



CARSTENSEN
TRADE SINCE 1991

Code of Conduct

Version 09.25/18.03_EN



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This Code of Conduct defines the values and principles that Carstensen Import-Export Handelsgesellschaft mbH, its business partners, and all actors along the supply and value chains commit to uphold.

This Code of Conduct is an integral part of purchasing agreements and is based on the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD), the United Nations (UN) Guiding Principles on Business and Human Rights, the conventions and recommendations of the International Labour Organization (ILO) on labor and social standards, as well as industry initiatives such as amfori BSCI, ICTI, and SMETA, including their related requirements and obligations.

It sets out binding minimum standards that must be observed and implemented by all employees of the company, its business partners, and their direct and indirect partners. In addition, it serves as a guide for addressing ethical and legal challenges in day-to-day business operations.

Carstensen Import-Export Handelsgesellschaft mbH expects its business partners to continuously monitor and improve social and environmental standards within their supply chains.

The delegation of orders to subcontractors is only permitted if they meet the same standards. For subcontracted production processes, appropriate review and documentation, including approval from Carstensen Import-Export Handelsgesellschaft mbH, are required.

Principles of the Code of Conduct

1. Management Practices

The management of all business partners is obligated to ensure compliance with the minimum social standards defined herein and to establish appropriate management systems or practices. Employees must be informed about the applicable social standards as well as national and international legal requirements. Proper documentation must be maintained.

2. Freedom of Association and Collective Bargaining

Our business partners respect the right of employees to join or form trade unions or employee associations. The right to collective bargaining must be recognized. If national law restricts such activities, alternative means of employee representation must be provided (e.g., through elected employee representatives).

3. Non-Discrimination

Dignity, respect, and equal treatment are essential principles for all employees, including potentially vulnerable groups such as women, ethnic and religious minorities, migrants, and young people. Discrimination based on origin, gender, age, religion, social background, disability, political beliefs, sexual orientation, or other personal characteristics is not permitted. Business partners must ensure a work environment free from discrimination, harassment, and intimidation.

4. Fair Remuneration

Business partners are obligated to pay at least the statutory or industry-specific minimum wage. Wages must be sufficient to meet basic living needs and must include all legally mandated social benefits. Compensation must be paid in full, on time, and in legal currency, including payment for any overtime hours.

5. Working Hours

Regular working hours must not exceed 48 hours per week, except as permitted by exceptions defined by the ILO. Overtime must be voluntary and should remain the exception. Employees are entitled to daily rest periods and at least one day off per week.

6. Occupational Health and Safety

Our business partners are obligated to ensure a safe and hygienic working environment. If national regulations are insufficient or poorly enforced, international standards must be applied. Appropriate management systems must be implemented to prevent workplace accidents and occupational illnesses.

7. Child Labour

Child labour is prohibited and not permitted below the legal minimum age, which must not be under 15 years in accordance with ILO Convention 138. Exceptions are only allowed if they comply with provisions recognized by the ILO.

8. Forced Labour

Any form of forced or compulsory labour is strictly prohibited. Employees must not be coerced to work through threats of punishment or other repressive measures. It is also forbidden to unduly restrict their freedom of movement. Work performed under detention conditions, including prison labour, is not accepted.

Furthermore, Carstensen Import-Export Handelsgesellschaft mbH is committed to ensuring that no raw materials or components originating from forced labour are used within its supply chains. Our business partners are expected to take appropriate measures to verify the origin of their materials and to ensure—through relevant documentation or certifications—that they do not stem from forced labour practices.



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9. Environmental Protection

Business partners are obligated to comply with legal environmental regulations and to continuously improve their environmental performance.

They must take measures to minimize environmental impact and demonstrate sustainable standards and claims through certifications or eco-labels.

Carstensen Import-Export Handelsgesellschaft mbH is also committed to implementing the Minamata Convention on Mercury and taking appropriate actions to reduce hazardous substances throughout the supply chain.

Our business partners are required to use resources such as water, energy, and raw materials efficiently and to implement measures aimed at reducing consumption. This includes the use of environmentally friendly production methods, increasing the use of sustainable materials, promoting circular economy principles, and minimizing packaging materials.

Hazardous chemicals must be stored, transported, and disposed of safely.

Appropriate measures to prevent environmental pollution must be implemented, including safe waste management in accordance with international and national regulations (e.g. REACH Regulation).

Requests for CO₂ emissions data must be fulfilled by business partners, and efforts to reduce greenhouse gas emissions must be actively pursued.

These efforts include improving energy efficiency, using renewable energy, and promoting climate-friendly transportation and logistics solutions.

10. Compliance with legal and regulatory requirements

Our business partners are obligated to comply with all applicable national and international laws as well as EU regulations in the course of their business activities. This includes, in particular, the provisions of the EU Timber Regulation (EUTR) and the EU Deforestation Regulation (EUDR), which govern the traceability and legality of timber products and other high-risk raw materials.

Business partners must ensure that their products do not contain materials sourced from illegal logging or environmentally harmful origins. All required due diligence obligations, including documentation of origin, must be fulfilled and disclosed to Carstensen Import-Export Handelsgesellschaft mbH.

11. Complaint Management

Carstensen Import-Export Handelsgesellschaft mbH has established a comprehensive complaint management system to ensure that violations of our Code of Conduct, as well as any ethical or legal misconduct, can be reported and appropriately addressed.

Complaints can be submitted anonymously or with contact details through various channels:

- **mail:** csr_grievance@carstensen.de
- **phone:** +49 4106 9777 578
- **web:** <https://www.eurasia-statinvest.com/en/social-responsibility/>

To ensure unrestricted accessibility, our business partners are obligated to make our complaint channels openly and freely accessible. Furthermore, the use of these channels must not be sanctioned or result in any negative consequences for the whistleblowers.

In all production facilities manufacturing goods for us, the complaint poster provided by us must be displayed prominently at all production levels. This ensures that all employees are fully informed about their complaint options and can exercise their rights without restriction.

Our complaint handling process is based on the provisions of the German Whistleblower Protection Act (HinSchG).



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12. Business Ethics

Our business partners are required to refrain from corruption, bribery, extortion, and embezzlement.

They must provide complete and truthful information about their business activities, corporate structure, and capabilities. Any falsification or manipulation of information within the supply chain is strictly prohibited.

Business partners must implement appropriate measures to protect sensitive and confidential information. This includes technical and organizational measures to ensure data security and compliance with applicable data protection regulations.

13. Handling of Home-Based, Manual, and Migrant Workers

Our business partners commit to transparently documenting the use of home-based and manual labor in accordance with ILO Convention 177 and to ensuring that all applicable social and labor standards are upheld. Home-based workers must receive at least the legal or living minimum wage, and their working conditions must not pose any health risks. Clear and comprehensible employment contracts must be provided in a language the workers understand. Compliance with these requirements must be regularly reviewed and documented.

Migrant workers must also be protected from exploitation. Employers may not retain passports or identity documents, and recruitment must be conducted fairly and without unlawful placement fees. If accommodations are provided, they must meet international health and safety standards. Discrimination of any kind is prohibited, and all employees—regardless of origin or immigration status—must enjoy equal rights. Our business partners are required to consistently implement these standards.

14. Scope and Updates

This Code of Conduct applies to all business partners, including production facilities, raw material suppliers, and service providers such as logistics companies.

It is regularly updated to reflect new legal requirements within the EU, particularly with regard to human rights and environmental due diligence obligations.



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Management Commitment to Compliance with the Code of Conduct

We, the management of Carstensen Import-Export Handelsgesellschaft mbH, hereby confirm our compliance with and active implementation of the company-wide applicable Code of Conduct.

We explicitly acknowledge the requirements set forth therein and commit to fully and continuously implementing them.

We are aware that violations of the principles of this Code of Conduct can have serious consequences for both our company and our business partners.

To ensure its implementation, we have entrusted the internal Corporate Responsibility Team (CR Team) with the responsibility of embedding the requirements of the Code of Conduct across all relevant areas and continuously developing them further.

This includes the systematic integration into our business processes as well as the monitoring of compliance through appropriate measures.

As part of our due diligence obligations, we are committed to consistently upholding labor, environmental, and safety standards throughout the entire supply chain.

In addition, we ensure that our employees and all business partners are regularly informed about the contents of the Code of Conduct and receive appropriate training as needed.

These training sessions specifically address topics such as ethical behavior, environmental protection, occupational safety, and the responsible use of resources.

This commitment is binding for the entire duration of our business operations.

Signed for and on behalf of Carstensen Import-Export Handelsgesellschaft mbH:

Martin Pancke
Managing Director

Marco Wöbke
Managing Director

Steve Carstensen
Managing Director