

CHRISTIANSEN PRINT CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS

I. Introduction

Christiansen Print strives to be a responsible preprint company. Christiansen Print is committed to the principles set out in this Code of Conduct. At the same time, Christiansen Print expects its suppliers and service providers to comply with the principles set out in this Code of Conduct and to demand the same commitment from their direct suppliers and service providers. Christiansen Print includes the following companies and sites:

Christiansen Print GmbH
Trift 4,
38871 Ilsenburg
Germany

Christiansen Print GmbH Breslauer
Straße 21,
37154 Northeim
Germany

Christiansen Print Garancières SAS
La Haute Épine, ZA Dièpe,
28700 Garancières-en-Beauce
France

II. Scope

This Code of Conduct in its currently applicable version applies to all Christiansen Print suppliers and service providers to whom there is a direct business relationship (hereinafter referred to as "business partners"). The currently valid version of this document is available at: <http://www.christiansenprint.de/mehr-service/downloads>

1. Compliance with legislation

All applicable laws and regulations, whether national or international, as well as industry minimum standards, International Labour Organisation (ILO) (*see page 8*) and UN Conventions as well as all other relevant statutory provisions shall be observed, whereby those with the most stringent requirements shall govern.

Compliance with this Code of Conduct and the above-mentioned standards must not be circumvented by ancillary agreements, such as contractual agreements or similar means.

2. Corruption and bribery

Christiansen Print is committed to opposing corruption and bribery and requires its business partners to comply with anti-corruption legislation. Business partners ensure that they will not offer, promise or grant any unauthorized benefits to Christiansen Print employees (*see page 8*) or to any persons close to them. The same applies to any person who acts on the instruction of business partners.

Indications of corrupt behaviour must be reported to the independent, external contact person (ombudsman, see *Section IV Grievance procedure*). In a statutory procedure, the ombudsman will directly liaise with Christiansen Print management and protect the anonymity of the reporting party towards the company, whenever necessary.

3. Anti-monopoly law and competition law

Christiansen Print adheres to all applicable domestic, EU-wide and foreign anti-monopoly laws as well as to any legislation relating to unfair competition and also expects the same attitude from its business partners. Agreements on prices or terms made with competitors are therefore not permitted, nor are other restrictive agreements -in particular agreements with competitors- for the purpose of assigning markets or customers.

Indications of anti-competitive behaviour are to be reported to the independent external contact person (ombudsman, see [Section IV Grievance procedure](#)). In a statutory procedure, the ombudsman will directly liaise with Christiansen Print management and protect the anonymity of the reporting party towards the company, whenever necessary.

4. Occupational health and safety

A safe and healthy working environment is a decisive factor for a company's success. Business partners are therefore obliged to provide safe, healthy and hygienic working environments to their employees and to take the necessary measures to prevent accidents and hazards to health that may arise in connection with employee activities. It is therefore imperative to ensure that occupational safety standards are observed. Business partners shall take appropriate and demonstrable measures to this end and operate systems (e.g. based on OHSAS 18001 or comparable systems) that help them to identify and prevent potential hazards to the health and safety of their employees.

In addition, supplementary regulations from the individual companies and sites concerning e.g. occupational health and hygiene as well as other relevant regulations are to be complied with, wherever appropriate.

5. Working hours

Working hours must comply with applicable national legislation, industrial standards or relevant ILO conventions ([see page 8](#)), whichever text is more stringent.

6. Remuneration

Christiansen Print ensures that the wages paid to employees are at least equal to the statutory wage or to the minimum wage stipulated in the industry concerned, whichever is higher. The minimum wage laws applicable are to be complied with. Any illegal and unauthorized deductions, in particular those resulting from direct or indirect disciplinary measures, are prohibited. Wages shall be paid in a form which is convenient to employees. Employees shall receive regular, detailed and clear information on how their remuneration is structured.

7. Freedom of organisation and association

Christiansen Print respects the right of all employees to form unions and become union members as well as to bargain collectively and is committed to ensuring that these rights are not restricted. Christiansen Print also requires the same attitude from its business partners. In the event that the right of association and the right to collective bargaining are restricted by national standards, a free and independent employee association will have to be made possible and permitted as an alternative for the sake of negotiation.

8. Child and youth labour

Christiansen Print will not tolerate the exploitation of children and young persons in any form. Child labour as defined by ILO and United Nations Conventions ([see page 8](#)) as well as by national provisions is prohibited. The minimum age for admission to employment shall not be lower than compulsory school leaving age and under no circumstances under 15 years of age. Young persons must not be exposed to hazardous, unsafe or health-endangering situations.

9. Forced labour

Christiansen Print is opposed to any form of forced labour. In accordance with ILO conventions ([see page 8](#)), any form of forced and compulsory labour, as well as any involuntary prison labour that violates human rights is prohibited. Business partners may only employ workers who have volunteered for employment.

10. Disciplinary measures

Christiansen Print advocates that all employees are to be treated with dignity and respect. Consequences for infringements, fines, other penalties or disciplinary measures may only be applied in accordance with applicable national and international standards as well as with internationally recognised human rights. Business partners shall guarantee that no employee is subjected to verbal, psychological, physical, sexual and/or physical violence, coercion or harassment.

11. Discrimination

Christiansen Print and its business partners undertake to refrain from any discrimination when appointing or employing staff. In particular, any form of distinction, exclusion or preference based on:

- ethnic, national and social origin
- race
- skin colour
- gender
- age
- nationality
- religious beliefs
- political opinions
- membership in an employee organization
- physical or mental disabilities
- sexual orientation

or on any other personal characteristics is prohibited.

12. Environmental protection

Christiansen Print designs its business processes in an environmentally responsible manner and undertakes to respect all applicable laws and statutory minimums as regards climate and environmental protection. Christiansen Print expects its business partners to observe legal requirements as well as eco-friendly management practices, i.e.:

- to manage resources (energy, water, raw materials and supplies) efficiently,
- to use eco-friendly materials, wherever possible,
- to avoid or reduce emissions and waste, and
- to design environmentally-friendly logistics processes.

Christiansen Print recommends that its business partners take appropriate and comprehensible measures and operate proven systems to protect the environment, such as management systems according to ISO 14001, ISO 50001 or comparable systems.

Christiansen Print attaches great importance to transparency in the paper supply chain and expects its paper suppliers to be FSC[®] certified and to strictly abide by the applicable EU Timber Regulation. Business partners undertake to support responsible forest management and, amongst other things, not to use illegal timber or wood products from non-transparent sources.

13. Confidentiality and data protection

Christiansen Print expects its business partners to treat all business data in a confidential manner. Confidential information such as personal data from Christiansen Print employees, customers and/or business partners and/or business information shall not be disclosed or used for other purposes than a direct collaboration with Christiansen Print.

III. Implementation

The business partner undertakes to comply with the above principles. Compliance with the above environmental and social standards has to be demonstrably documented. Christiansen Print recommends that continuous improvement be made possible by operating an adequate system (definition and documentation of responsibilities, procedures, objectives and measures). In turn, Christiansen Print expects its business partners to impose these minimum standards on their direct suppliers and service providers and to check compliance.

IV. Information and communication

The business partner is requested to make the provisions contained in the present Code of Conduct available to all his/her employees. When doing so, he or she can also communicate a corresponding set of rules to his/her employees and suppliers, provided that this set of rules contains all the minimum standards specified in the "Christiansen Print Code of Conduct for Suppliers and Business Partners" and it requires suppliers to comply to the same extent at least. The present Code of Conduct can be viewed at <http://www.christiansenprint.de/mehr-service/downloads> and printed out from there at any time.

V. Verification of compliance

The business partner agrees that compliance with the above requirements can be verified either by Christiansen Print itself or by an independent third party commissioned by Christiansen Print with reasonable prior notice. The results of this review shall be made available to the business partner concerned.

VI. Grievance procedure

Complaints or indications of infringements of this Code of Conduct may be reported to Christiansen Print at any time by writing to the independent external contact person (ombudsman) mentioned below. At the request of the reporting person, this communication will be kept confidential as regards the author's identity. In a statutory procedure, the Ombudsman will directly liaise with Christiansen Print management.

The grievance procedure must not be used to deliberately submit false information or indications.

Christiansen Print's ombudsman in charge of grievance procedures in Germany is:

Dr. Dietmar Buschhaus, Götzenbreite 1, 37124 Rosdorf, Tel: +49 (0)551 900 33 530, Fax: +49 (0)551 900 33 555, E-mail: [buschhaus\(at\)ra-kleinjohann.de](mailto:buschhaus(at)ra-kleinjohann.de).

VII. Consequences of infringements and remedial measures

If infringements of this Code of Conduct have been established, the business partner has to inform Christiansen Print immediately in writing and initiate appropriate remedial measures. Christiansen Print shall grant him/her sufficient time to implement these remedial measures. In case of infringements and depending on their severity and that of the individual case, Christiansen Print reserves the right to terminate the corresponding contract for serious grounds without observing the notice period.

If a business partner to whom the relationship was terminated in the past as a result of his/her failure to comply with this Code of Conduct can subsequently prove that he/she is now in a position to fully meet said requirements, the business relationship may in principle be resumed without restriction.

Status: August 2017

The undersigned confirms that the company's management has been informed of the Christiansen Print Supplier Code of Conduct and that the rules set out in this Code of Conduct are complied with accordingly.

Company:

Name:

Function:

Place and date:

**Signature of the authorised representative
+ company stamp:**

The following overview is designed to help readers to understand the corresponding ILO conventions better. As a few German laws go beyond the limits of some of these texts, Germany has not ratified some of the conventions listed below.

Overview of relevant ILO Conventions and Recommendations → [back to document start](#)

No.	Title
1	Hours of Work (Industry)
14	Weekly Rest (Industry)
26	Minimum Wage-Fixing Machinery
29	Forced Labour
79	Night Work of Young Persons (Non-Industrial Occupations)
87	Freedom of Association and Protection of the Right to Organise
98	Right to Organise and to Bargain Collectively
100	Equal Remuneration
105	Abolition of Forced Labour
111	Discrimination (Employment and Occupation)
131	Minimum Wage Fixing
135	Workers' Representatives
138	Minimum Age
142	Human Resources Development
143	Migrant Workers (Supplementary Provisions)
154	Collective Bargaining
158	Termination of Employment
159	Vocational Rehabilitation and Employment (Disabled Persons)
182	Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour
R143	Recommendation concerning Protection and Facilities to be Afforded to Workers' Representatives in the Undertaking
R146	Recommendation concerning Minimum Age for Admission to Employment

To read the English version of the above Conventions and Recommendations, please visit: www.ilo.org