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Social Compliance Policy

Policy Statement

Heinrich Klenk GmbH & Co.KG is aware that the food industry is about much more than just food. It is about delivery performance, business, social, and environmental responsibility, innovation through developing new products and production methods and about providing quality products to our customers. Our main goal is to develop and maintain a financially sound and prosperous business with respect towards human, nature and environment. **Heinrich Klenk GmbH & Co.KG** assumes the responsibility of the areas over which we have control. This means that we have a responsibility toward the local communities and immediate environment in which we operate, as well as towards our employees, customers, suppliers, and society.

Heinrich Klenk GmbH & Co.KG we believe that our success is built on a foundation of personal and professional integrity. **Heinrich Klenk GmbH & Co.KG** understands the challenge of ensuring high social, ethical, and environmental standards within our business and throughout our supply chain and is committed to working close together with our suppliers to make sure that these standards are subject to continuous improvement. To achieve this,


Heinrich Klenk GmbH & Co.KG has developed this social compliance policy. This policy defines **Heinrich Klenk GmbH & Co.KG** and its minimum standards along with basic principles we expect from all our Suppliers and (sub) Contractors. **Heinrich Klenk GmbH & Co.KG** is committed to ensure that the standards, outlined in this policy are effectively implemented, measured, and monitored throughout our supply chain and we require the support of our suppliers to achieve this goal.

Scope

Heinrich Klenk GmbH & Co.KG management defines this policy as relevant to the organization itself, its (sub) contractors, suppliers and other parties engaged throughout our supply chain.

Compliance

Business partners (included but, not limited to agents, vendors, manufacturers, factories, suppliers, and (sub) contractors) must comply fully with all (local) legal requirements relevant to the conduct of their businesses. This policy communicates our values and expectations and emphasizes the importance of responsible workplace policies and practices, which generally comply, at a minimum, with applicable occupational Health and Safety, environmental and labor laws, and regulations. The standards outlined reflect the values we uphold in our own policies, and we expect our suppliers to follow these

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standards and requirements. Suppliers will also be held accountable for the operations of their subsidiaries, affiliates and subcontractors and ensure that they are complying.

No Forced Labor, Human Trafficking, or Slavery

Employment must be voluntary, and respect the right of employees to decide to work or not. Suppliers must not use forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise, nor shall engage in any form of human trafficking and/or slavery. Also, employees are free to leave their employer after reasonable notice.

No Child Labor

Heinrich Klenk GmbH & Co.KG does not engage in or support the use of child labor. Suppliers must not recruit child labor (Child Labor being defined under ILO Conventions as workers under the age of 15, or 14 in certain developing countries). No hazardous work may be carried out by anyone under the age of 18. Suppliers must maintain formal documentation that verifies the age of each worker. If children are found to be working in directly for the supplier, the latter shall seek a sensitive and satisfactory solution that puts the best interest for the child.

Children and young persons under 18 shall not be employed at night or in dangerous conditions.

Freedom of Association


The freedom of association and the right to collective bargaining is respected. Suppliers adopt an open attitude towards the activities of both trade unions and worker organizations. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

No Discrimination

Employees must not be subject to discrimination in employment, including with respect to hiring, salary, benefits, advancement, discipline, termination, or retirement, based on gender, race, religious or personal beliefs, age (other than normal and legally allowed hiring or retirement limitations), disability, sexual orientation, maternity or marital status, nationality, political opinion, union participation, social or ethnic origin or membership of any legal organization. Employment decisions must be made solely based on knowledge, skill, efficiency, and ability to do the job and meet its requirements.

No Harassment or Abuse

Every employee must be treated with respect and dignity. No employee may be the subject to any physical, sexual, psychological, or verbal harassment or abuse including the use of physical punishment. All disciplinary actions must be recorded and be fair, proportionate, and fully compliant with local laws.

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Working Conditions

Suppliers shall provide a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring during work, by minimizing, as far as is reasonably practicable, the causes of hazards inherent to the working environment. Applicable occupational Health and Safety regulations will be adhered to and complied with, and a working environment which is safe and conducive to good health shall be provided.

Employees shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned employees. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Employee accommodations, where provided, shall be clean, safe and meet the basic needs of the employees. Responsibility for health and safety shall be assigned to a senior management representative.

Fair Wages

Wages and benefits paid for a standard working week meet, at minimum, national legal standards, or industry benchmark standards. All employees shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Wages shall be paid directly to the employees, at the agreed intervals in full. Overtime must be paid at an enhanced rate, at a minimum compliant with national legislation.

Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Working Hours


Working hours shall comply with national laws and benchmark industry standards, whichever affords greatest protection. Comply with applicable hour and benefit laws related to the industry and/or local labor market.

Regular Employment is Provided

To every extent possible, the performed work must be based on recognized employment relationship established through national law and practice. Migrant, contract, part-time and home- workers must receive the same rights, benefits and opportunities as other workers performing similar activities.

Protect the environment

Suppliers shall conduct their businesses in compliance with all applicable environmental laws, rules, and regulations. Waste is minimized and items recycled wherever this is practicable. Effective controls of waste in respect to ground, air, and water pollution are

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adopted. In the case of hazardous materials, emergency response plans are in place. In respect of packaging and paper, undue and unnecessary use of materials is avoided, and recycled materials are used whenever appropriate. In respect of energy use, all production and delivery processes, including the use of heating, ventilation, lighting, IT systems and transportation, are based on the need to maximize efficient energy use and to minimize harmful emissions.

Business integrity

Suppliers shall strive to provide a workplace free of bribery and corruption by complying with all applicable law relating to bribery, money laundering and/or corruption as well as prohibiting the exchange of money or anything else of value to or from anyone, including government officials, to influence actions or to obtain an improper advantage.

Heinrich Klenk GmbH & Co.KG Requires its Suppliers to:

To comply with this Policy and all applicable law, in the countries in which they operate, and to conduct regular internal assessments to assure their compliance with this Social Compliance Policy. Where standards differ, the standard which offers the greatest degree of protection to employees shall apply.


Allocate the relevant recourses for full implementation of the Social Compliance Policy.

- Communicate the Policy to all employees, suppliers, sub-contractors, home workers, temporary, and contract workers engaged in the supply chain.
Heinrich Klenk GmbH & Co.KG (will recognize suppliers' own Policy and standards where they are comparable with our own).
- Communicate openly and honestly with **Heinrich Klenk GmbH & Co.KG** and all its subsidiaries and allow access to documentation and sites as required to determine performance against this Policy.

Continuous Improvement

Heinrich Klenk GmbH & Co.KG commits to periodically review this policy in order to continually improve, taking into consideration changes in legislation, and any other requirements to which **Heinrich Klenk GmbH & Co.KG** subscribes and in order to ensure the adequacy, suitability and continuing effectiveness of the policy.

Specifically, the policy will be routinely reviewed at the **Heinrich Klenk GmbH & Co.KG** management review meetings and will be integrated into our quality management system.

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Queries on Social Compliance

If you have any questions or would like to discuss our supplier social responsibility requirements in more details, please contact Robert Parzinger at:

robert.parzinger@klenk-herblin.de

The section below is to be signed by the supplier/contractor and a copy of this page is returned to:

Heinrich Klenk GmbH & Co.KG
Aschenhof 35
D – 97525 Schwebheim

I confirm that _____ (insert your Company name)

understands, and is prepared to work towards full compliance with the **Heinrich Klenk GmbH & Co.KG** Social Compliance Policy.

Robert Parzinger
(Pharmacist/ QP/QS Manager)
Heinrich Klenk GmbH & Co.KG
Aschenhof 35
D – 97525 Schwebheim

Tel.: 0049 9723 60941 Fax.: 0049 9723 609 88 41 robert.parzinger@klenk-herblin.de