

# **Verhaltenskodex**

# **Code of Conduct**

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This Code of Conduct sets forth the values and principles that Eurasia Statinvest GmbH, as well as its affiliated subsidiaries: STYLEX Schreibwaren GmbH, Carstensen Import-Export Handelsgesellschaft mbH and Felidae (Europe) GmbH; their business partners and their supply and value creation chains commit to.

The Code of Conduct is deemed a binding component of the Company's procurement contracts and is based on the Organisation for Economic Cooperation and Development's (OECD) Guidelines for Multinational Enterprises, the United Nations' (UN) Guiding Principles on Business and Human Rights, the conventions and recommendations of the International Labour Organisation (ILO) on Work and Social Standards, and the amfori BSCI Code of Conduct.

This Code of Conduct bindingly lays down the minimum requirements that every employee of the Company, its business partners, and their direct or indirect partners, are expected to fulfill.

It also serves as a basis and guideline for addressing ethical and legal issues that arise in the context of daily business.

Eurasia Statinvest GmbH, as well as its affiliated subsidiaries: STYLEX Schreibwaren GmbH, Carstensen Import-Export Handelsgesellschaft mbH and Felidae (Europe) GmbH, expect their business partners to also monitor and improve the social and ecological principles and performance along their supply chains. Compliance with the minimum requirements also includes the obligation not to pass on orders to subcontractors.

The following principles must be implemented along the supply and value creation chains of Eurasia Statinvest GmbH's business partners, as well as by the business partners of Eurasia Statinvest GmbH's subsidiaries: STYLEX Schreibwaren GmbH, Carstensen Import-Export Handelsgesellschaft mbH and Felidae (Europe) GmbH:

## **1. Management practice**

The management of all our business partners must ensure the implementation of the minimum social standards defined in this Code of Conduct and must establish appropriate management functions and practices.

Employees must be made aware of the contents of said social standards as well as any applicable national and international legislation.

Appropriate documentation must be made available.

## **2. Freedom of assembly and collective bargaining**

Our business partners respect their employees' right to found or join employee organisations and trade unions. The same applies to employees' right to collective bargaining.

Should national law ban such activities, business partners must offer their employees suitable alternatives (e.g. electing their own representation).

## **3. Discrimination**

Human dignity, respect and equal treatment are inalienable employee rights, (also valid for potentially vulnerable groups, such as women, ethnic and / or religious minorities, migrants, youth) irrespective of an employee's origins, gender, age, religion, ethnicity, social background, disability, caste, membership in employee organisations (including trade unions), political views, sexual orientation, or any other personal situation.

Business partners are obliged to create an environment that is free of discrimination, exclusion or the favouring of individuals. Employees must never be subjected to harassment or disciplinary action on the above-mentioned grounds.

Any form of verbal, sexual, physical or mental abuse or intimidation is strictly prohibited!

## **4. Fair pay**

Business partners must undertake to pay at least the statutory or industry standard minimum wage. Business partners must ensure that the wages they pay are sufficient to cover the cost of living and must provide statutory social benefits. Wages must be paid in good time, in full, on a regular basis, in legal tender, and including overtime pay.

## 5. Working hours

Working hours must comply with the national statutory standard or industry standard.

Workers may not work more than 48 hours per week on a regular basis, with the exceptions stipulated by the ILO. Overtime should be an exception and voluntary. Workers must have the right to take breaks on every working day and must have at least one day of rest per week.

## 6. Occupational health and safety

Business partners are under obligation to ensure a safe and hygienic work environment and adhere to applicable occupational health and safety regulations or to international standards, should national legislation be insufficient or poorly implemented. Appropriate management practices and procedures must be implemented to prevent accidents or injuries.

## 7. Child labour

Child labour is not permissible and workers below the statutory age, which must not be younger than 15 years, is prohibited (Minimum Age Convention 138). The exceptional regulations approved by the ILO apply.

## 8. Forced labour

Any form of activity or service to which a person is forced against their will, be it under the threat of punishment or another form of great discomfort, or is forced to perform without payment, or is forced to perform when the employee's freedom of movement is limited (e.g., prison work), is prohibited.

## 9. Environment protection

Business partners must ensure that their supply and value creation chains comply with all national laws and regulations and that their ecological footprint is continuously reduced. Moreover, certain requirements applicable to supply chains (obtaining certificates and seals of approval) must be complied with in business operations.

## 10. Management of complaints

Through our membership in amfori BSCI, we contribute to establishing a collective complaint mechanism. This will be available to all BSCI members in future.

As the development and implementation of such a system is a process that we only have limited influence on, we have created interim solutions for the meantime.

A complaint form is available from our home page, which can be used to submit complaints.

Additionally, we provide our employees in the procurement markets with business cards containing the appropriate contact data for complaints ([csr\\_beschwerde@eurasia-group.org](mailto:csr_beschwerde@eurasia-group.org), [csr\\_grievance@eurasia-group.org](mailto:csr_grievance@eurasia-group.org)) for distribution at local production facilities.

## 11. Business ethics

Our business partners must not be involved in any form of corruption, extortion, bribery, or misappropriation.

We expect our business to have accurate information on their business activities, structure, and performance, and to make this information available in accordance with the applicable statutory regulations and industry benchmarking practices.

Our business partners neither partake in any form of falsification of information nor in any act of fraud in the supply chain.

## Commitment to compliance with the Code of Conduct

We, Eurasia Statinvest GmbH, as well as our affiliated subsidiaries: STYLEX Schreibwaren GmbH, Carstensen Import-Export Handelsgesellschaft mbH and Felidae (Europe) GmbH, confirm compliance with and implementation of the aforementioned Code of Conduct.



Sönke Carstensen  
Director



Martin Pancke  
Director