

# MAXIM GROUP CODE OF CONDUCT FOR SUPPLIERS

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## 1. Why a Supplier Code of Conduct?

At MAXIM Group, our success is based on the trust that business customers and users place in us. We justify this trust every day through uncompromising product quality, innovation, and comprehensive service. As a leading manufacturer of products that people use for their daily oral and body care, responsibility for the quality and safety of our products is a paradigm for us. But responsibility means more to us than that. We are aware that our success does not only depend on high quality, product development, and a strong customer focus. It is also grounded in assuming social and environmental responsibility and being a fair and transparent partner at all times.

We expect all members of MAXIM Group to observe principles and standards of ethical and sustainable behavior at all times – making them an integral part of our corporate culture. This is why we revised the Code of Conduct that is binding for our employees in 2024.

As our understanding of responsible and sustainable conduct extends along our entire value chain, we also involve our suppliers. Being convinced that we can make a more meaningful contribution to sustainable development together, this Supplier Code of Conduct serves as a foundation for jointly implementing environmental, social and governance (ESG) principles. Grounded in the UN Guiding Principles on Business and Human Rights, the Declaration on Fundamental Principles and Rights at Work by the International Labour Organization (ILO) as well as the Guiding Principles of the Organization for Economic Cooperation and Development (OECD), this Code supports our aim of building business relationship based on integrity, fairness and responsibility.

Our suppliers agree to comply with the principles and requirements of this Code of Conduct and to pass on the values and norms set forth in this document to their suppliers and subcontractors – taking into account their respective capabilities and financial means.

We look forward to establishing and expanding our business relations with you as our supplier on the following principles of good corporate governance and social and environmental sustainability.

## 2. Responsible business conduct

*As a supplier of MAXIM Group, we are committed to the following principles of responsible business conduct, strengthening fair and compliant behavior in our own operations and along our value chain.*

### **Compliance**

- We comply with all laws and regulations of the respective legal frameworks applying to us.

### **Fair business practices**

- Combating corruption and bribery
  - We do not tolerate any form of corruption or bribery and do not become involved in it – neither directly nor indirectly.
  - We do not grant, offer or promise anything of value to government officials or representatives from the private sector in order to influence official acts or gain an unjustified advantage.
- Fair competition, antitrust law and intellectual property
  - We act in accordance with national and international competition laws and do not engage in price, market or bid rigging with competitors.
  - We respect the intellectual property rights of others.
- Conflicts of interest
  - We avoid conflicts of interest that could negatively influence our business relations with MAXIM Group.
  - In case of possible conflicts, we disclose them to MAXIM Group.
- Money laundering
  - We do not participate directly or indirectly in forms of money laundering and do not facilitate them.

### **Data protection**

- We process personal data confidentially and responsibly.
- We respect the privacy of every individual and ensure that personal data is effectively protected and used only for legitimate purposes.

### **Export control and customs issues**

- We comply with all applicable export control and customs regulations.

### **Responsibility in the supply chain**

- We make reasonable efforts to communicate the principles put forth by this Code of Conduct to our suppliers and subcontractors and to ensure compliance with them.
- We make reasonable efforts to avoid using raw materials in our products that originate from conflict and high-risk areas and contribute to human rights abuses, corruption, or funding of armed groups.

## **3. Social Responsibility**

*As a supplier of MAXIM Group, we are committed to the following principles of social responsibility. We create and maintain a fair, inclusive and protective working environment in which employees can develop based on their different skills, knowledge, perspectives, experience, and personal characteristics. We attach great importance to respecting the human rights of rights holders or groups of rights holders that are particularly vulnerable such as women, children or migrant workers as well as indigenous groups.*

### **Non-discrimination and respect for employee rights**

- We promote equal opportunities and equal treatment for all employees, regardless of ethnic origin, skin color, age, gender identity, aptitude, sexual orientation, religion or other characteristics.
- We prohibit and sanction all forms of sexual harassment or discrimination.

### **Prohibition of forced labor**

- We do not use or support any form of slavery, servitude, forced or compulsory labor, or human trafficking.

### **Prohibition of child labor**

- We do not employ workers under the age of 15 in any way that is harmful to their physical or psychological development.
- We do not employ workers under the age of 18 for hazardous work in accordance with International Labor Organization Convention 182.

### **Health and safety of employees**

- We act in accordance with applicable legal, international and industry standards on occupational health and safety and provide safe working conditions.

- We provide instruction and training to ensure that employees know how to deal with occupational health and safety issues.
- We implement a reasonable occupational health and safety management system.

#### **Working Hours, Wages and Benefits for Employees**

- We recognize the legal right of employees to form or join unions and to bargain collectively.
- We do not discriminate against members of employee organizations or unions in any way.
- We comply with all working time regulations relevant to us in the countries and industries in which we operate.
- We pay fair wages and comply with all applicable wage and compensation laws.

## **4. Environmental responsibility**

*As a supplier of MAXIM Group, we are committed to the following principles of environmental protection and sustainability. The protection of our climate and the sustainable use of natural resources as well as the promotion of circular economy solutions are of particular importance to us.*

#### **Compliance with applicable environmental standards**

- We comply with all applicable environmental regulations.
- When doing so, we pursue an environmentally friendly development, production, transport, use and disposal of our products.

#### **Use of resources**

- We use resources efficiently, employ energy-efficient and environmentally friendly technologies, and reduce waste.
- We actively participate in the development and use of circular economy concepts to keep valuable materials in a cycle.
- We take appropriate organizational and technical measures to reduce water consumption, as far as possible and reasonable under economic considerations, and to prevent the contamination of surface or groundwater in our own manufacturing process or in procurement.

#### **Protection of climate and biodiversity**

- We reduce our negative impact on climate change and biodiversity in order to protect people's livelihoods.

## 5. Transparency and reporting of violations

*As a supplier of MAXIM Group, we are committed to principles of transparency and do not attempt to conceal relevant information from our business partners. We also involve our employees in identifying potential and factual behavior that violates the principles of this Code of Conduct.*

### Transparency

- We maintain transparency towards our stakeholders and do not conceal any information relevant to the respective stakeholder group, particularly not in cases where disclosure is mandatory because of legal or regulatory requirements.

### Reporting violations

- If we become aware of violations of this Code of Conduct, we immediately inform MAXIM Group as our business partner.
- We give our employees the opportunity to inform us of potential or actual violations of this Code of Conduct in a secure, confidential and, if necessary, anonymous manner.
- In turn, we encourage our business partners to also set up a whistleblowing channel and to promote appropriate reporting options along their supply chain.

### Complaint mechanism for employees

- MAXIM Group is committed to effective compliance
- Compliance means respecting the law and MAXIM Group's internal rules as well as creating structures so that MAXIM Group, the company management and all its employees may behave lawfully.
- We provide a channel for our employees ("whistleblower system") to report possible violations of the principles of this Code of Conduct in a safe and anonymous manner.
- The Compliance Ombudsperson and the ISO 27001 certified whistleblowing system [HINWEISGEBERPORTAL EN | MAXIM Markenprodukte GmbH & Co. KG \(maxim-group.net\)](https://www.maxim-group.net/HINWEISGEBERPORTAL-EN) are part of MAXIM Group's compliance system and compliance culture.

## 6. Auditing and assessment

*We acknowledge that MAXIM Group reserves the right to conduct audits or assessments itself or through third parties to ensure that we comply with laws, rules and the principles stated in this Code of Conduct. The corresponding audits may be announced or unannounced.*

*In addition, we acknowledge that in the event of violations of this Code of Conduct on our part, MAXIM Group reserves the right to take appropriate measures regarding our contractual relationship. This entails the right to terminate existing contracts if the principles stated in this Code of Conduct are*

*violated and no effective remedial measures are taken by us after having being requested by MAXIM Group to do so, or if recurring systematic violations on our part are apparent.*

*Further contractual obligations remain unaffected by this Code of Conduct and take precedence over the provisions described in this document.*