

BUSINESS ETHICS



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Business Ethics

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CODE OF CONDUCT

Foreword

Our Code of Conduct is a guide for the entire Brangs + Heinrich group, including all branches, and therefore applies to all of us equally. In detail it is aimed at top management, managers and all of our employees and our suppliers. On the one hand it represents the claim we place on ourselves to live up to the values and principles listed therein and at the same time signals responsible behavior towards our business partners, customers and our employees. We are committed to protecting the environment, preventing environmental pollution and continuous improvement.

Company management commitment

We see it as our duty to act economically, socially and environmentally consciously. Brangs + Heinrich strives to conduct its business competently and on an ethical basis and to compete fairly in all markets in which it operates. This includes compliance with the applicable laws and the acceptance of prohibitions on cartels and restrictions on competition. We want to avoid gaining improper advantages over customers, suppliers or competitors.

Implementation and enforcement

Brangs + Heinrich undertakes to make the necessary efforts to live up to the principles and values described in this Code of Conduct:

Solingen, 7th December 2023

DocuSigned by:
Stefan Vogelskamp
6F9F72C419404EC...

Stefan Vogelskamp
Managing Director



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Team spirit, constructive cooperation

We constantly question existing solutions and develop new ideas for the benefit of our customers. To this end, we encourage constructive teamwork among our employees. Your interests and demands on us are decisive for our work and further development. In cooperation, we are successful due to the diversity of our employees and their commitment in the business areas.

Standards of cooperation

We expect all of our employees to always act according to the highest professional standards and guidelines of our company. If employees violate existing guidelines, rules or regulations in the course of their work or through their behavior. This can have disciplinary, labor law or criminal law consequences.

Open communication with employees

We do not cover up wrongdoing. If our employees make a good faith report of actual or suspected misconduct we will not tolerate attempts at intimidation or retaliation against such individuals. We understand "good faith" to mean that our employees are convinced that their representation is correct. This applies regardless of whether a later investigation confirms the employees' version or not.

Trade secrets

All business information of our partners and their company secrets are always treated sensitively and confidentially. Passing on confidential information to third parties or making it publicly accessible is prohibited. Necessary documents are properly created, stored or if necessary, destroyed after the end of the cooperation. This applies to all employees even after the end of the employment relationship.

Customer focus

We treat our customers and business partners fairly and honestly. We record the wishes, needs and expectations of our customers and business partners in order to ensure a targeted implementation in products, services or other processes. Our ultimate goal is to build a long-term and stable relationship with our customers and business partners on the basis of trust.

Acceptance of gifts, donations

a) Gifts to our employees

Our employees do not demand or accept any personal benefits from customers or suppliers that influence or could influence their own behavior with regard to their work for the company. If gifts are offered by third parties these may only be accepted if they are common practice and can be recognized as a courtesy (e.g. meals, tickets



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to trade fairs or promotional gifts with the logo of the providing company, such as calendars or pens). In the case of gifts whose value exceeds the usual amount, the compliance officer or supervisor must be informed. If this is not possible, these gifts are to be rejected as a matter of principle.

b) Gifts from our employees

Gifts on our part may also only be offered within a framework customary for the business relationship and to a materially reasonable extent. The receiving person must not be able to associate this with any obligation that would influence their business decisions.

c) Donations

As a matter of principle, Brangs + Heinrich does not make donations to political parties, individuals or organizations whose goals contradict our corporate philosophy or damage our reputation. Donations are always made transparently.

Bribery, corruption and corruption

We do not tolerate any form of corruption or bribery, regardless of whether it harms our company assets or the assets of third parties. We use control mechanisms to ensure that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented.

Our employees are prohibited from accepting or giving favors of any kind (cash, travel, gifts, etc.) that are linked to an improper advantage (awarding of a contract, project award, etc.). If gifts are customary and courteous in a country, it must be ensured that no obligatory dependencies arise and that the national legal norms are observed. Violations are generally punished with labor law measures.

Our business partners are also required to avoid conflicts of interest that harbor a risk of corruption.

Data protection

We treat all personal data of our customers, business partners and employees with the greatest care. This includes names, addresses, telephone numbers and date of birth or information about the current state of health. Our employees are obliged to take all measures to secure the data that are suitable to protect our IT system from both internal and external data theft. This applies in particular to passwords misused in the company and unauthorized downloading of files, especially inappropriate material from the Internet.

Protection of the environment

The protection of the environment and climate protection are important to us. Our employees are required to treat all natural resources that are used in our company



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(e.g. energy, water and surfaces) with care. Our employees are expected to act responsibly in the manufacture and sale of our products and/or our services. To protect our employees, we comply with all laws and regulations relating to health and safety at work. To this end our managers in particular take measures to create a healthy and safe working environment for our employees. Our company guidelines for environmental protection must be observed and complied with.

Land, forest and water rights and evictions

When acquiring, developing or otherwise using land, forests and bodies of water the use of which secures a person's livelihood, we do not participate in illegal forced evictions or the illegal confiscation of land, forests and bodies of water.

Compliance with applicable law, economic sanctions

We oblige our managers to familiarize themselves with the laws, regulations and rules that are relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a great deal of responsibility when it comes to complying with the Code of Conduct. The business practices of our business partners and their suppliers must also comply with applicable laws. This applies in particular to import, export and domestic trade in goods, technologies or services, but also to payment and capital transactions. Breaches of economic embargoes and sanctions as well as trade, import and export control regulations are excluded by Brangs + Heinrich, as is terrorist financing.

Antitrust and competition law requirements

We are committed to fair competition and comply with the laws and regulations that protect competition. We refrain from agreeing on prices, conditions and strategies with competitors, suppliers, other companies and dealers that impede fair competition. We do not participate in any anti-competitive boycott.

Financial responsibility (accurate record)

Brangs + Heinrich adheres to the highest standards of honesty. It is imperative that the internal and external reports and documents that we prepare, publish or make available to the authorities are full, fair, accurate, timely and understandable. In addition, accurate records and reports of financial information are necessary to make responsible business decisions. All financial books, records and accounts must accurately reflect transactions and events and conform to generally accepted accounting principles and Brangs + Heinrich's internal control system.

Plagiarism

Brangs + Heinrich is committed to employing, implementing and maintaining effective methods and processes to identify and mitigate the risk of counterfeit parts and materials being introduced into our supply chain. If detected, we will implement



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effective procedures to quarantine the product and notify recipients of counterfeit products.

Dealing with company internals

It is important to us that the products manufactured, the work equipment used and the intellectual property of the company are handled carefully and responsibly.

Human rights

Internationally recognized human rights are expressly and consistently supported. Even in the event of disciplinary action all Company employees must be treated with dignity and respect. Such measures may only be taken in accordance with applicable national and international standards and internationally recognized human rights. We respect the rights of local populations, minorities, indigenous peoples and other vulnerable groups and strive to avoid negative impacts on them.

Non-Discrimination / Equal Opportunity / Ethical Recruitment

We do not tolerate any discrimination against our employees based on their origin, nationality, gender, age, skin color, religion or belief, sexual identity, disability, illness or pregnancy. We offer the same equal opportunities both when looking for new employees and during the employment relationship. We do not scam or mislead potential employees about the nature of the work. We never steal their IDs or charge them recruitment fees. At the beginning of the recruitment process, applicants receive a written contract of employment in a language they understand, which clearly and honestly describes their rights and obligations.

Protection against child or forced labor

We strictly reject child and any kind of exploitation of children and young people without exception and expect the same from our business partners. School-age children (under the age of 15) may not be employed even if the legal requirements of the respective country of our supplier would allow this. Any form of forced labour, debt bondage, serfdom and slave labor or slavery and similar conditions is rejected. Company employees must not be forced into employment, directly or indirectly, through violence or intimidation.

Wages, workers' rights

All employees should receive a fair wage for full-time employment that is at least sufficient to cover basic needs. The remuneration is to be paid out in a practical manner (cash, cheque, bank transfer) and an appropriate payroll is to be made available. Employees' rights to freedom of association, freedom of association, and collective and collective bargaining are respected to the extent permitted by law and possible in each country.



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Working hours

Working hours correspond to the applicable national law, the industry standard or the relevant ILO conventions. Overtime must be done on a voluntary basis.

Health and safety

The national and international regulations for ensuring health and safety at work are observed. Appropriate systems must be put in place to avoid risks to health and safety. Our company policy on occupational health and safety must be observed.

Use of private and public security forces

We do not commission and use private or public security forces to protect a business project if, due to a lack of instruction or control when deploying the security forces, the prohibition of torture and cruel, inhuman or degrading treatment is violated, life or limb is injured or freedom of association and association is violated is affected.

Conflicts of interest

Conflicts between the personal interests of our employees and the interests of Brangs + Heinrich are prohibited. In the context of business relationships with third parties, only objective criteria count.

Harassment

Brangs + Heinrich disapproves of physical, psychological or sexual violence.

Freedom of speech

The right to freedom of opinion and freedom of expression is guaranteed.

Privacy

Privacy is respected.

Standards and supporting documents

Universal Declaration of Human Rights - UN - Doc. 217, so-called UN Human Rights Charter / ILO Conventions v. 1948 and 98 of 194.

Situations in which you should take action

In our company we are all responsible for implementing the standards formulated in the guidelines. If you notice or have reasonable suspicion of illegal behavior or behavior contrary to this policy, you have an obligation to report the problem or seek advice:



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Examples of cases in which you should take action:

Evidence of Improper Gifts or Compensation.
 conducting insider trading.
 Kickbacks, kickbacks or unauthorized payments.
 Recognizable questionable behavior related to accounting or finance.
 Theft of company property or personal property.
 Orders bypassing the tendering process.
 discrimination or harassment.
 Verbal or physical threats.
 conflicts of interest
 Concerns about compliance with environmental, health or safety regulations.

Thanks and note

Thank you for taking the time to read this Code of Conduct carefully. This guideline is controlled in our management system as documented information i.e., regularly checked and, if necessary, adapted to the relevant requirements of interested parties.

A notice

Each manager is primarily responsible for instructing employees on the rules of the Code of Conduct for training them and for supervising implementation.

All employees are obliged to follow the regulations of the Code of Conduct and to proactively contribute to the improvement.



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COMPANY WHISTLEBLOWING POLICY

Scope

This guideline regulates the handling of whistleblowing for our company. It is valid for internal employees and external interest groups.

Responsibility

The management is responsible for the implementation and further development of this guideline.

Purpose and goals

Our company hereby regulates the handling of the following violations:

- Compliance violations of any kind
- Violations of the Code of Conduct
- Violations of law

The fundamental goal of the Whistleblower Policy is to force the detection and prevention of legal violations. At the same time whistleblowers and if applicable third parties / intermediaries who support the reporting should be better protected. It should be avoided that these persons have to fear negative consequences under civil, criminal or administrative law following a report. We expect that the supplier will also introduce such a procedure.

The whistleblowing guidelines ensure that we are perceived as a trustworthy partner and market participant by our business partners, customers and the general public. The whistleblowing guideline serves to comply with relevant legal requirements, standards and guidelines. By complying with the whistleblowing guideline, damage to the image of our company should be avoided. This protects the company's success and thus also secures jobs. The regulations on handling information are intended to help protect our trade secrets. The rules protect our company's assets.

Areas and content

Compliance with the legal system is essential if we act as a loyal business partner in business life. You are obliged to comply with the relevant laws, standards and guidelines when carrying out your work. If you have a reasonable suspicion that a violation of relevant laws, standards or guidelines has occurred, you must report this violation. If you can show specific indications that behavior violates relevant laws, standards or guidelines, you must report this violation.



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Notification, security requirements

If you notice a reportable violation, you are obliged to communicate this via a defined reporting channel. The reportable violation must be reported to the compliance officer:

- Mr. Peter Knöppke, 0212 2403 125, hinweis@brangs-heinrich.de

If you have any questions about this guideline, management must be informed. You do not need to fear any disadvantages if you submit a report. This does not apply to reports that are manifestly false or made in abuse of this policy.

Possible sanctions

This guideline is an internal regulation. Violation of this provision can have consequences under labor law as well as possibly criminal law.



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COMPANY GUIDELINES ON OCCUPATIONAL HEALTH AND SAFETY

Foreword

The following guidelines on occupational health and safety provide a detailed overview of the most important principles for our employees' health protection and the measures we take to ensure this.

Strict compliance with these rules protects us and our employees as well as all business partners who work on our premises. For this reason, we commit ourselves and all our employees to complying with them.

Work and Health protection

We understand occupational health and safety to mean the measures, means and methods to protect our employees from work-related health and safety hazards. Our primary goal is to prevent accidents at work and to protect the health of our employees and third parties. For this reason, we ensure that all legally required occupational safety measures and regulations are implemented, taking into account the circumstances.

Every manager is responsible for knowing the safety regulations and instructing their employees accordingly or ensuring that third parties instruct them accordingly. We and all supervisors and employees are equally responsible for consistent compliance. All employees must comply with the applicable national and European legal regulations and the accident prevention regulations of the trade association as a minimum standard, as well as the corresponding work instructions. How these regulations are to be implemented in day-to-day operations is trained in an annual safety briefing. Participation is mandatory for all employees.

Furthermore, all legal regulations also apply to external business partners who carry out work on our company premises.

Workplace Conditions and Environment

In addition to direct protective measures to avoid health and safety hazards, we also ensure a safe and healthy working environment. This includes in particular the following fields of action:

Use of resources

Unless private use is expressly permitted, all company facilities and systems may only be used for business purposes and for the appropriate purposes as a precautionary measure against accidents at work.



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The equipment used at the workplace corresponds to the relevant regulations. To ensure this, we keep all necessary permits and licenses up to date and carry out regular inspections and tests.

Handling of chemicals

Keeping risks as low as possible – that is what matters when dealing with chemicals. Always observe the information on the sticker on the container or packaging. Information on the proper storage and handling of chemicals. Always wear the required safety equipment, such as e. g. gloves or goggles. If you are unsure about handling or storage, speak to your supervisor immediately before working with the chemical.

Workplace ergonomics

As a further precautionary measure against accidents at work and, in particular, against occupational diseases, we set up all workplaces in accordance with statutory and generally recognized safety and occupational health rules, so that work can be carried out accident-free and with low stress.

Health promotion

We also support this by providing ergonomic aids and protective equipment as well as preventive programs and health promotion measures that maintain and promote the health, performance and job satisfaction of our employees. This includes in particular the possibility of bicycle leasing.

In addition, we also provide clean and adequate sanitary facilities as well as changing rooms, lounges and break rooms, which are freely accessible to our employees at all times.

Accident and incident management

Our accident and incident management is primarily based on the principle of prevention. In addition to the before mentioned regulations for the direct occupational health and safety protection of our employees, this primarily includes protection against fire, accidents and toxic substances.

Emergency preparedness

We achieve protection through preventive measures. This includes clear work instructions and regulations for accident prevention, compliance with which is monitored by the manager. These are supported by various technical devices, which include safety devices on the machines and systems as well as lighting, ventilation and heating systems. On the other hand, we achieve this protection through regular emergency training as part of our annual occupational safety training, the participation of which is obligatory for all employees. This includes, among other things, the correct use of personal protective equipment, the handling of hazardous



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substances and chemicals, skin and health protection, the handling of technical equipment, behavior in the event of fire and danger and first aid measures.

Accident report

If, despite all measures, an accident at work or other disruptions occur, these must be reported immediately, but no later than within three working days. This applies in particular to accidents at work that result in an employee or third party being unable to work. Such cases are reported to the responsible professional association as early as possible and documented in the first aid book. The accident report must contain the course of the accident, the consequences of the accident, the cause of the accident and the planned measures to avoid similar accidents in the future. The implementation of such measures should be designed and implemented as quickly as possible.

Fire protection

Fire protection is also based on preventive measures and follows the legal regulations. Behavior in the event of a fire is also taken into account in the annual safety briefing. In addition, trained fire protection assistants are appointed to support our employees with questions. In addition, all of our facilities and systems are designed in such a way that the risk of fire is kept as low as possible, which we ensure through regular maintenance and testing (e.g. by the TÜV or other testing institutes).



COMPANY POLICY ON ENVIRONMENTAL PROTECTION

Foreword

Brangs + Heinrich sees itself and all persons directly associated with the company and external providers as obligated to pollute the natural environment as little as possible through entrepreneurial activities. Since our actions in the area of our range of products and services are not possible without the consumption of natural resources, one focus of our efforts is on promoting sustainability in the use of these resources. The substitution of finite resources is an accompanying goal on this path. Currently unavoidable industrial and commercial waste is brought into the recycling cycle so that it can be fed back into the raw materials industry. Another field of action in environmental protection is energy saving in order to reduce greenhouse gas emissions and thus counteract climate change. We will neutralize unavoidable CO₂ emissions through certified climate protection projects.

We recognize our responsibility for future generations and want to ensure that they have a high quality of life in an intact environment with biological diversity. It corresponds to our firm belief that by taking environmental aspects into account throughout the life cycle of our products and services, we can preserve and improve resources for future generations.

The company management and all employees are equally responsible for the realization of our goals, for ecological protective measures and the avoidance of health risks for humans and animals.

This environmental guideline serves the purpose of developing a common understanding of values with coordinated objectives for environmental protection. The regulations contained therein should provide orientation in our everyday work and also show what behavior we demand from ourselves and others at all times in the interests of the environment.

This guideline is therefore binding for all areas of the company and for all employees. Brangs + Heinrich is committed to complying with legal regulations and other binding environmental protection obligations.

We ask all employees in their day-to-day work to inform their managers in a trusting and open manner if there is an obvious need for action to protect the environment. To make this possible, we sensitize our employees through training and information about the effects of our actions on the environment.

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Energy efficiency and renewable energies

Brangs + Heinrich focuses on reducing energy consumption and using renewable energies to improve sustainability when providing the necessary energies.

Reduction of energy consumption

The energy consumption is monitored, documented and reference values are calculated by "normalization", which are used as an energetic basis for the objectives of improving energy efficiency. The following measures to reduce consumption are derived from these findings:

- Replacement of energy-intensive machines and equipment
- Insulation of buildings to reduce the required heating energy
- Use of heat recovery
- use of photovoltaics
- Installation of motion sensors and timers
- Reduction of mobility through online tools

With comparable alternatives, we strive for the most economical solutions to improve energy efficiency and reduce energy consumption.

Raising our employees' awareness also represents potential for reducing energy consumption in daily working life. We therefore appeal to all employees to use the following energy-saving options:

- Turn off lights and appliances when not in use
- Use natural sunlight as much as possible
- Avoid unnecessary printing
- Set the room temperature for office space to 20 to 22 degrees Celsius
- Remember: Intermittent ventilation is more efficient than continuous ventilation
- Unplug the power cord or switch off the PC, notebook, monitor, etc. before leaving the building
- Use of renewable energies

The subject of strategic business planning at Brangs + Heinrich is the regular review of whether there are new opportunities to use renewable energies. We regard the substitution of fossil fuels by renewable energies as a competitive factor and therefore as an important part of corporate policy.

The following measures are currently being examined and may be implemented:

- Conversion to green electricity
- Use of photovoltaic systems to generate energy
- Use of wind energy by wind turbines
- Use of collectors to generate heat
- Conversion of the fleet to electric vehicles

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Greenhouse gas emissions, noise emissions and air quality

We have categorized and routinely monitor emissions and noise emissions that are released as part of our operational processes and activities. The following emissions are currently caused by us: CO2 emissions and noise emissions. The aim is to constantly reduce CO2 emissions (decarbonization). Unavoidable emissions of CO2 to the outside air are compensated accordingly by climate protection projects. When it comes to noise emissions, we pursue the goal of not influencing people, animals and the environment through noise and implement appropriate measures to achieve this goal.

If our emission-causing activities exceed legal or self-imposed limit values, we take appropriate state-of-the-art measures to limit and/or treat them to the permissible or justifiable level. Here, too, our primary goal in terms of emission control is avoiding emissions is better than treating them.

The quality and freedom from pollutants of the air in rooms within buildings in which our employees work is of particular importance to us since the indoor air quality has a major impact on the well-being and health of our employees.

Management of Natural Resources

Brangs + Heinrich strives to reduce the use and consumption of resources during processing and the to keep performance to a minimum. We strive to reduce or, at best, avoid the consumption of raw materials, auxiliary materials and supplies, as well as water and energy. Our quality management system provides us with valuable support here, in that we use preventive measures to limit faulty process results to a minimum.

Water occupies a special position among natural resources for us. With our view, we are following the European Union's Water Framework Directive, which aims to achieve and maintain a good status for surface water, groundwater and coastal water. In order to achieve the goal of "protecting water as a resource", we give priority to the following measures:

Groundwater protection through safe filling and filling processes as well as safe storage of water-polluting substances Avoiding the sealing of surfaces or using surface water to substitute fresh water Avoiding or reducing waste water from cleaning activities.

Here, too, we appeal to all employees to use the following options:

- Turn off the faucet while you soap your hands
- When flushing the toilet, use the partial flush button or the stop button

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Waste prevention / reuse / recycling and waste disposal

Brangs + Heinrich follows a systematic approach, primarily by taking measures to avoid waste, which always precede reuse or recycling or possible material recovery. By consistently separating the waste streams of all waste that arises, we ensure that all waste is disposed of in an environmentally friendly manner.

We ensure that waste is disposed of in accordance with the law and fulfill our obligations to provide evidence. In order to be able to prove this, we regularly create a total waste balance of all waste.

In the case of waste such as chemicals or other materials that pose a risk when released into the environment, we keep the necessary evidence of the legally compliant waste disposal. We make sure that safe handling is guaranteed when handling these substances, during transport, storage or recycling as well as reuse and disposal.

Biodiversity / animal welfare / biodiversity / land use / soil quality and deforestation
Biodiversity is a balanced and functioning environment based on the diversity of ecosystems, genetic diversity and the richness of species in animals, plants, fungi and microorganisms. The aim is to preserve and conserve biological diversity and its ecosystems. These include, in particular, responsible handling of our near-natural company areas with regard to their use and deforestation, preservation of soil quality, preservation and protection of biodiversity and animals.

Situations in which you should take action:

In our company, we are all responsible for implementing the standards formulated in the guidelines. If you notice, or have a reasonable suspicion of, behavior that is illegal or contrary to this Policy, you have an obligation to report the issue* or seek advice:



Examples of cases in which you should take action:

- Disposal of waste or residues in prohibited ways.
- Operation of facilities despite violation of permits.
- Blatant violations of energy saving regulations.
- Threat of contamination of the soil and thus of the groundwater by leaking chemicals.
- Inadmissible discharge of substances into the sewer or into a body of water.
- Removal of technical devices to reduce emissions.

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Poor air quality indoors with fear of pollution.

*In this context, please also note our company policy on whistleblowing

Thanks and note

Thank you for taking the time to read this Environmental Policy carefully. This guideline is controlled in our management system as documented information, i.e. regularly checked and, if necessary, adapted to the relevant requirements of interested parties.

A notice

Every **manager** is primarily responsible for communicating the regulations for protecting the environment to the employees and for instructing, training and supervising them.

All **employees** are obliged to comply with environmental protection regulations and to proactively contribute to improvement.



COMPANY GUIDELINES FOR SUPPLIERS

Intention of this guideline

This guideline is intended to formulate guidelines for the cooperation between the supplier and Brangs + Heinrich. The guideline names and regulates the quality assurance measures planned between the contractual partners. This policy applies to all products and services provided by the supplier. This guideline also extends to the requirements of DIN EN ISO 9001:2015 for the control of externally provided products and services. In addition, further individual quality assurance measures can be agreed between Brangs + Heinrich and the supplier.

Information about the products or services to be provided

Brangs + Heinrich provides a meaningful description of the order, such as order texts, specifications, data sheets, drawings; Specifications and/or samples are available in good time before the order is executed. The supplier shall immediately check whether any information submitted by Brangs + Heinrich is incorrect, unclear, incomplete or deviates from the sample. If the supplier recognizes that this is the case, he will inform Brangs + Heinrich in writing immediately and in good time before the start of the production process or the performance of the service.

Releases of products, services, methods, processes or equipment

The basis of every inquiry or order from Brangs + Heinrich is the supplier's assurance that the substances it supplies and substances in preparation that fall under REACH are pre-registered or registered. The supplier carries out a process planning taking into account the work plans, test plans, operating resources, tools, machines, etc. The supplier ensures the suitability of the production facilities operated at Brangs + Heinrich and at the sub-supplier or in his own production. This also includes ensuring proper and process-reliable use or operation of the products, systems and processes on site. If initial samples are ordered by Brangs + Heinrich, the supplier shall submit initial samples of the product manufactured under serial conditions in the agreed scope in a timely manner before the start of series production. All quality features agreed in writing with Brangs + Heinrich are checked by the supplier in order to prevent errors before the start of series production and to ensure that the required guidelines have been complied with.

Competence and qualification of the staff

The supplier organizes the professional training and further education of its employees who carry out quality-related activities within the framework of the contractual relationship. Brangs + Heinrich and the supplier meet at regular intervals to exchange and compare the knowledge gained.

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Supplier quality management system

The supplier maintains a quality management system certified according to DIN EN ISO 9001 or one based on this standard and undertakes to continuously improve its quality performance. The supplier uses quality assurance measures where errors can occur and places the basic idea of preventive and error-avoiding quality management in the foreground.

After the certificate has expired, the supplier is obliged to make the current version available to Brangs + Heinrich without being asked.

Quality management system of subcontractors

If the supplier procures products, production or test equipment, software, services, material or other pre-deliveries from sub-suppliers for the manufacture of the products or provision of the services that are in the agreed service portfolio or for their quality assurance, he will be these sub-suppliers in Include quality management system. Furthermore, he will use suitable measures to ensure and further develop the quality of the pre-deliveries. Brangs + Heinrich can request proof from the supplier of how the supplier has satisfied itself of the effectiveness of the quality management system of its sub-supplier.

Control and monitor performance

Before making changes to processes, procedures, materials or supplier parts for the products or relocating locations or taking other quality-influencing measures, the supplier will notify Brangs + Heinrich in good time so that the customer can check whether the changes are disadvantageous could affect the quality. The supplier undertakes to label products, parts and packaging in accordance with the specifications of Brang + Heinrich. It must ensure that the labeling of the packaged products remains legible during transport and storage. The supplier undertakes to ensure the traceability of the products it supplies and to process the delivered goods according to the fifo principle (first in first out). If an error is detected, traceability and the containment of defective parts, products, batches, etc. must be guaranteed. The supplier must document all quality assurance measures, in particular the measured values and test results . The obligation to keep the documents and records as well as any samples is at least 10 years.

Verification activities at the supplier

The supplier allows Brangs + Heinrich to determine through audits whether its quality assurance measures meet the agreed requirements of Brangs + Heinrich. After prior notification, an audit can be carried out as a system, process or product audit. In the event of a problem, the supplier will also make short-term requests for appointments possible. The supplier grants Brangs + Heinrich - and after prior agreement - its customers access to all relevant business premises, test centers, warehouses and adjacent areas as well as inspection of quality-related documents. In doing so, the customer accepts the necessary and appropriate restrictions imposed by the supplier to protect its trade secrets and the trade secrets of other customers of the supplier. If measures are necessary from the point of view of Brangs + Heinrich, the supplier

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undertakes to immediately draw up an action plan and implement the measures in a timely manner without unjustified delay and to inform Brangs + Heinrich of the results.

Delivery and control of the external provision

The supplier delivers the products in accordance with the packaging and delivery conditions of Brangs + Heinrich using suitable means of transport in order to prevent quality reductions. The incoming goods inspection at Brangs + Heinrich extends to externally visible damage and to determining compliance with the quantity and identity of the ordered products based on the delivery documents. Detected complaints are reported immediately.

Dealing with complaints, measures

If the supplier discovers a quality problem, the supplier will inform Brangs + Heinrich of this immediately and initiate appropriate remedial measures. In the event of process disruptions and quality deviations, the supplier analyzes the causes, initiates improvement measures and checks their effectiveness.

If, in exceptional cases, the supplier cannot provide services that conform to the specification, he must obtain special approval from Brangs + Heinrich prior to delivery. Instructions and suggestions from Brangs + Heinrich with regard to improving the quality of the products or services through changes in the process and in quality assurance will be taken into account by the supplier on his own responsibility within the scope of his possibilities.

After a careful examination, the supplier can approve the usability of products or results with errors and defects that do not lead to an impairment of the function, durability or even safety by means of a special release. However, special releases are not general releases and must be approved and checked separately for each individual case. They are therefore limited to a fixed period of time or a fixed scope. Special approvals do not release the supplier from applicable contractual guidelines and do not represent a general waiver of warranty and liability claims on the part of Brangs + Heinrich.

Dealing with the property of Brangs + Heinrich or the supplier

Insofar as Brangs + Heinrich or the supplier use means and facilities of the other contractual party, in particular means of production, testing and transport within the framework of the procurement of deliveries, these are "property of Brangs + Heinrich or external providers" within the meaning of Section 8.5.2. of DIN EN ISO 9001:2015. The respective owner is responsible for the integrity and proper functioning and, if necessary, for carrying out any necessary maintenance. In the event of incorrect use and the resulting damage, the owner arranges for repairs to be carried out. Special incidents including loss of funds and facilities are to be reported to the owner by the current owner.

Protection of information and data and confidentiality

The supplier must protect confidential information of Brangs + Heinrich. The supplier may not share the confidential information received in the course of the business

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relationship with anyone, unless this has been approved by Brangs + Heinrich. The supplier also undertakes to maintain secrecy about all processes, methods, constructions, samples or recipes that were developed directly and indirectly for Brangs + Heinrich. Reproduction or the transfer of technologies to third parties is excluded. Any deviation from this regulation requires the written approval of Brangs + Heinrich. The duty of confidentiality applies to everyone and continues to apply even after the end of the business relationship. The supplier hereby approves unlimited compensation for damages in the event of a breach of the non-disclosure clause.

Insurance obligation of the supplier

The supplier is obliged to take out product liability and recall cost liability insurance with coverage for personal injury, property damage and financial loss of at least EUR 5,000,000 per claim.

Safety at work

The supplier undertakes to comply with all statutory provisions on occupational safety. If the supplier performs work on the premises of Brangs + Heinrich, he will comply with the relevant safety and accident prevention regulations of Brangs + Heinrich and take into account instructions from Brangs + Heinrich on behavior on the premises. He will inform his employees independently about the valid regulations of Brangs + Heinrich. We expect that the supplier provides a safe workplace and has established policies and practices to minimize the risk of accidents, injuries and health risks.

Environmental Protection

The aim is to protect our shared environment by using the resources required to provide our services responsibly. We can only achieve this goal if environmental aspects are already taken into account when selecting the scope of supplies in the form of raw materials, auxiliary materials and supplies, machines and equipment, but also services. When subcontracting orders to third parties, our suppliers must ensure that their suppliers are aware of these guidelines.

Basic requirements

Legal requirements of environmental protection, trade association regulations, etc. must be observed. Legal prohibitions on substances must be observed.

The legal requirements for "commissioned persons" must be named and supported. The staff must be trained accordingly and instructed in their work with regard to environmentally relevant aspects. Plans are drawn up and practiced regularly for possible emergencies.

Systemic defaults

Impacts on the environment (environmental aspects) should be monitored taking into account the life cycle. Procedures with high environmental relevance should be documented. In order to avoid waste and unnecessary packaging, reusable systems

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should be preferred (target for the share of reusable packaging). If the protection of the goods requires disposable packaging, environmentally friendly, recyclable materials must be used (target for the recycling rate). Unavoidable waste is to be recycled as far as possible. If this is not possible, they must be disposed of professionally and in accordance with the law.

Operational Requirements

The handling of hazardous substances must be clearly and effectively regulated. Production facilities and environmentally relevant infrastructure should be in an environmentally friendly condition. Resources and material must be used responsibly.

Perspective requirements

If not yet implemented, the aim should be to introduce and certify an environmental and energy management system.

Code of Conduct for suppliers

Brangs + Heinrich has defined a code of conduct that applies to the entire company. We are committed to acting and operating honestly, responsibly, ethically and lawfully. Respect, tolerance, honesty and openness as well as integrity towards employees and customers as well as the willingness to assume social responsibility are the cornerstones of the code of conduct. The Code of Conduct is based on applicable laws and regulations as well as international conventions. In addition, we have committed ourselves to the code of conduct of the GKV (Society of the Plastics Processing Industry e. V.).

As part of this voluntary commitment to comply with the principles listed, we also expect our suppliers and business partners to comply with the following comparable standards:

Scope

This code of conduct applies to all branches and production sites of the supplier.

Laws, standards and ethical behavior

The supplier complies with the applicable laws and standards of the respective countries in which it operates. It is based on universal ethical values and principles, in particular integrity, honesty and human dignity.

Business partners, authorities and consumers

The supplier will practice in accordance with generally accepted business practices of fairness and honesty. It maintains a trusting relationship with authorities. Consumer protection standards are observed.

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Team spirit, constructive cooperation

The supplier repeatedly questions existing solutions and develops new ideas for the benefit of its customers. To this end, he promotes constructive teamwork among employees. Their interests and demands on the supplier are decisive for their work and further development. In the cooperation, the supplier is successful due to the diversity of the employees and their commitment in the business areas.

Standards of cooperation

The supplier expects all of its employees to always act according to the highest professional standards and guidelines of this company. If employees violate existing guidelines, rules or regulations in the course of their work or through their behavior, this can have disciplinary, labor law or criminal law consequences.

Open communication with employees

The supplier does not cover up misconduct. If his employees report actual or suspected misconduct in good faith, he will not tolerate any attempts at intimidation or retaliation against such individuals. The supplier understands "in good faith" to mean that the employees are convinced that their representation corresponds to the truth. This applies regardless of whether a later investigation confirms the employees' version or not.

Trade secrets

All business information and trade secrets are always treated sensitively and confidentially. Passing on confidential information to third parties or making it publicly accessible is prohibited. Necessary documents are properly created, stored or, if necessary, destroyed after the end of the cooperation. This applies to all employees even after the end of the employment relationship.

Customer focus

The supplier behaves fairly and honestly towards customers and business partners. He records the wishes, needs and expectations of his customers and business partners in order to ensure a targeted implementation in products, services or other processes. The primary goal is to build a long-term and stable relationship with customers and business partners on the basis of trust.

Acceptance of gifts, donations

a) Gifts to employees

Employees do not demand or accept any personal benefits from customers or suppliers that influence or could influence their own behavior with regard to their work for the company. If gifts are offered by third parties, these may only be accepted if they are common practice and can be recognized as a courtesy or courtesy (meals, tickets to trade fairs or promotional gifts with the logo of the providing company, such as calendars or pens). In the case of gifts whose value exceeds the usual amount, the compliance

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officer or supervisor must be informed. If this is not possible, these gifts are to be rejected as a matter of principle.

b) Gifts from employees

Likewise, gifts from the supplier may only be offered within the scope customary for the business relationship and to a materially reasonable extent. The receiving person must not be able to associate this with any obligation that would influence their business decisions.

c) Donations

As a matter of principle, the supplier does not make donations to political parties, to individuals or to organizations whose goals contradict our corporate philosophy or damage our reputation. Donations are always made transparently.

Bribery, corruption and corruption

The supplier does not tolerate any form of corruption and bribery, regardless of whether it damages the company's own assets or the assets of third parties. The supplier uses control mechanisms to ensure that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented.

Employees are prohibited from accepting or giving favors of any kind (cash, travel, gifts, etc.) that are linked to an improper advantage (awarding of a contract, project award, etc.). If gifts are customary and courteous in a country, it must be ensured that no obligatory dependencies arise and that the national legal norms are observed. Violations are generally punished with labor law measures.

Its business partners are also required to avoid conflicts of interest that harbor a risk of corruption.

Data protection

The supplier treats all personal data of customers, business partners and employees with the greatest care. This includes names, addresses, telephone numbers and date of birth or information about the current state of health. Its employees are obliged to take all measures to secure the data that are suitable for protecting our IT system from both internal and external data theft. This applies in particular to passwords misused in the company and unauthorized downloading of files, especially inappropriate material from the Internet.

Protection of the environment

The protection of the environment and climate protection are important concerns for the supplier. The employees are required to treat all natural resources that are used in our company (e.g. energy, water and surfaces) with care. Employees are expected to act responsibly in the manufacture and sale of our products and/or our services. To protect its employees, the supplier shall comply with all laws and regulations relating to health and safety at work. To this end, measures are taken by its managers in particular to create a healthy and safe working environment for employees.

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Land, forest and water rights and evictions

When acquiring, developing or otherwise using land, forests and bodies of water, the use of which secures a person's livelihood, the supplier shall not participate in an illegal forced eviction or the illegal confiscation of land, forests and bodies of water.

Compliance with applicable law, economic sanctions

The supplier obliges its managers to familiarize themselves with the laws, regulations and rules that are relevant to their area of responsibility and to comply with them without exception. Managers bear a high level of responsibility when it comes to complying with the Code of Conduct. The business practices of its business partners and their suppliers must also comply with applicable laws. This applies in particular to import, export and domestic trade in goods, technologies or services, but also to payment and capital transactions. Violation of economic embargoes and sanctions, as well as Trade, import and export control regulations are also excluded by the supplier, as is terrorist financing.

Antitrust and competition law requirements

The supplier is committed to fair competition and adheres to the laws and regulations that protect competition. He refrains from agreeing on prices, conditions and strategies with competitors, suppliers, other companies and dealers that impede fair competition. The supplier does not participate in any anti-competitive boycott.

Financial responsibility (accurate record)

The supplier follows the highest standards of honesty. It is imperative that the internal and external reports and documents that he prepares, publishes or makes available to the authorities are full, fair, accurate, timely and understandable accounts. In addition, accurate records and reports of financial information are necessary to make responsible business decisions. All financial books, records and accounts must accurately reflect transactions and events and conform to generally accepted accounting standards and the supplier's internal control system.

Plagiarism

The supplier undertakes to use, implement and maintain effective methods and processes to detect and minimize the risk of introducing counterfeit parts and materials into its supply chain. If detected, we will implement effective procedures to quarantine the product and notify recipients of counterfeit products.

Dealing with company internals

It is important to the supplier that the manufactured products, the work equipment used and the intellectual property of the company are handled carefully and responsibly.

Human rights

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Internationally recognized human rights are expressly and consistently supported. Even in the event of disciplinary action, all Company employees must be treated with dignity and respect. Such measures may only be taken in accordance with applicable national and international standards and internationally recognized human rights. The supplier respects the rights of local populations, minorities, indigenous peoples and other vulnerable groups and strives to avoid negative impacts on them.

Non-Discrimination / Equal Opportunity / Ethical Recruitment

The supplier does not tolerate any discrimination against its employees based on their origin, their nationality, their gender, their age, their skin color, their religion or belief, their sexual identity, their disability, their illness or their pregnancy. It offers the same equal opportunities both when looking for new employees and during the employment relationship.

Potential employees will not be scammed by the supplier or misled about the nature of the work. He never steals their IDs or charge them hiring fees. At the beginning of the recruitment process, applicants receive a written contract of employment in a language they understand, which clearly and honestly describes their rights and obligations.

Protection against child or forced labor

The supplier strictly rejects child and any kind of exploitation of children and young people without exception and expects the same from its business partners. School-age children (under the age of 15) may not be employed even if the legal requirements of the respective country of our supplier would allow this. Any form of forced labour, debt bondage, serfdom and slave labor or slavery and similar conditions is rejected. Company employees must not be forced into employment, directly or indirectly, through violence or intimidation.

Wages, workers' rights

All employees should receive a fair wage for full-time employment that is at least sufficient to cover basic needs. The remuneration is to be paid out in a practical manner (cash, cheque, bank transfer) and an appropriate payslip is to be made available. Employees' rights to freedom of association, freedom of association, and collective and collective bargaining are respected to the extent permitted by law and possible in each country.

Working hours

Working hours correspond to the applicable national law, the industry standard or the relevant ILO conventions . Overtime must be done on a voluntary basis.

Health and safety

The national and international regulations for ensuring health and safety at work are observed. Appropriate systems must be put in place to avoid risks to health and safety. Our company policy on occupational health and safety must be observed.

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Use of private and public security forces

The supplier does not commission and use private or public security forces to protect an entrepreneurial project if the prohibition of torture and cruel, inhuman or degrading treatment is disregarded, life or limb is injured or the association and freedom of association is impaired.

Conflicts of interest

Conflicts between the personal interests of its employees and the interests of the supplier are prohibited. In the context of business relationships with third parties, only objective criteria count.

Harassment

The supplier disapproves of physical, psychological or sexual violence.

Freedom of speech

The right to freedom of opinion and freedom of expression is guaranteed.

Privacy

Privacy is respected.

Whistleblowing, protection from retaliation

The fundamental goal of the Whistleblower Policy is to force the detection and prevention of legal violations. At the same time, however, the whistleblowers and, if necessary, third parties / intermediaries who support the reporting should be better protected. It should be avoided that these persons have to fear negative consequences under civil, criminal or administrative law following a report. We expect that the supplier will also introduce such a procedure.

Our company regulates the handling of the following violations for internal employees and external interest groups:

- Compliance violations of any kind
- Violations of the Code of Conduct
- Violations of law

If the supplier notices a reportable violation, the supplier is obliged to communicate this via a defined reporting channel. The reportable violation must be reported to the compliance officer:

- Mr. Peter Knöppke, 0212 2403 125, hinweis@brangs-heinrich.de

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Measures

The supplier shall bring this code of conduct or an equivalent code of his own to the attention of his company employees in a suitable manner and at specified intervals and shall ensure that it is complied with.

Environmental guidelines for suppliers

Purpose

The aim is to protect our shared environment by using the resources required to provide services responsibly. We can only achieve this goal if environmental aspects are already taken into account when selecting the scope of supplies in the form of raw materials, auxiliary materials and supplies, machines and equipment, but also services. When subcontracting orders to third parties, our suppliers must ensure that their suppliers are aware of these guidelines.

Basic requirements

Legal requirements of environmental protection, trade association regulations, etc. must be observed. Legal prohibitions on substances must be observed. The legal requirements for "commissioned persons" must be named and supported. The staff must be trained accordingly and instructed in their work with regard to environmentally relevant aspects. Plans are drawn up and practiced regularly for possible emergencies.

Systemic defaults

Impacts on the environment (environmental aspects) should be monitored taking into account the life cycle. Procedures with high environmental relevance should be documented. In order to avoid waste and unnecessary packaging, reusable systems should be preferred (target for the share of reusable packaging). If the protection of the goods requires disposable packaging, environmentally friendly, recyclable materials must be used (target for the recycling rate). Unavoidable waste is to be recycled as far as possible. If this is not possible, they must be disposed of professionally and in accordance with the law.

Operational Requirements

The handling of hazardous substances must be clearly and effectively regulated. Production facilities and environmentally relevant infrastructure should be in an environmentally friendly condition. Resources and material must be used responsibly.

perspective requirements

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Management of Natural Resources

The supplier strives to reduce the use and consumption of resources during processing and the to keep performance to a minimum. The supplier strives to reduce or, in the best case, avoid the consumption of raw materials, but also of auxiliary and operating materials as well as water and energy.

Water quality and consumption

Water occupies a special position among natural resources for us. With his view, the supplier follows the water framework directive of the European Community or that of the respective resident country outside the EU, which wants to achieve and maintain a good status for surface water, groundwater and coastal water. In order to achieve the goal of “protecting water as a resource”, he gives priority to the following measures:

- Groundwater protection through safe filling and filling processes as well as safe storage of water-endangering substances.
- Avoiding the sealing of surfaces or using surface water to substitute fresh water.
- Avoidance or reduction of wastewater from cleaning activities.

Greenhouse gas emissions and air quality

Emissions that are released as part of operational processes and activities are routinely observed, categorized and monitored. The supplier pursues the goal of constantly reducing CO2 emissions (decarbonization) and takes appropriate measures. In the case of noise emissions, the supplier pursues the goal of not influencing people, animals and the environment through noise and implements appropriate measures to achieve the goal.

If the emissions-causing activities exceed legal or self-imposed limit values, the supplier will take appropriate measures according to the state of the art to limit and/or treat them to the permissible or justifiable level. Here, too, the primary goal in terms of immission control is: avoiding emissions is better than treating them.

The quality and freedom from pollutants of the air in rooms within buildings in which our employees work is of particular importance to us because since the indoor air quality has a major impact on the well-being and health of our employees.

Waste prevention / reuse / recycling and waste disposal

The supplier follows a systematic approach, primarily by taking measures to avoid waste, which always precede reuse or recycling or possible material recovery. By consistently separating the waste streams of all waste, he ensures that all waste is disposed of in an environmentally friendly manner.

The supplier ensures that the waste is disposed of in accordance with the law and fulfills its obligations to provide evidence. He regularly creates an overall waste balance of all waste.

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In the case of waste such as chemicals or other materials that pose a risk when released into the environment, he keeps the necessary evidence of the lawful waste disposal. The supplier ensures that safe handling is guaranteed when handling these substances, during transport, storage or recycling as well as reuse and disposal.

Biodiversity / Animal Welfare / Biodiversity / Land Use / Soil Quality and deforestation

Biodiversity is a balanced and functioning environment based on the diversity of ecosystems, genetic diversity and the richness of species in animals, plants, fungi and microorganisms. The aim is to preserve and conserve biological diversity and its ecosystems. These include, in particular, responsible handling of our near-natural company areas with regard to their use and deforestation, preservation of soil quality, preservation and protection of biodiversity and animals.

Responsible chemical management

Keeping risks as low as possible – that is what matters when dealing with chemicals. The supplier always observes the applicable legal provisions for handling chemicals. Instructions on the containers or packaging are followed as well as instructions for proper storage or professional and environmentally friendly disposal of chemicals and their handling.