

MEY CODE OF CONDUCT

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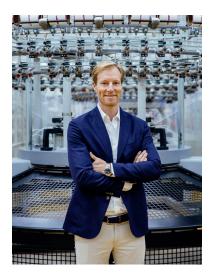
PREAMBLE

As an internationally working company that operates in a resource-intensive industry which is repeatedly criticized for its impact on people and the environment, mey is aware of its corporate responsibility. In order to live up to this responsibility, mey is committed to the UN Convention on Human Rights and the conventions of the International Labour Organization (ILO) as well as the OECD Guidelines for Multinational Enterprises, in particular regarding to the topics of prevention, remedy and redress.

This code of conduct expresses mey's commitment to proper business ethics, human rights, standards of labour and the preservation of the environment. mey's value creation takes place predominantly in Germany. State-of-the-art production methods, the efficient use of resources and short transport routes are environmentally friendly.

mey sees itself as part of the society in which it operates. mey contributes to their well-being, promotion and sustainable development through doing business. The mey Group considers the direct and indirect effects of business activities on society and the environment and strives to bring them into an appropriate balance of interests in economic, social and environmental terms. mey respects and accepts the diverse legal, social, cultural and backgrounds of the countries into which the value chain extends and recognizes their structures, customs and traditions. Insofar as these conflicts with the principles laid down here, mey will enter into dialogue with its business partners and work towards understanding and acceptance. Tolerance, respect and trust are among the basic principles in daily dealings with each other. Problems need to be addressed openly and solutions are sought together. Only in this way, we can create a working atmosphere characterised by openness and fairness. Integrity in dealing with our employees, business partners and the public is a key success factor. Furthermore, mey expects its business partners to protect all data and business secrets handed to them. This Code of Conduct must be accompanied and supported by role models.

Executives, leading by example, must ensure that employees understand and live the Code of Conduct with the behavioural requirements described therein. Therefore, this Code of Conduct is an indispensable part of all business relationships and activities related to mey products. It applies to all companies of the mey Group as well as to all direct and indirect business partners. Our business partners are required to comply with the principles of this Code of Conduct. Given repeated breaches, mey reserves the right to terminate the business relationship.



Florian Mey, Managing Partner

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What drives us? Mainly our aspiration. We are only happy when everything is perfect. And then we simply go one better."



1. COMPLIANCE WITH LEGISLATION

The mey Group complies with the law and order of the respective countries in which it operates. In particular, in countries with weak state structures, mey ensures that the principles set out in the Code of Conduct are adhered to. Compliance with the "Code of Conduct" is mandatory for the mey Group and all business partners.

2. HUMAN RIGHTS AND LABOUR STANDARDS

For each one of us, it is understood that the human rights must be respected. Above all, this includes the protection of the personal freedom, dignity and privacy of each individual. mey takes its commitment to a fair and safe working environment very seriously and will not tolerate violations of local legislation and internationally recognized human rights.

2.1 DISCRIMINATION IN EMPLOYMENT

Recruitment, wage policy, admittance to training programs, employee promotion policy, policies of employment termination, retirement and any other aspect of the employment relationship must be based on the principle of equal opportunities, regardless of race, colour, sex, religion, political affiliation, union membership, nationality, social origin, sexual orientation, deficiencies or handicaps. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment, as well as verbal abuse or other forms of intimidation are not permissible for mey (ILO Conventions 100,111,143,158 and 159).

2.2 FORCED LABOUR

Workers must not be subjected to forced labour, including debt bondage or prison labour (ILO Conventions 29 and 105). Employees must be free to choose means of employment. Moreover, employees must be allowed to move freely. Obligations to employees under labour or social security laws and regulations arising from the regular emp-loyment relationship shall not be avoided through the use of labour-only contracting arrangements, or through ap-prenticeship schemes where there is no real intent to impart skills or provide regular employment.

2.3 CHILD LABOUR

mey condemns all forms of child labour. Therefore, mey and all its suppliers must adhere to strict standards regarding the employment of minors. The age for admission to employment shall not be less than the age of completion of compulsory schooling and, in any case, not less than 15 years (ILO Convention 138). "Children, in the age of 15-18 years old, shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety or morals and/or is performed during the night" (ILO Convention 182).



2.4 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

The right of all workers to form and join trade unions and bargain collectively shall be recognized (ILO Conventions 87 and 98). If national laws or rules restrict the right of association and the right to collective bargaining, employers must guarantee at least one free and independent association of employees as an alternative. Workers' representatives shall not be the subject of discrimination and shall have access to all workplaces necessary to carry out their representative functions (ILO Convention 135 and Recommendation 143).

2.5 WORKING HOURS

Hours of work shall comply with applicable laws and industry standards. In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period and the right to resting breaks in every working day. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate. In exceptional cases defined by the ILO, the limit of working hours prescribed above may be exceeded, in which case overtime is permitted (ILO Convention 1).

2.6 FAIR PAYMENT

Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and always be sufficient to meet basic needs of workers and their families and to provide some discretionary income (ILO Conventions 26 and 131). Deductions from wages for disciplinary measures shall not be permitted nor shall any deductions from wages not provided for by national law be permitted. Deductions shall never constitute an amount that will lead the employee to receive less than the minimum wage. Employees shall be adequately and clearly informed about the specifications of their wages including wage rates and pay period. Wages are to be paid in a timely manner, regularly and fully in a legal tender.

2.7 SAFE AND HEALTHY WORKING CONDITIONS

A safe and hygienic working environment shall be provided, and best occupational health and safety practice shall be promoted, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Appropriate attention shall be paid to occupational hazards specific to this branch of the industry and assure that a safe and hygienic work environment is provided for. Effective regulations shall be implemented to prevent accidents and minimize health risks as much as possible (following ILO Convention 155).

2.8 CORRUPTION

Corruption and violations of antitrust law are not tolerated. Our partners are prohibited from offering, making, demanding or accepting bribes, including kickbacks.



2.9 COMMUNICATION

All information is subject to the criteria of truthfulness and transparency. In particular, records and reports must be complete, on an accrual basis, accurate and understandable. All employees are called upon to ensure a smooth and rapid exchange of information within the company. Knowledge relevant to the work to be done must not be falsified, selectively passed on or withheld from other areas, as long as this does not conflict with priority interests (e.g. secrecy and secrecy obligations or data protection provisions). Business partners shall not pass on confidential information such as inventions, new products or planned collections, as well as current sales figures without authorization. In return, the trade secrets of our competitors, business partners and customers shall be treated with respect. The secure storage of company information must be ensured at all times, including through technical aids. Any violation must be reported immediately to the responsible supervisor. The duty of confidentiality also applies after termination of the employment relationship or the business relationship.

3. ENVIRONMENTAL PROTECTION

Protecting nature and the environment is a fundamental part of doing business. The value creation takes place predominantly in Germany, where state-of-the-art production methods ensure efficient use of resources and short transport routes help to protect the environment. The mey Group and any business partners must comply with the applicable environmental standards. They are also required to work continuously to prevent and reduce environmental pollution. Applicable procedures and standards for waste management, handling and disposal of chemicals and other hazardous substances as well as emissions and wastewater treatment shall be complied with. The protection and preservation of the natural foundations of life is to be taken into special account. Environmentally and socially responsible production are core values of mey and must be supported.

4. SUBCONTRACTORS

Subcontractors used by our business partners for the provision of services must be approved in advance by mey and comply with the standards of this Code of Conduct. Our partners are obliged to inform subcontractors about the content of the Code of Conduct and to demand the requirements and standards listed here.



COMPLAINTS

Complaints, indications, misuse or violations of this "Code of Conduct" may be reported to the mey Group at <u>csr@mey.com</u> at any time. The message can also be made in anonymous form. The displaying person is requested to report only such complaints and information about which they are in good faith about the accuracy of the corresponding message. All business partners must guarantee to refrain from any disadvantageous measures or disciplinary measures against the notifying person.

Establishment of Grievance Mechanisms:

It is our aspiration to be vigilant about any sort of human rights violation, in this way we can take appropriate countermeasures. We therefore established different complaint procedures for employees and external parties, to inform us of possible or actual violations of human rights. This is how we can reduce potential negative impact of our business activity early on.

CONTACT PERSON

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The undersigned hereby undertakes to comply with this Code of Conduct towards the mey Group.

Stamp Signature