



# Code of Conduct

## for Business Partners of Jebsen & Jessen Hamburg Group

### Dear Business Partners,

All actions of staff members of Jebsen & Jessen Hamburg Group are based upon our fundamental values. We live these values in our day-to-day dealings with each other as well as in cooperating with our business partners such as customers, suppliers, agents, consultants, solicitors and other service providers acting with, for or on behalf of Jebsen & Jessen (GmbH & Co.) KG or one of its subsidiaries. We expect our business partners to accept these values with regard to their employees as well as to third parties as their own values – only then we can ensure sustainability.

### Our Fundamental Values

#### **Open-minded**

Everyone is welcome here!

#### **Competent**

We are experts in our field!

#### **Innovative**

We promote entrepreneurial spirit!

#### **Family-spirit**

We live family business!

Fritz von der Schulenburg  
Managing Partner & CEO Jebsen & Jessen (GmbH & Co.) KG

## **Social Responsibility**

We expect our business partners to be aware of their responsibility towards their staff, their customers and business partners as well as towards society and its underlying principles. Thus, we expect them to observe the personal dignity of every individual and to not tolerate discrimination of any kind, neither because of race, gender, disabilities or age, nor because of sexual orientation, religion or belief. We also expect the commitment to human rights and to international standards for the protection of workers.

With the awareness for the scarceness of resources, our business partners have to be guided by the principles of sustainability. This includes a responsible treatment of the environment as well as measures for labour safety and personal security that ensure the physical and mental integrity of their staff.

## **Child Labour**

Child labour is any work that is done by a person under the age of 15 unless local law provides for a higher minimum age for workers or a longer duration of compulsory education, in which case the higher age shall prevail. If however – in accordance with the conditions laid down exceptions for developing countries in the ILO Convention 138 – the legal age is 14 years, the lower age will prevail. Jebesen & Jessen Hamburg Group will not use child labour and expects the same from its business partners.

## **Forced Labour**

Forced labour is any work or service which is exacted from other persons under the menace of a penalty for which those persons do not make themselves available voluntarily. Our business partners must not use or tolerate forced labour, bonded labour or prison labour. In the employment process, our business partners must not require bail or personal documents from their employees.

## **Ban on corruption**

Corruption occurs primarily in the form of bribery of public officials or the unlawful act of accepting or granting benefits from or to others. Corruption leads to wrong decisions of enterprises and national economies that hamper progress and innovation and distort competition. The various forms of corruption are forbidden by law in Germany and most countries of the world. Our business partners do not use corrupt means of any kind for business purposes.

## **Benefits for Third Parties**

Good relations to business partners are a precondition for business success. At no time may undue influence be used in maintaining these business relations.

Our business partners must not offer or procure improper benefits to or from third parties. None of their employees may demand or accept improper benefits. Gratuities in the form of presents, invitations to business entertainment or events, donations or sponsoring which may be capable of influencing business decisions of partners, may be interpreted as corruption.

Even the impression of potential exertion of influence should be avoided.

## **Fair Competition and Purchase**

Freedom of competition is a tremendous economic asset which is protected in Germany and most other countries worldwide through strict laws governing competition and cartels.

Prohibited in particular are agreements and concerted practices between competitors causing or aiming at a prevention or limitation of competition.

Furthermore, it is not allowed to take advantage of a dominating position in the markets.

Our business partners will not engage in any kind of agreements with third parties that could be relevant for the competition between the business partner and that company.

Also, they will not give preference to a supplier or service provider without demonstrable and objective justification, but consider requirements for example of the Supply Chain Due Diligence Act.

## **Export Control and Ban on Money Laundering**

Jebsen & Jessen Hamburg Group ensures compliance with all regulations for the export of goods, services or information in accordance with the prevailing legislation on export control. Our suppliers and other business partners have the same duty and responsibility.

Jebsen & Jessen Hamburg Group also ensures compliance with the ban on money laundering enforced in most countries and expects this in the same way from its business partners.

## **Protection of Data and Information**

Even prior to completing a confidentiality agreement, Jebsen & Jessen Hamburg Group treats data and information from its business partners as confidential under applicable laws and complying with legal or regulatory disclosure obligations. In return, Jebsen & Jessen Hamburg Group expects the same from them.

In particular, the respective applicable legal and internal regulations for the protection of personal data and for data and information security must be observed.

## **Conflicts of Interests**

We expect our business partners to make decisions with respect to mutual business activities on the basis of objective criteria.

Conflicts of interest with private matters or with other economic or ulterior activities are to be avoided from the beginning. This also applies to relatives or otherwise close people or organisations.

## **Transparency**

Our business partners document the services they provide in a transparent and comprehensible manner. They can always vouch for all cash flows in connection with Jebsen & Jessen Hamburg Group.

## Ramifications

Any violation of the principles and requirements laid down herein will be regarded as a substantial impairment of the contract by the business partner. When suspecting non-compliance with this Code of Conduct (e.g. induced by negative media reports), Jebsen & Jessen Hamburg Group will request information on the corresponding facts.

Jebsen & Jessen Hamburg Group reserves the right to terminate, extraordinarily and without notice, any or all contractual relations with such business partners that verifiably violate the principles set out herein without taking measures for improvement after a reasonable period of time set by Jebsen & Jessen Hamburg Group has elapsed.

We generally refrain from using multi-gender expressions in order to maintain the comprehensibility and readability of our documents, without intending to express any form of discrimination.

## Contact

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