



# CODE OF CONDUCT of the Brand Group

Statement of principles



# Content

## INTRODUCTION

|          |   |
|----------|---|
| Foreword | 3 |
|----------|---|

## DECLARATION

|                                                  |    |
|--------------------------------------------------|----|
| Respect for human rights                         | 4  |
| We respect our environment                       | 5  |
| We stand for honesty, integrity and transparency | 7  |
| Support for fair competition                     | 8  |
| Commitment to the objectives of export control   | 9  |
| Promoting togetherness                           | 10 |

“The Brand Group bears responsibility  
- for people, for the environment and for a sustainable  
future. This principle guides our daily actions.”



Dr. Constantin Schöler, Dr. Christoph Schöler

## Code of Conduct

The Brand Group, with product brands BRAND, VACUUBRAND, and VITLAB, serves life science, pharmaceutical, chemical, process analytics, and renewable energy laboratories globally. With a global team of approx. 1,000 employees worldwide, we develop, produce, and distribute high-quality laboratory equipment, consumables, and vacuum pumps and systems. Our headquarters are in Wertheim, Germany, with additional regional offices in Frankfurt am Main, Großostheim, Essex (Connecticut), Shanghai, Beijing, Huzhou, Mumbai, Bangalore, London, and Schiltigheim (Strasbourg).

As a medium-sized family-owned company, we are committed to respecting fundamental human rights, promoting ethical business practices and supporting sustainable development. Our commitment to these principles is not just a question of legal compliance, but is an essential part of our values and beliefs. For this reason, we are also a member of the UN Global Compact.

With this Code of Conduct, we emphasize our commitment to:

- + respect for human rights;
- + the protection of the environment and the responsible use of natural resources
- + honesty, integrity and transparency in our business transactions;
- + the promotion of fair competition;
- + compliance with export control objectives;
- + the encouragement of cooperation.

This Code of Conduct is binding for all Brand Group companies at all locations and for all business divisions. We are not only committed to complying with and promoting these principles ourselves, but also expect our business partners to do the same (see Supplier Code of Conduct).

We are convinced of the positive effects of adhering to and promoting these principles, which extend far beyond the boundaries of our company. Together, we can contribute to a fairer, more sustainable world for current and future generations.

Dr. Christoph Schöler  
Chairman of the Administrative Board  
Executive Director

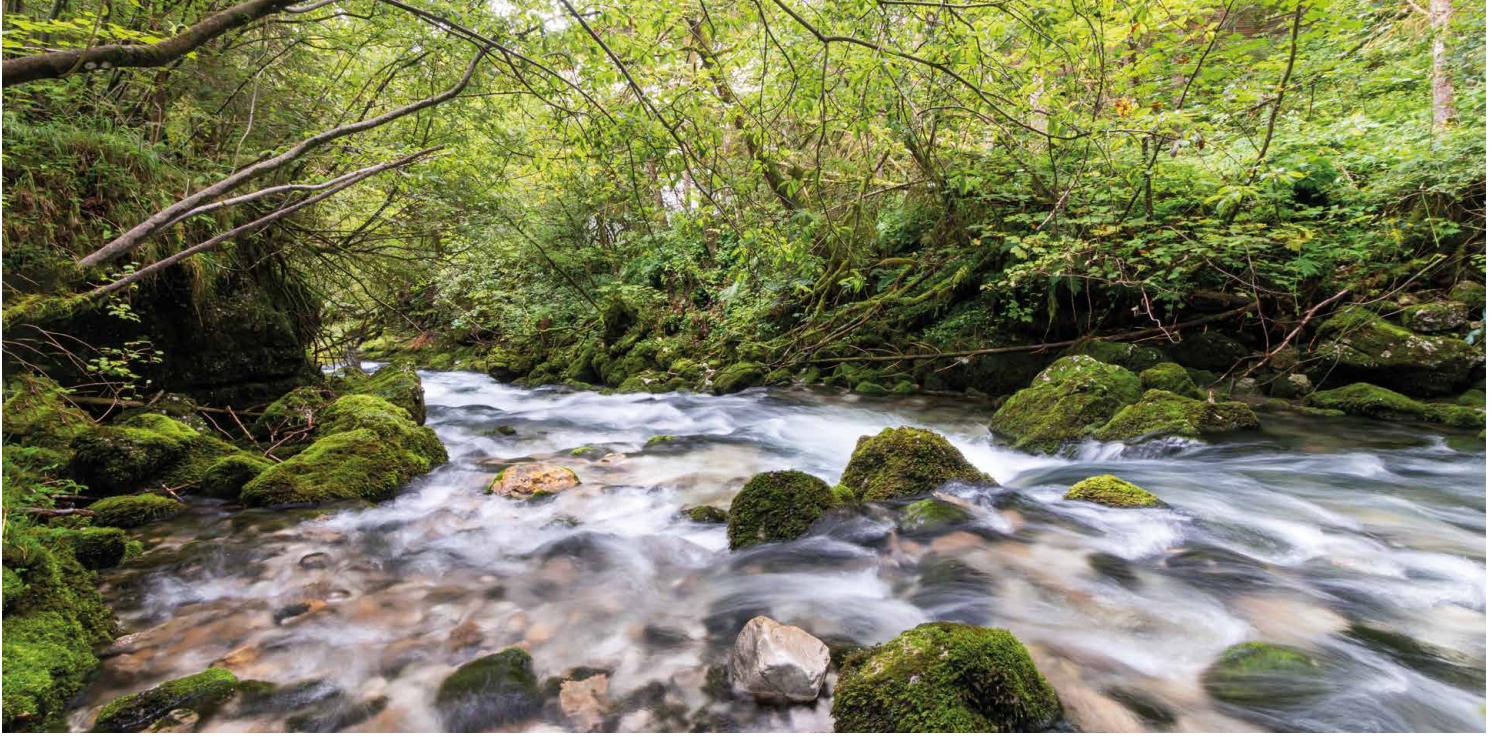
Dr. Constantin Schöler  
Executive Director



## Respect for human rights

- + We support compliance with the UN Human Rights Charter and the core labor standards of the International Labor Organization (ILO)<sup>1</sup> and strictly ensure that our business activities do not contribute to human rights violations. As a member of the UN Global Compact, we recognize the ten principles for responsible conduct in the areas of human rights, labor standards, environmental protection and anti-corruption.
- + We do not tolerate child labor. As a matter of principle, no persons under the respective legal minimum age for employees are employed. An employment age of less than 15 years is not permitted, unless exceptions apply in accordance with the provisions of the International Labor Organization (in particular Article 6 of Convention No. 138).
- + We condemn all forms of forced labor, slavery or any other form of domination or oppression through exploitation and humiliation in the work environment.
- + We do not tolerate any discrimination or harassment in the workplace and the personal dignity and privacy of all employees are respected without reservation.
- + We promote equal opportunities and equal treatment, regardless of origin, gender, political beliefs, religion and ideology, health status, disability, age, sexual orientation or identity.
- + We ensure that our employees receive fair and appropriate remuneration that never falls below the statutory national minimum wage. We adhere to the national legal regulations on working hours and ensure that work breaks are taken and paid leave is guaranteed.
- + We take responsibility for the health and safety of our employees in the working environment and workplace design. Targeted precautionary measures are taken to limit risks and prevent accidents and the occurrence of occupational illnesses. An appropriate occupational safety management system, which includes regular training in occupational safety, is maintained and promoted.
- + The freedom of association of employees is recognized without restriction and members of labor organizations or trade unions are neither favored nor disadvantaged.
- + We reject any use of violence, torture, humiliation and the denial of freedom of association and unionization by private or state security forces to protect our business activities.

<sup>1</sup> Convention No. 138 of 26.06.1973 concerning the minimum age for admission to employment;  
 Convention No. 182 of 17.06.1999 concerning the prohibition and immediate action for the elimination of the worst forms of child labor;  
 Convention No. 29 of 28.06.1930 concerning forced or compulsory labor; Protocol of 11.06.2014 to Convention No. 29 concerning forced or compulsory labor;  
 Convention No. 105 of 25.06.1957 concerning the abolition of forced labor;  
 Convention No. 100 of 29.06.1951 concerning equal remuneration for male and female workers;  
 Convention No. 111 of 25.06.1958 concerning discrimination in respect of employment and occupation;  
 Convention No. 87 of 09.07.1948, as amended on 26.06.1961, concerning freedom of association and protection of the right to organize;  
 Convention No. 98 of 01.07.1949, as amended on 26.06.1961, concerning the application of the principles of the right to organize and to bargain collectively;  
 International Covenant of 19.12.1966 on Civil and Political Rights; International Covenant of 19.12.1966 on Economic, Social and Cultural Rights



## We respect our environment

Our entrepreneurial activities are based on the principles of sustainable, future-proof and future-oriented product development, including the recycling economy, with the aim of ensuring that future generations also have the opportunity to develop and flourish freely.

We are continuously working to improve our environmental footprint by reducing greenhouse gas emissions, energy and water consumption and waste volumes.

We are aware that the handling and processing of certain substances, such as persistent organic pollutants and waste, can have a negative impact on human health. We comply with the international conventions on the reduction of negative environmental impacts, including the United Nations Minamata Convention and its implementation through European legislation, the Stockholm Convention on Persistent Organic Pollutants (POPs) and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes.

We reject any violence and human rights violations in connection with the extraction of certain minerals in conflict regions.

We believe in the importance of transparent supply chains and support the goals of the Responsible Minerals Initiative (RMI). We therefore expect our suppliers to procure their raw materials exclusively from responsible sources and to promote compliance with the requirements of Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act (the Dodd-Frank Act) and Regulation (EU) 2017/821 on due diligence along their supply chains. It is our goal that all tin, tantalum, tungsten or gold that we use is extracted exclusively in the following mining areas:

- + Mines and smelters outside a conflict region or
- + Mines and smelters that have been classified as conflict-free by an independent third party if they are located within a conflict region.

Our production sites in Germany are certified to ISO 14001 for environmental management, and BRAND GMBH + CO KG is also certified to ISO 50001 for energy management.

# Implementation of our duty of care

## Risk management

We see it as part of our corporate duty of care to identify potential and actual human rights risks and impacts along our value chain. We identify and manage these risks at an early stage through regular supplier assessments. In addition, we work with our suppliers and business partners to promote compliance with the guidelines and standards described above and set out in our Supplier Code of Conduct. Through our general purchasing conditions, the due diligence obligations along the supply chain become part of our agreements with our suppliers and must be observed by them. We regularly exchange information on current topics relating to due diligence in supply chains as part of cross-industry initiatives in a competition-compliant manner.

## Remedial measures

Despite our efforts, we cannot completely rule out the possibility of potential or actual human rights violations occurring within our business area or within the value chain. In such cases, we work towards eliminating them immediately and appropriately. We carefully and consistently investigate any reasonable suspicion or concrete indication of a possible human rights violation in the Brand Group or along our value chain. We encourage our business partners to support us in investigating suspected cases and to cooperate fully. Depending on the severity of the violation and within the scope of our influence, we reserve the right to take appropriate measures, from requesting remedial action to terminating the business relationship.

## Complaints procedure

Appropriate and effective complaint management is an important part of our due diligence processes to effectively prevent and remedy potential adverse human rights impacts caused by our business activities. Our complaints management system, which includes an ombudsman, allows potential violations of human rights or environmental concerns to be reported confidentially and, if necessary, anonymously at any time. All reports are dealt with in a documented, transparent and fair process and appropriate measures are taken if necessary.

## Reporting

As part of our annual sustainability report in accordance with the Corporate Sustainability Reporting Directive (CSRD), we inform the public about our ESG performance in the areas of sustainability, human rights and due diligence processes. We encourage open dialogue and feedback from stakeholders, including employees, business partners and civil society organizations, to ensure accountability and transparency. In addition to the report, we have our sustainability performance audited annually by an independent private company. The rating determined in this context assesses the impact of the environment, labor and human rights, ethics and sustainable procurement of the Brand Group's operating companies.

## Responsibility

The Brand Group's Executive Board is responsible for exercising and complying with our human rights' due diligence obligations. Regular and ad hoc internal reporting to the Brand Group's Executive Board on the results of our continuous risk analysis relevant to human rights, information from our complaints management and information on our remedial and preventive measures ensures that decisions can always be made on the basis of up-to-date and complete information. The responsible executives are responsible for the operational implementation of our human rights due diligence obligations in the areas of purchasing, sales and human resources.

## Accountability

We regularly review and update this declaration to take account of changes in our business processes, legal requirements and social expectations.



## We stand for honesty, integrity and transparency

We do not tolerate any form of corruption or bribery that manifests itself in the offering, giving, promising or accepting of benefits of any kind, not just cash payments and non-cash benefits. This also applies to any unlawful offers of payment or similar benefits to government officials and other decision-makers in order to influence their decision-making. To minimize risk, we provide particularly exposed employees with special anti-corruption training. In addition, our guideline on the prevention of corruption contains behavioral instructions for our employees. In the event of a breach of our principles and obligations, there is an obligation to report this so that we can clarify possible breaches without exception and introduce further measures to prevent them.

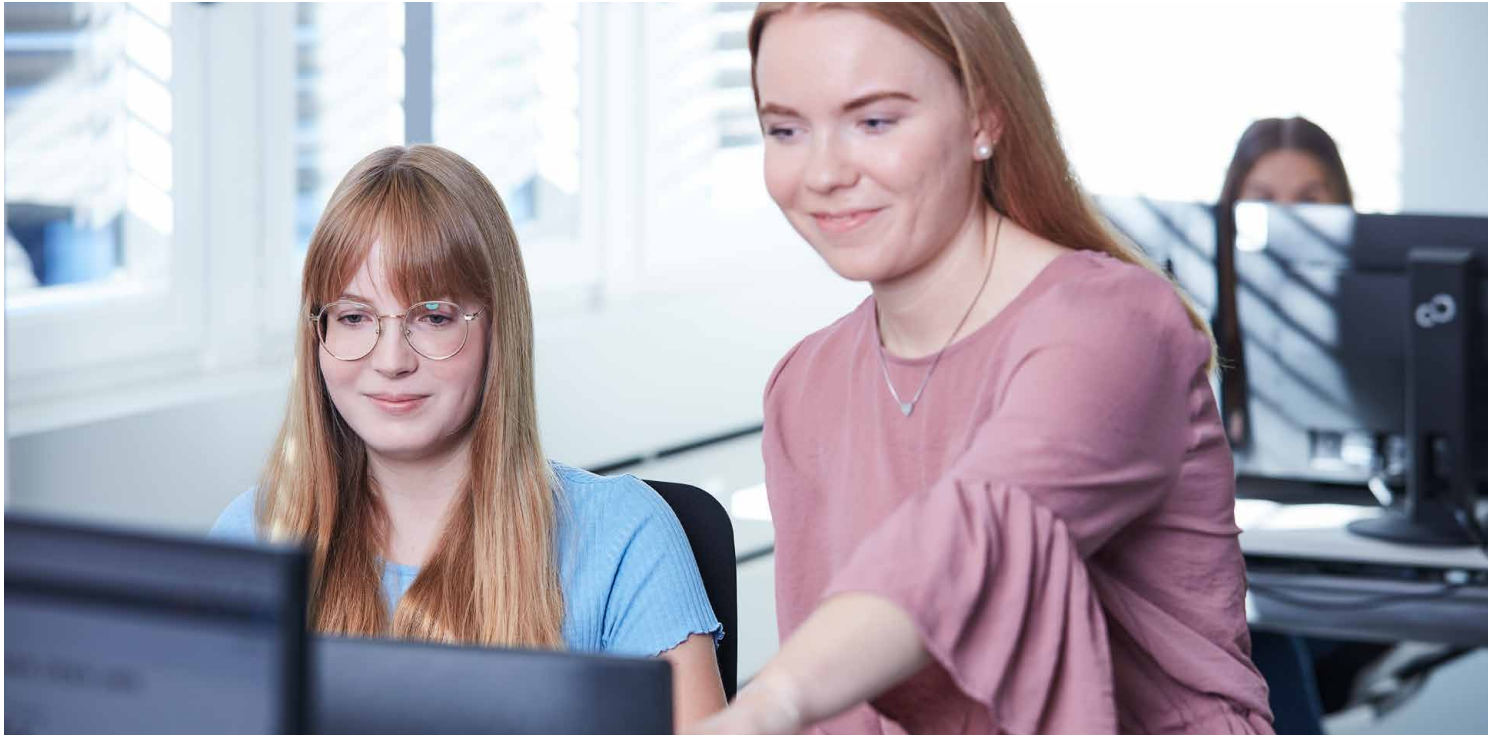
Combating money laundering and terrorist financing is of crucial importance for the integrity of our company, the growth of the economy and the security of society.

We support the fight against money laundering and the financing of terrorist activities. We check the identity of our business partners on a risk basis, refrain from cash transactions and

work with government authorities and international organizations to report and combat suspicious activities.

We respect and protect the business secrets of third parties and expect our business partners to respect and protect our business secrets in the same way. Our employees and decision-makers are obliged to treat confidential business information of both our own organization and our business partners confidentially and to comply with confidentiality obligations. We pursue a zero-tolerance policy towards insider trading, which we enforce consistently. Personal conflicts of interest must be avoided in business decisions, and it must be ensured that personal interests do not conflict with the interests of the company.

We undertake to process personal data exclusively in accordance with the applicable data protection principles. We respect the privacy of our business partners, employees and other data subjects and are committed to ensuring that their data is neither disclosed or altered without authorization nor misused.



## Support for fair competition

Fair competition is at the heart of a dynamic and fair economy. We firmly believe that fair competition not only benefits companies, but also society as a whole. In our pursuit of fairness, we are committed to upholding the principles of lawful, unrestricted and fair competition and respecting applicable national and international competition laws.

We respect the relevant antitrust regulations and do not participate in price fixing, the allocation of customers, markets or territories and market or supply agreements. We do not set prices and do not exchange sensitive/strategic information,

such as prices, conditions or other information that is classified as a trade secret, with our competitors. Furthermore, we are committed to promoting innovations that stimulate competition and offer society a wide range of high-quality products and services.

We recognize the importance of intellectual property as a driver of innovation and creativity. We therefore undertake to respect the intellectual property rights of third parties and to protect the intellectual property entrusted to us by our business partners.



## Commitment to the objectives of export control

We are aware of our responsibility in fulfilling export control objectives and are expressly committed to complying with Foreign Trade Regulations.

The Brand Group, its executive and management teams and its employees actively strive to promote peaceful coexistence. Business transactions may be subject to export control prohibitions, restrictions or authorization requirements with regard to the country of destination, business partner, goods or intended use.

By aligning our organization, processes and internal company guidelines accordingly, we ensure compliance with the applicable export control regulations.

Among other things, we have implemented an internal compliance program (ICP) and require our business partners to comply with export control regulations.

We do not tolerate any form of circumvention of sanctions within our sphere of influence and do not engage in this in any way.

If we become aware of business relationships that conflict with the provisions of Foreign Trade Law, we will take appropriate remedial measures immediately, up to and including the termination of the existing business relationship.



## Promoting togetherness

At our business locations, we want to be a good neighbor and part of society, respect existing rights and respond to the needs of local communities and their inhabitants. We create jobs and contribute to local value creation. We are committed to an open exchange and dialog between the local community and the respective site management in order to strengthen trust in our activities.



**Brand Group SE & Co. KG**

Frankfurt am Main | Germany

T +49 9342 808 0 | [info@brand.de](mailto:info@brand.de) | [group.brand.de](http://group.brand.de)

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