



Code of Conduct

Version 3.0

Last updated 15.12.2023

Who we are

Bierbaum-Proenen has been an owner-managed company since 1788 that, with its BP® brand, has become one of the leading specialists for work clothing and personal protective equipment. Our aim is to make people look professional and modern in their tough everyday working lives and to make their work safer, more comfortable and easier. We develop impressive work clothing solutions with an extraordinary quality promise.

We care about **people** and the **environment**. That is why we are committed to sustainability and why it is inextricably linked to our quality standards. As a seventh-generation family business, we know what it means to build for the future. The ideals, visions and the world we leave to our children: it all rests in our own hands. As a company, we stand by our responsibility and create sustainable values for the people who work with us.

Our customers, employees, suppliers and other stakeholder groups expect us to set goals based on sustainability, to let ourselves be assessed on performance and to implement measures for greater sustainability.

As a provider of work clothes, BP® consequently orients itself to the needs of its wearers and customers. That is why BP® considers it especially important that their products meet high quality standards and are manufactured socially and ecologically sustainably throughout the entire value chain.

The BP® Code of Conduct is a guide for us, our suppliers and partners, to which we can all orient ourselves, which we can integrate into our daily work, and use to continually improve. For this, BP® relies on capable suppliers. BP® strives to have a collaborative cooperation with its suppliers, based on open communication and trust, so that all potential within the value chain can be utilized, even beyond the company's own limits.

Our business model is based on trusting partnerships and direct business relationships. We carefully select our suppliers with the interest to create a stable and long-lasting partnership. Complying with our Code of Conduct is the necessary basis for this.

The BP® Identity

1. Customer focus

Our customers and wearers are always at centre of our business. We offer professional clothing solutions and services that live up to the BP® “feel the difference” claim.

2. Continuous improvement and innovation

We use the highest standards in innovation to continuously improve our company as well as our products and services, and, in doing so, we always keep the needs of our customers and wearers in mind.

3. Excellence

We deliver excellent company performance and results by showing initiative and a readiness to accept responsibility, providing mutual support and constantly learning from one another.

4. Transparency and trust

We cultivate a relationship of trust, based on openness, transparency and honesty, with our customers, our suppliers, our investors, everyone who wears our products, and also within BP® itself.

5. Sustainability

We create sustainable values for the people we work with. Economic success equips us for the future. We stand for fair working conditions and use natural resources responsibly.

6. Teamwork, diversity and personal development

We love working in teams and do it well. We respect and affirm diversity. We create space for personal development.

1) Applicability

Our Code of Conduct applies to both the entire BP® organisation and all employees of all suppliers, sub-suppliers, including logistics service providers and their partners (referred to collectively as “partners” below).

The BP® Code of Conduct is based on the conventions of the International Labour Organisation (ILO), the Human Rights Declaration of the United Nations (UN), the Global Compact and the OECD Guidelines for Multinational Enterprises, as well as internationally recognised environmental standards and laws specific to countries.

2) Observance of laws and directives and consideration for cultural values

We observe the rights and laws of Germany and of the respective countries in which we operate. Our partners are obliged to do the same.

If the BP® Code of Conduct deviates from regional laws, regulations or rules, the broader or more stringent regulations shall apply.

3) Responsible Purchasing Practices

The BP® Code of Conduct serves as a basis for business relationships with customers, partners and suppliers. BP® is dedicated to responsible purchasing practices looking at business partners as equal partners. In order to achieve this, open communication with all parties is essential. We support our partners for example with forecasts and regular fixed capacities that make a good production planning possible.

We also support transparent pricing as far as possible and are in constant exchange with our partners. We acknowledge that prices are directly linked to wages and pay therefore close attention to political and economic changes in the countries we source.

To comply with our due diligence responsibility we conduct a thorough risk assessment of all countries where BP® is active in or sources from. Through this ongoing assessment, we are able to identify risks at an early stage, track developments and can actively work on improvements together with our partners.

Due to our understanding of responsible purchasing practices, we focus on our whole supply chain in detail.

For details of our understanding, please also see Common Framework for Responsible Purchasing Practices:

<https://static1.squarespace.com/static/636ba8ae2fd47349a887dd92/t/642ecf75bca27075443eac29/1680789366782/CFRPP+full+Framework.pdf>

4) Social responsibility

4.1 Respect for human rights

Article 1 of the Basic Law for the Federal Republic of Germany states: “Human dignity shall be inviolable”.

This principle forms the basis of BP®’s Code of Conduct, which must be acknowledged by all of its partners.

4.2 Gender justice

BP® does not tolerate any kind of gender based violence. BP® sets a zero-tolerance policy in its own organisation, supply chain but also at suppliers and customers.

BP® collects gender specific data from direct partners (tier 1) to identify potential risks in an early stage. BP® examines each country in an extensive risk analysis regarding gender justice and a potential injustice. This is openly discussed with the suppliers. All human beings must have the same chance of a safe work environment as well as appropriate wages and the chance to further education.

The ILO conventions 100, 111, 183 and 190 apply.

4.3 Eliminating violence and harassment in the workplace

Violence and harassment in the workplace in the form of unacceptable behaviours and practices, illegal disciplinary measures, such as physical or verbal assault, physical, psychological or sexual abuse or other forms of intimidation or threats are prohibited, whether it is a single instance or a repeated occurrence.

This applies to violence and harassment in the workplace that may occur in connection with or as a result of work in the following places: Places of work, including all private rooms which are treated as work spaces, quiet rooms and break rooms, sanitary facilities, washrooms and changing facilities, business travel, trips, trainings, events, business activities, work-related communication, accommodations provided by the employer and on the way to and from work.

BP® expects its partners to take thorough and adequate measures to prevent violence and harassment in the workplace, including gender-specific violence and harassment. This includes meetings with employees and/or their representatives as well as appropriate awareness-raising and training measures for all employees.

Employees must be aware of all work rules that are to be followed and of the consequences for violations. All employees and especially management who are guilty of abuse or other misconduct must be held accountable for their behaviour.

BP® therefore expects its partners to implement a functional complaint system and the management to handle it.

All employees must be able to lodge complaints without fear of retribution or illegal disciplinary measures.

The ILO convention 190 applies.

4.4 Prohibition of forced labour

BP® does not allow forced labour, bonded labour, threats, exploitation, corporal punishment or participation in slave trade of any kind. This includes prison labour and especially Sumangali.

The employment relationship must be voluntary. Employees may not be held in the workplace against their will. All employees have the right to terminate their employment relationship in accordance with statutory notice periods.

The ILO conventions 29 and 105 apply.

4.5 Non-discrimination

BP® does not allow discrimination of any kind. Employment, wage policies, access to training, career opportunities, termination of employment relationships and retirement age must all take into account the principle of equal treatment. Unequal treatment based on the characteristics of certain groups of people, such as ethnic origin, skin colour, language, religious beliefs, sexual orientation, gender, age, family obligations, marital status, disability or membership of a workers' organisation or union is prohibited.

The ILO conventions 100, 111, 143, 158, 159 and 183 apply.

4.6 Prohibition of child labour

All BP® partners must ensure that no children below the age of 16 are employed anywhere within their supply chains. The age for admission to employment may not be lower than the minimum age for completing compulsory education. No form of slavery or practices similar to slavery, such as the sale and trafficking of children, bonded labour and servitude or forced or compulsory labour. Adolescents [between the ages of 15 and 18] may not perform any work which could be detrimental to their health, safety or morals due to its nature or the circumstances in which it is performed. If adolescents are employed, it must be ensured that they complete their schooling first and then given the opportunity for job training and/or other/additional training programmes. The applicable youth protection laws must be observed and adhered to in all circumstances.

All partners are obliged to establish appropriate internal policies to ensure that child labour is not permitted. Furthermore, there must be appropriate rules in place regarding compensation.

The ILO conventions 138, 79, 142 and 182 apply in addition to ILO recommendation 146.

4.7 Right to freedom of association and collective bargaining

All employees of our partners must be given the right to organise in unions or to join unions in accordance with legal provisions. The right to collective bargaining must be recognised. In countries where union rights are restricted under the law, employees should be offered a form of representation of the company's interests, as equivalent as possible. It must be ensured that worker representatives are not subjected to any harassment, discrimination, intimidation or retaliatory measures. Worker representatives must be able to enter the workplace freely within the scope of laws and regulations.

The ILO conventions 87, 98, 135 and 154 apply in addition to ILO recommendation 143.

4.8 Reasonable remuneration

Our aspiration are reasonable wages for the people who work for us and manufacture our products. Reasonable wages cover at least the basic needs including an additional amount for discretionary expenses.

We expect all of our partners to keep themselves thoroughly and comprehensively informed of their employees' basic needs as a matter of principle. Worker representatives should be consulted. Further guidance regarding basic needs, e.g. information on living wages, is available from non-governmental organisations (NGOs) or local unions.

This means that **all employees** must be paid a minimum wage corresponding to at least the applicable statutory minimum wage plus any other legally mandated benefits.

Any overtime worked must be compensated in accordance with the statutory requirements at minimum. The statutory social security obligations must be carried out. Deductions from wages for the purposes of disciplinary measures or other illegal wage deductions are prohibited. Every employee must be provided with a payslip of the exact calculation of their wages (including deductions and allowances).

Furthermore, it must be ensured that employees are able to understand and comprehend their pay slips.

Our partners must ensure this throughout their supply chains.

We recommend reasonable compensation for days missed due to illness in countries where sick pay is not regulated.

At the same time, we prefer our partners to support their employees with medical care, information and screenings. This especially applies to countries where adequate free medical care is not guaranteed.

Furthermore, it is presumed that each company will have a suitable wage policy to implement an adequate wage management system, which will ensure that wages will cover at least one inflationary adjustment at regular intervals within the economic framework.

The ILO conventions 26, 102 and 131 apply.

4.9 Reasonable work hours

Our partners are obliged to observe the legal regulations regarding work hours and to ensure this in their supply chains as well. Regular work hours, including overtime, must always meet the requirements of ILO conventions. Production must be planned so that excessive overtime is not needed. If overtime is unavoidable, overtime bonuses must be paid that are equal to the statutory requirements at minimum. It should be noted that overtime may only be worked on a voluntary basis and may not be assigned regularly.

Our partners shall ensure that the maximum number of 6 work days per week is not exceeded and that each employee is guaranteed 1 day off every 7 days.

The ILO conventions 1 and 14 apply in addition to ILO recommendation 116.

4.10 Safe and healthy working conditions

All employees have the right to a safe workplace and a healthy work environment. All of BP®'s partners must ensure this accordingly. Preventive measures must be taken in accordance with the statutory regulations at minimum, including building and structural safety, fire prevention, machine safety, chemical safety and emergency medical care. The optimum solutions from industry-specific and operational occupational health and safety should be implemented in doing so.

If dormitories for employees are provided, the requirements above also apply accordingly.

Each partner is obliged to ensure extensive monitoring for compliance with the required safety measures in their company and their supply chain.

This includes both systematic rectification and prevention as well as the consistent implementation of corrective measures. In the event of violations, appropriate remedial measures should be ensured and taken.

The ILO convention 155 applies in addition to ILO recommendation 164.

4.11 A legally binding work relationship

Each partner of BP® must ensure that all of their employees are employed legally. This presumes that all employees have a written and signed work contract. The following information at minimum should be regulated in the work contract: role, start date, hours to be worked, compensation (calculation details, social security contributions, pay date and disbursement procedures), trial period (if applicable), term of validity for fixed-term contracts, holiday entitlement, termination conditions, the signatures of the employee and employer and the date. All employees must be given a signed copy of the work contract.

Chain contracts (multiple fixed-term work contracts with a single employee) are prohibited.

The ILO convention 155 applies in addition to ILO recommendation 164.

5) Ecological responsibility

As a textile company, we depend on a variety of raw materials and thus consider ourselves responsible for doing our part to protect the environment.

Following the principle: Eliminate, Reduce and Recycle, we are committed to understanding the impact of our actions on our environment and to continually improving.

We expect our partners to abide by the provisions of the law regarding the protection and preservation of the environment. This includes both legal regulations and internationally accepted standards and industry standards, as well as meeting the guidelines for emissions limits.

All partners in our supply chain are committed to understanding carbon emissions, gradually reducing them and offsetting them where possible. Likewise, all forms of waste should be avoided, and water/wastewater and energy consumption should be optimised. Chemicals and other materials are always handled, stored and disposed of properly.

6) Handling of information (data privacy/secretcy)

All parties involved are obliged to treat sensitive information and business secrets as well as personal data as confidential. This applies both during and after the business relationship.

7) Competition and anti-trust regulations

All relevant regulations of competition and anti-trust law must be observed by all parties involved.

8) Bribery and corruption

BP® does not tolerate corruption or bribery of any kind. This applies to direct and indirect benefits in the form of money, inappropriate gifts, invitations or other inappropriate contributions with the aim of receiving preferential treatment or manipulating their counterparts.

The requirements from the 10 Principles of the UN Global Compact (Principle 10) as well as the requirements from the OECD Guidelines (OECD = Organisation for Economic Co-Operation and Development) apply.

9) Implementation

The standards defined in this Code of Conduct are contractually binding for our partners. Partners accept their obligation to implement these standards. All employees of our partners must be informed of their rights and obligations in this Code of Conduct and trained on its implementation. If applicable, any worker representation should be involved in ensuring the standards and complaint management. If there are deviations from the Code of Conduct, the worker representatives should be involved in the corrective measures.

We expect that all partners implement the standards of this Code of Conduct and the legal provisions through systematic management practices. Corresponding company policies should thus be implemented, corrective measures should be defined in the event of deviations and they should be implemented within an appropriate timeline.

BP® conducts an extensive risk analysis in its own supply chain, to identify potential risks in an early stage. These risks are regularly analysed and evaluated. This analysis ensures an immediate opportunity for action or the implementation of preventive measures. Additionally, BP® cooperates with other companies that work together with the same suppliers. This way we have more influence to make a change. Together we identify risks and act accordingly.

BP® actively supports social dialogue (s. 3.7). Whenever possible or necessary, trade unions, worker representatives and works committees are consulted in order to assess potential risks better and act accordingly.

10) Auditing and complaint management

BP® is entitled to audit their partners or to have them audited by third parties in order to ensure that all of the agreements in this Code of Conduct and any annexes are consistently upheld.

Furthermore, BP® or third parties commissioned by BP® are entitled to visit production sites, supervise the production process on site, view requested documents or conduct interviews with employees if needed.

The results of the audit will be provided in writing to the supplier upon request. Measures for improvement and their implementation will be discussed with the partner.

All employees of the partner shall be given the right to lodge complaints about violations of this Code of Conduct, both internally and externally. Complaint management for handling these shall be provided accordingly. Employees who make use of their right to lodge complaints should be protected from negative repercussions or threats of penalisation; as such, there must be a possibility to lodge complaints anonymously.

11) Final provisions

Repeated or serious violations of the standards in our Code of Conduct, especially forced and child labour, attempted fraud and failure to try to take corrective action will result in termination of the business relationship with BP®.

All partners of BP® including their upstream suppliers are obliged to abide by and implement the standards in this Code of Conduct.

12) Transparency

Transparency is a crucial key element for successfully implementing our sustainability strategy and as such, we rely on the highest possible level of transparency in our preliminary stages.

Our Code of Conduct is binding for all BP® employees and is available to view on our internal database and our website <https://www.bp-online.com/en-uk/>.

Our business partners, suppliers and manufacturers acknowledge our Code of Conduct with their signatures. We encourage them to share our Code of Conduct with all workers, representatives, trade unions and works committees.

Cologne, 15.12.2023

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