BE TOLERATED

- 7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

## 8. REGULAR EMPLOYMENT IS PROVIDED

- 8.1 The work performed is carried out as far as possible on the basis of the recognized employment relationship established by national legislation and practice.
- 8.2 Obligations to employees arising from labor or social security law and regulations regarding a regular employment relationship shall not be avoided through the use of labor-only contracts, subcontracting or homeworking, or through training plans without the intention of imparting skills or providing a regular employment relationship, nor shall such obligations be avoided through the excessive use of fixed-term employment contracts.
- 8.3 Leased employees are only hired through reputable leasing companies. These companies are obliged to ensure that employees are free to choose their employment relationship, are paid appropriately and comply with the other provisions of this Code of Conduct.

## 9. INHUMANE OR BRUTAL TREATMENT IS NOT PERMITTED

- 9.1 Physical abuse or discipline, threats of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

## **B. FAIRNESS AND INTEGRITY TOWARDS OUR BUSINESS PARTNERS**

### **1. BUSINESS PARTNERS, AUTHORITIES AND CONSUMERS**

The company operates in accordance with generally accepted business practices of fairness and honesty. It maintains a trusting relationship with the authorities. Consumer protection standards are respected.

### **2. BUSINESS SECRETS**

Business secrets of business partners are treated confidentially by KLOCKE Pharma-Service GmbH and KLOCKE Verpackungs-Service GmbH and their employees. Disclosure of confidential information to third parties or making it publicly available is prohibited. This also applies to company employees after termination of the employment relationship.

### **3. COMPETITION LAW**

The company is committed to fair competition. Competition-protecting laws, in particular antitrust law and other competition-regulating laws, are respected. Unlawful agreements on prices or other conditions, sales territories or customers as well as the abuse of market power contradict the principles of our company.

### **4. BRIBERY AND CORRUPTION**

The company rejects bribery and corruption and does not tolerate such behavior. Employees must ensure that no personal dependencies or obligations to customers or suppliers arise. In particular, company employees may not accept or give any gifts that could reasonably be expected to influence business decisions.

If gifts are customary and polite in a country, it must be ensured that no binding dependencies are created and that the national legal standards are observed.

Violations are generally punished with measures under labor law.

Employees are required to note that business relationships or transactions with related parties / companies must be reported to and approved by management in advance. This applies regardless of the value of the business relationship or transaction.

## C. ENVIRONMENT PROTECTION

The company is committed to the goals of sustainable environmental protection. Environmentally friendly production methods are pursued in this context. In accordance with the principles of the Rio Declaration of the United Nations<sup>3</sup>, the company uses natural resources responsibly.

## D. WHISTLEBLOWING

Violations of the contents of this Code of Conduct must be reported via the anonymous whistleblower system „whizzla“.

The whistleblower system can be accessed by all employees and third parties via the KLOCKE Gruppe website using the link  
<https://www.klocke.com/hinweisgebersystem/>



<sup>3</sup> 27 Principles of Rio-Declaration on Environment and Development, resolved by United Nations Conference on Environment and Development (UNCED), Rio de Janeiro, 1992.