



MEIKO Code of Conduct

CONTENTS

1. Foreword by our CEO	4
2. The MEIKO Code of Conduct and what it means	6
Our Code of Conduct guides us	7
We ask questions and report concerns	8
3. The MEIKO values	10
4. The MEIKO mission	12
5. MEIKO's guidelines	14
Respectful behaviour	16
Fostering talent and diversity	18
A safe workplace	20
Protecting data	22
Excellent product quality and safety	24
Antitrust legislation, fair competition and honest sales practices	26
Corporate social responsibility	30
Bribery and corruption	32
International trade law	34
Commitment to the environment	36
Avoiding conflicts of interest	40
Considerate communication	42
Protecting material assets	44
Documentation and records	46
Responsible suppliers	48

Morally and ethically justified behaviour is each individual's contribution to our future.
The future of society and the future of MEIKO as a company.



Dr.-Ing. Thomas Peukert
CEO MEIKO Group

1. Foreword by our CEO

Dear employees
and business partners,

MEIKO was founded in 1927 by engineers Oskar Meier and Franz Konrad in Offenburg, Germany. In accordance with the wishes of the owner, Oskar Meier, and his wife, Rosel Meier, a neutral organisation should be created to manage the company – going above and beyond their personal interests and fates. For this reason, the **Oskar and Rosel Meier Foundation** was created in 1983 and today, the Foundation owns the MEIKO Group. The foundation's primary purpose is to maintain and further develop the MEIKO Group.

We, the Executive Board and the employees of the MEIKO Group, view the purpose of the Foundation as our job and the motivation behind our day-to-day work. Over the several decades since the Foundation was established, we have consistently been able to further develop MEIKO. That process centres around our values, just as they impact our interactions – both within the Group and externally – to be respectful, reliable, innovative, sustainable, quality-oriented and agile. We do all this with the aim of continuously refining the concept inherited from the company's founders: that our products should contribute to creating a cleaner, more hygienic, and therefore safer environment.

We want our products and solutions to contribute to creating a future worth living in the modern world. That will only work if our businesses are managed safely and responsibly and if we can unreservedly trust one another.

The following Code of Conduct binds us all and contains our company values and guidance for behaviour to help us make good, responsible decisions even in tricky situations.

If you find yourself uncertain in an unclear or critical situation, ask us! You can ask your contact person or your line manager.

And perhaps your gut feeling will give you a good idea! The **MEIKO Code of Conduct** provides guidance for proper actions and behaviours.

Each one of us can make a significant contribution to MEIKO being a company where we feel at home and that our stakeholders can trust, simply by behaving in a proper manner.

Thank you for supporting us in this.

Dr.-Ing. Thomas Peukert
CEO MEIKO Group

2. The MEIKO Code of Conduct and what it means



We are guided by our Code of Conduct in our day-to-day behaviour

- Our **Code of Conduct** applies to all employees, executives and managers in all MEIKO Group companies.
- It also applies to external suppliers and service providers.
- Our **Code of Conduct** is our guideline for how to act. In the event that applicable legislation is stricter than the rules of our **Code of Conduct**, we will follow the stricter rules.
- Contraventions of our **Code of Conduct**, our company guidelines, or applicable legislation or requirements can result in disciplinary measures, up to and including termination of the working relationship and enforcement of criminal or civil claims.

Whenever we need to make a decision, we always ask ourselves the following basic questions:

- ***Does this contravene an applicable law?***
- ***Does it violate the rules in the Code of Conduct?***
- ***Does it contradict our company values, mission or strategy?***

Are you unsure?

If so, please consider the decision together with your line manager and/or seek advice.

Contact: [**compliance@meiko-global.com**](mailto:compliance@meiko-global.com)

We ask questions and report concerns

- If there is a possible violation of the **Code of Conduct**, guidelines or legislation, we are obliged to report this or seek help in assessing the event.
- MEIKO provides the following anonymous forms of contact for this:
 - > **Compliance advice hub**
 - > **Your line manager**
 - > **Chief HR Officer**
 - > **Head of Legal, MEIKO Maschinenbau GmbH & Co. KG**
 - > **The BKMS reporting system**

If the relevant MEIKO company has a works council, they are also required to ensure that the **Code of Conduct** is adhered to. You can also approach them for advice if you are unsure of how to act.

MEIKO does not tolerate retribution against individuals who report a suspicion of improper behaviour in good faith or otherwise assist in an investigation. MEIKO treats any information received as confidential and will not pass on any details about the person who reported the potential contravention. The company will protect whistleblowers according to the applicable laws, such as the Whistleblower Protection Act in Germany.

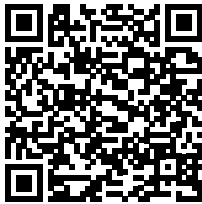
Improper use of the whistleblower system as a result of knowingly submitting false reports constitutes a violation of the law and will be punished.



The BKMS reporting system

You can report contraventions of the **Code of Conduct** to the Compliance Team using the BKMS reporting system. The protected inbox means that you can – if you prefer – communicate anonymously with the Compliance Team and receive a response.

The anonymity function of the BKMS reporting system is certified by an independent body.



www.meiko.com/en/bkms

3. The MEIKO values



Long-term direction based on our values

MEIKO thinks in generations, not in business quarters. We insist on innovation and quality in our technical solutions and on respectful, reliable interactions with one another. The MEIKO Group thinks and acts sustainably, so that our planet Earth will be fit for the generations to come.





4. The MEIKO mission

Keeping an eye on the market

MEIKO has always responded to the needs of the market. Our customers' expectations are at the centre of all of our designs and considerations. Their requirements are constantly changing and therefore we are constantly adapting. We regularly take stock, getting a clearer view of the market so that we can be successful locally and internationally, both now and into the future. Our values, mission and strategy are the foundation for all of this.

The MEIKO mission

Customers

We deliver outstanding customer value in cleanliness, hygiene and safety.

Solutions

We provide integrated solutions that result in efficient processes and greater profitability.

Quality

We create products that combine quality, innovation and sustainability.

Efficiency

We maximise our productivity and create customer and internal processes that work efficiently.

Personnel

We employ skilled, dedicated professionals who receive ongoing training and development opportunities.

Future

We plan for the long term and help support a healthy society in the best traditions of a profitable foundation-owned company.

5. MEIKO's guidelines



Respectful behaviour	16
Fostering talent and diversity	18
A safe workplace	20
Protecting data	22
Excellent product quality and safety	24
Antitrust legislation, fair competition and honest sales practices	26
Corporate social responsibility	30
Bribery and corruption	32
International trade law	34
Commitment to the environment	36
Avoiding conflicts of interest	40
Considerate communication	42
Protecting material assets	44
Documentation and records	46
Responsible suppliers	48



[www.meiko.com/en/
code-of-conduct](http://www.meiko.com/en/code-of-conduct)

We treat one another with respect

- Respectful interactions are a key part of the MEIKO culture. That is why **'respect'** is one of our core values.
- The following behaviour will not be tolerated:
 - verbal harassment or discrimination, such as bullying; public shaming; verbal abuse; derogatory comments and slander
 - physical violence, such as assault or intimidating behaviour
 - sexual harassment. This includes unwanted physical and verbal approaches or invitations for sexual behaviour.
- Anyone who is concerned about potential disrespectful behaviour should report this using one of the established reporting channels.

**Example**

After losing an important order, my manager shouted at my colleague and verbally abused her in front of the whole team.

Should I get involved?

Yes. You are required to report all behaviour that you believe contravenes MEIKO's guidelines: compliance@meiko-global.com

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We foster talent and diversity

- MEIKO believes in equal opportunities and is creating a work environment where openness, cultural exchange and fairness are self-evident.
- We build on talent and diversity within the company and deliberately foster inclusivity and respect in the workplace. As part of this, we value the different perspectives and contributions our employees have to offer.
- We do not discriminate based on personal characteristics like age, ethnic background, skin colour, gender, sexual orientation, identity, country of origin, religion or family status.
- These are the foundations that apply to all decisions affecting our employees, such as hiring, promotion, disciplinary measures and termination of employment.



Example

Your team is currently trying to fill a vacancy. In a departmental meeting, your manager comments that he is rejecting all applications from anyone from an immigrant background.

Is he allowed to do that as part of his responsibility for selecting staff?



No. We make hiring decisions based purely on the criteria defined for the role in question. Those are things like suitability, qualifications and skills. You are therefore required to report discriminatory behaviour via one of our reporting points: compliance@meiko-global.com



We ensure a safe workplace

- Occupational safety and protecting health are our top priority at MEIKO. We are always working to prevent accidents, injuries and occupational diseases.
- We follow all of our company internal health and safety guidelines, as well as applicable regulations and legislation.
- We provide regular training and instruction to ensure the health of all employees as far as possible.
- We are also responsible for the safety of all our visitors. This is why we advise them of the rules that apply when they enter our site.
- We carry out regular safety audits, risk assessments and spot checks to detect potential risks as early as possible.
- You should report unsafe conditions or circumstances detrimental to safety to your manager, your safety representative or your occupational safety expert and work with the relevant internal or external bodies to remove the risk.



Example

I work in sales and some customers would like to come and see the machine they have ordered with me at quality control without an appointment.

Can I take them into the production site?

No. Access to quality control and other safety-sensitive areas is only by prior arrangement and with approval from the people responsible for that area. They will arrange any necessary safety procedures in advance, remove potential risks and instruct customers on how to behave if necessary.

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We protect data and trade secrets

At MEIKO, data and information security is a key prerequisite for business success.

- Data, especially personal data, is carefully protected.
- We follow all applicable data protection legislation and guidelines and maintain relevant processes for cybersecurity.
- Our internal data protection, especially those for preventing unauthorised access, are based on up-to-date methodologies and technologies.



Example

You realise that an erroneous configuration of access rights means that you have access to customer data, despite your not needing it for your role.

Can you leave this be to make life easier for the colleagues who would have to deal with it?

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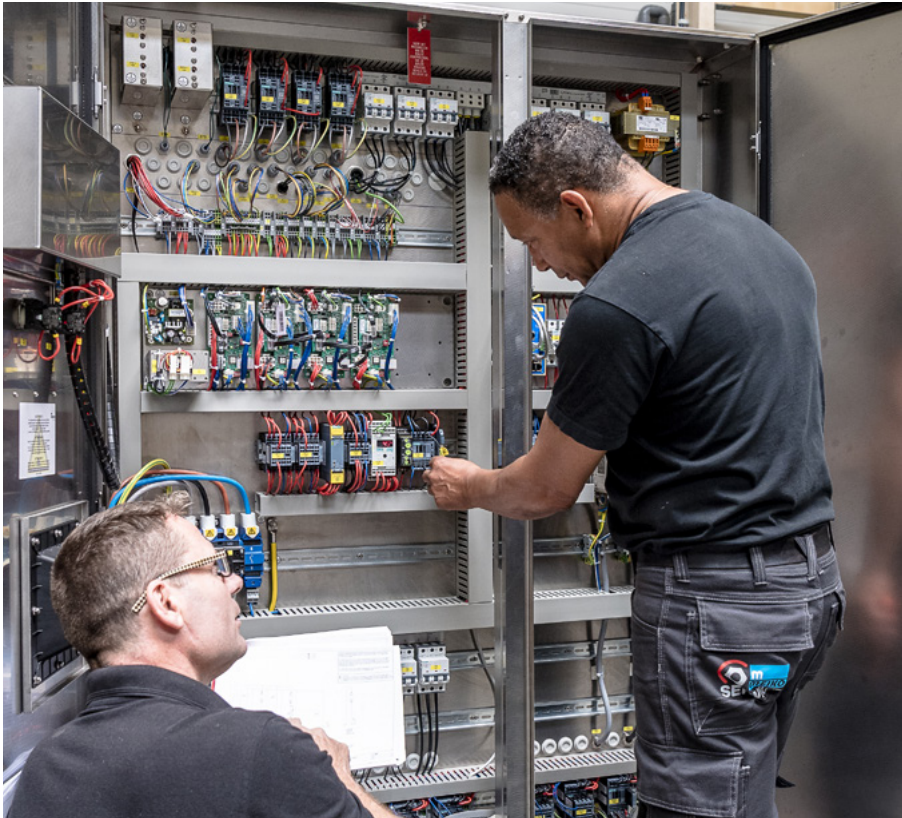
No. You are only allowed to have access to data needed for your role. You are therefore required to report the unnecessary access rights. Any unnecessary point of access could be a point of risk for a cyberattack. These must be avoided for cybersecurity reasons.

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Product quality and safety – of immense importance for MEIKO

- As a premium manufacturer, we are committed to producing products and services with flawless quality and safety records. That is why quality focus and reliability are also featured in our six core company values.
- Quality and safety are assured in every phase of product design and in all services and processes. This is especially true for each machine's overall lifecycle. Right from draft design to manufacture, storage, transport and use, through to recycling.
- Even in the early phases of development, we assess potential risks and dangers. These are discovered and remedied in the course of lab testing.
- We only launch machines and services to market when we are sure that they are safe and reliable.
Each person, within their own area of responsibility, must take care to ensure that our products, services and industry solutions are safe and irrefutably fulfil all local legal requirements for safety, approval, marketing and use. Anyone who learns of quality or safety defects, or other issues of non-compliance, in their area of responsibility or finds potential evidence of these types of issue, must investigate and report them.
- We inform our customers of how to handle our products in a manner appropriate for health and safety.
- We carry out regular audits and spot checks to maintain and improve our high product quality standards. This enables us to identify and remedy potential pain points and safety risks as quickly as possible.



Example

The market launch of our latest machine has been announced for next month. The pressure of the deadline means that your colleagues responsible for the machine want to produce and dispatch it despite having discovered a safety problem that has not yet been remedied.

Is this acceptable?

No. At MEIKO, safety is top priority. You are therefore required to inform your colleagues of your concerns and use other available reporting channels if necessary.

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We are honest in our approach to sales

- It is important to us that we are 100% reliable. We do not make any false or exaggerated claims about the characteristics of our products or services. This applies to both oral and written communication.
- We avoid confusing statements about products, services and MEIKO as a company. We evidence the characteristics of our products with the relevant documentation, in accordance with applicable laws and requirements.
- We check comparative statements with the legal department before publishing them.
- We comply with legislation in how we treat our competitors.
- We avoid any unfair or discriminating behaviour that would impact our customers, competitors or the market.



Example

You discover that the energy consumption of a new machine was accidentally measured incorrectly, producing a better result. The brochures for the product launch have already been printed.

Can the brochures be left without correction?



No. We must always ensure that the data on our products is correct and complete. We inform the relevant people so that a correction can be initiated.



Antitrust legislation and fair competition

- Antitrust legislation exists to assure free, unbiased, effective competition. Any violations of antitrust legislation could have severe consequences for MEIKO and any employees involved, e.g. fines, exclusion from public-sector tenders, compensation claims, reputational damage and criminal proceedings.
- Anti-competitive agreements include (but are not limited to) oral or written, implicit or explicit price fixing, bid rigging – in content or price – with competitors at tender or other opportunities, or the misuse of a dominant position in the marketplace.
- We never discuss or agree to the following or similar topics with competitors:
 - Prices
 - Elements of pricing
 - Conditions
 - Market
 - Customers
 - Division of territory
 - Arrangements for quotes/tenders
 - Production quantities or quotas
 - Future product developments
 - Investments
- We make our business decisions independently and never make anti-competitive agreements with competitors, customers, sales partners, trade representatives, suppliers or other third parties.

Financial integrity

As an internationally active company, MEIKO is required to provide correct, truthful reporting. We therefore follow the applicable laws, rules, standards and practices. All transactions must be properly recorded for tax purposes.

All bookkeeping and records must be complete, correct and truthful. They must be prepared on time and in accordance with the applicable rules and standards. Our financial reports communicate correct and complete information. Our bookkeeping and records include all data, review certificates and other written documents necessary for financial reporting and the fulfilment of public reporting requirements.

When applying tax legislation or in the case of conflicts between tax codes, we ensure that our taxable result is in keeping with the business and legal parameters and our business model.

We encourage social responsibility

- At MEIKO we are aware of our corporate social responsibility and provide financial, material and staffing support for selected projects as we are able.
- Our Support, Donation and Sponsorship Guidelines provide a framework for selecting the initiatives we support.



Example

The area where I work has been hit by a severe storm. Emergency housing has been set up for the victims and it urgently needs dish-washing machines. Our market organisation still has several suitable machines in storage.

Can I make them available without delay?



No. Please submit your suggestion. We have introduced a special process for these occasions. It is designed to ensure that donations are directed to where they are most needed. A specialist department at our headquarters coordinates our global charitable activities as a whole.

sponsoring@meiko-global.com



We do not tolerate bribery or corruption

- MEIKO rejects all forms of bribery and corruption. We will not tolerate any corruption anywhere in our global business activities. Corruption is also prohibited within the business activities of our external partners. Corruption includes, among other things, dishonest or illegal activity, in particular carried out by someone with decision-making authority. The most common forms of corruption are bribery, fraud and embezzlement.



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Bribery is when someone offers, promises or provides money, gifts or other benefits with the aim of being granted an unfair advantage in return. This is particularly the case for officials, i.e. people employed in a government role or those contracted by them. This includes all members of any administration. In many countries, contributions such as small gifts and restaurant invitations are an important part of doing business. These must not be provided in an inappropriate or dishonest manner that would exercise influence on the recipient. In some countries, all gifts and contributions in the context of business activities are therefore prohibited or must be made public in accordance with local law.

Small gifts and contributions must therefore only be offered and accepted in accordance with applicable law and company-internal rules. They must be correctly recorded and proportionate – this includes in terms of frequency. Under no circumstances may these activities appear dishonest or disproportionate.

Example

During negotiations, a supplier offers me a new smartphone as a retainer for our continued business relationship.

Am I allowed to accept the offer?

No. You must reject the offer as it could influence your decision making. MEIKO wishes to approach its customer and supplier relationships in a legally irreproachable manner, and we therefore do not accept any form of bribe.



Preventing money laundering

Logistics and trade businesses are at risk of having their services used for money laundering. MEIKO only fosters business relationships with serious customers and business partners, whose business activities are in line with legal requirements and whose funds originate from legitimate sources. Money laundering means disguising the source of money or other assets gained from criminal activity and moving them into legal business and financial circulation.

We follow international trade law and export control requirements

- When trading or transporting goods, providing services or otherwise transferring technical expertise, the applicable customs and foreign trade rules must be applied and obeyed. This includes rules for safety and security in the supply chain. We ensure that all applicable export control regulations are investigated and followed in our business activities. Documents for foreign trade transactions may only be signed by authorised persons who have received the relevant training.
- Documents of origin can only be signed by people who have been taught the process. If a consciously false declaration is submitted, this can lead to false reporting to the customs authorities, which can result in fines and sanctions. Please contact the customs department about this.



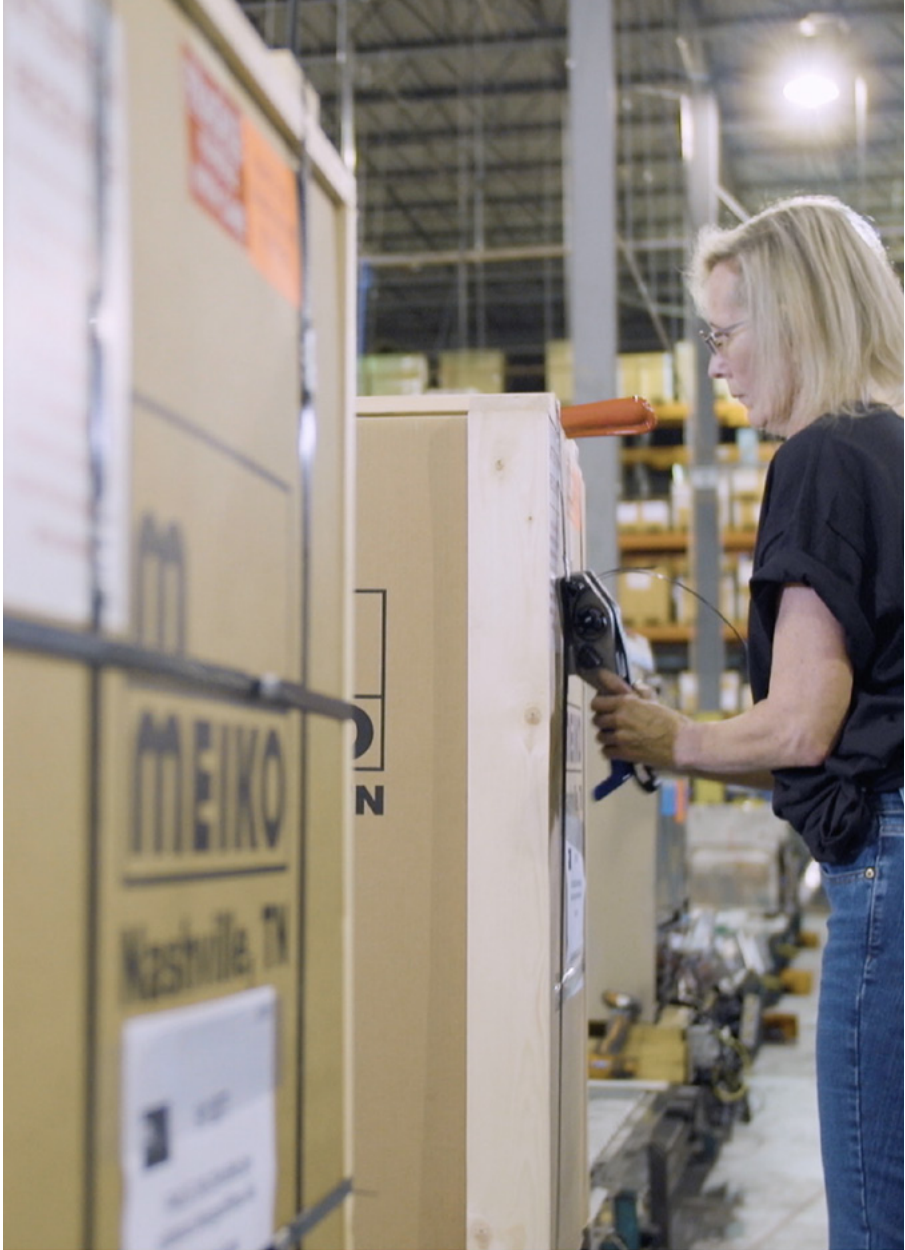
Example

Due to the possible repeated misuse of the motors found in our machines, an export ban is in place for a particular country. A customer from this country desperately wants to buy a machine. I am certain that it will only be used to clean washware there.

Can I sell the machine to this place?



No. Selling the machine would contravene a legal sanction and would have criminal and disciplinary consequences.



Sustainability and care for the environment are part of our DNA

Care for the environment

Caring for the environment is the job of business, it is our responsibility to society and a purpose of MEIKO products. Our aim is to protect the environment and to conserve resources. Within the company, some of the ways we work on caring for the environment are: improving the energy and resource efficiency of our products, and continually engaging in the environmental management of their manufacturing, servicing and disposal phases. We are committed to climate care and strive to reduce emissions in our supply chain, to decarbonise, to increase resource efficiency, and to conserve resources. We do this to meet our own expectations as well as the expectations of our customers.

- We think in generations, not in business quarters. That is why we are committed to protecting our environment – acting transparently, without greenwashing.
- We consider the environmental impact of our day-to-day operations and try to reduce activities that have a negative impact or could damage the environment.
- This does not only apply to activities directly within the business, we also seek to improve the ecological footprints of our products so that they act as positive-impact multipliers when they reach our customers, contributing to a cleaner world.
- We comply with all applicable environmental legislation and requirements, as well as making our own commitment to sustainable practices and caring for the environment.



Example

An existing leak on a production machine may contaminate the ground. It can only be repaired in three weeks as the manufacturer cannot supply the spare part until then.

Can we continue to use the machine?

No. If there is a risk of ground contamination, we must immediately take action to care for the environment (e.g. use a base drip tray or turn the machine off).

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Social responsibilities and human rights

We expect all of our employees, suppliers and business partners globally to act in accordance with

The international charter on human rights, comprising:

- > The Universal Declaration on Human Rights (UN)
- > The International Covenant on Civil and Political Rights (UN Civil Covenant)
- > The International Covenant on Economic, Social and Cultural Rights (UN Social Covenant)
- > The European Convention on Human Rights
- > The ILO (International Labour Organization) Declaration of Principles concerning Multinational Enterprises and Social Policy and the ILO Declaration on Fundamental Principles and Rights at Work (in particular with regard to the following issues: the effective abolition of child labour, the elimination of forced or compulsory labour, the elimination of discrimination, freedom of association and the right to collective bargaining) as well as fundamental freedoms
- > The OECD Guidelines for Multinational Enterprises
- > Agenda 21 on sustainable development (outcome of the foundational UN Conference on Environment and Development in Rio de Janeiro)
- > The UN Convention Against Corruption
- > The OECD Convention on Combating Bribery of Foreign Public Officials
- > The Minamata Convention on Mercury
- > The Stockholm Convention on Persistent Organic Pollutants
- > The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

Respecting human rights, obeying legislation and implementing the UN Guiding Principles on Business and Human Rights are essential in our view. In line with the key principles of the UN Global Compact,

- we support and respect the protection of internationally proclaimed human rights,
- we make sure that we are not complicit in human rights abuses,
- we recognise the fundamental requirement for workers' rights,
- and we strive to increase awareness and minimise or eliminate negative effects on our employees or people outside of the company.

We avoid conflicts of interest

Personal relationships

- We do not hire any family members or close friends to positions directly or indirectly answerable to the decision maker.
- We inform the HR department when
 - family members or other people we are personally close to are working for MEIKO or have applied to work at a MEIKO company.
 - family members or other people we are personally close to work for competitors, customers, suppliers or other business partners, or if they hold shares in any of these companies.

Other working relationships

- We inform the HR department if we would like to take on (additional) work outside of the MEIKO Group, regardless of whether the position is paid or unpaid.
- We do not accept any work or tasks that contradict our duties and responsibilities to MEIKO or which require the use of MEIKO facilities, resources or time.
- MEIKO employees do not accept any work or tasks for our competitors or their affiliated companies.
- HR management and/or the employee's line manager may refuse permission for an activity if it conflicts with the interests of the MEIKO Group. This could be the case if the role demands a high degree of time flexibility or mobility and could impede the employee's work at MEIKO.

Personal interests

- We do not use any information or knowledge acquired as part of our role at MEIKO for our personal gain.
- We do not use any resources, such as materials, machines or time at MEIKO for personal purposes, unless this is permitted by a company regulation.

Example

Alongside my full-time job, I would like to take on a part-time job with a company where I would work evenings and weekends.

Can I accept the offer immediately?

No. You must inform the HR department before accepting the job. Since working time legislation also applies across several jobs, you may be denied permission to accept the secondary employment if the total working time would exceed the legal parameters.



Considerate communication



We behave considerately in our communication

- We do not make statements in public or on social media that appear to represent the MEIKO Group's official opinion. On our private social media accounts, we are conscious to differentiate between our opinions as MEIKO employees or private individuals.
- We consider the possibility that our communication on the Internet and on social media could have an impact on MEIKO.
- We are fair in what we say – including with regard to MEIKO.
- We adhere to regulations on confidentiality and keeping trade secrets when discussing business matters outside of MEIKO.
- We forward any requests for comment regarding MEIKO that come from the media to Corporate Communications (Press & PR) and do not make any statements to the media that have not been previously agreed to.

Example

I am responsible for a new product and I have received a request for an interview from an industry magazine.

Can I complete the interview independently?

No. Please manage these kinds of requests with our Corporate Communications department (Press & PR).



We protect our material assets

- We only use company assets for legitimate company purposes.
- We take care of and manage assets, protecting them from loss, theft and misuse.
- We are aware that MEIKO can monitor the use of electronic assets and networks for protection.
- We report any signs or evidence of misuse, theft or loss to our line manager or the relevant specialist department immediately.



Example

Before finishing work for the day, I have a meeting and I would like to leave my laptop in the meeting room until the next day.

Is this allowed?



No. MEIKO assets must be protected against theft. For this reason, electronic devices such as laptops and mobile phones must be stored in locked cupboards.



We keep precise documents and records of business transactions

All documents, databases, voice memos, messages from mobile devices, computer documents, files and photos are records.

Employees are required to:

- keep these records and protect their integrity for as long as necessary,
- use the company-internal archiving system to store documents required for business, legal, financial, research and archiving purposes,
- dispose of their documents as per the company's timeline for document storage and disposal.

Employees must never destroy documents as a response to – or in anticipation of – an inspection or audit.

**Example**

I lost an invoice for an order.

Can I just write a self-prepared document?

No. All of MEIKO's business records must be correct and must never be self-prepared. In case of doubt, ask the supplier for a copy of the document.



We hold our suppliers accountable

The expectations of our **Code of Conduct** do not just apply to us – they also apply to our business partners. As part of our responsibility to create a sustainable supply chain, we expect our suppliers to ensure compliance with the human rights and environmental obligations outlined in the Supply Chain Act (LkSG) and to immediately report any negative impacts on human rights or environmental issues. Each supplier commits to implementing proportionate risk management involving an analysis of the human rights and ecological impact of their business activities.



Each supplier ensures that their activities and services are accurately and precisely documented, and published as per applicable legal requirements. Each supplier does business without bribery, corruption or any other form of deceptive business practice. They must behave in an ethically correct manner and in accordance with national laws and requirements.

This includes, among others, compliance with requirements in the following areas:

Legal framework

- Adherence to applicable rules, regulations and laws, in particular environment, labour, social, trade, and antitrust legislation.

Environmental

- Protecting employee and public health from dangers that could arise from the manufacturing or use of products.
- Fostering environmentally friendly design, manufacture, use, and disposal processes for products.
- Efficient use of resources and use of eco-friendly technology.
- A continuous reduction in emissions into the air, water and soil, along with a reduction in quantities of waste.

Responsible suppliers

Social

- Maintaining and respecting international human rights.
- Prohibition of direct and indirect child labour and forced or compulsory labour. This also applies to upstream products.
- Support for the right to association and the right to collective bargaining in accordance with the relevant locally applicable laws.
- Treating employees with respect. Prohibition of discrimination, unequal treatment, harassment and abuse.
- The provision of a whistleblowing system for employees to report concerns and illegal behaviour.
- Ensuring that the manufacturing process does not use conflict minerals or materials that directly or indirectly finance armed groups and cause human rights abuses (see Appendix 2 of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG)).

Governance

- You acknowledge your moral and ethical responsibilities and view your company's integrity as the foundation for your business relationships.
- You prohibit all forms of bribery, corruption and money laundering.
- You prohibit the giving of gifts to individuals or public servants when the aim is to influence business decisions or to commit them to act against their responsibilities in another way.
- You respect your employees' and business partners' private lives and protect confidential information and intellectual property from being misused.
- You implement an appropriate compliance management system to reinforce compliance with legislation, guidance and standards.
- You impart a proportionate level of knowledge and understanding of these directives, as well as of all further applicable laws, regulations and standards, to your executives and employees.

Example

A potential supplier cannot ensure the compliance with the applicable work safety rules regarding working hours and granting of leave.

Is a business relationship still possible?

No. MEIKO does not support companies that violate applicable legal regulations and laws.





The clean solution

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