

Code of Conduct

of VEMAG Verlags- und Medien AG
and all its affiliated companies

1. Preamble

The VEMAG team firmly believes that books with carefully reviewed content, safe materials, and hazard-free technical features should be accessible to everyone. Thanks to our unusually high-frequency distribution channels for a publishing company, we reach a very wide international audience with our impulse-buy products. We see our typically high print runs as a particular obligation to act sustainably in the fields of economy, ecology, and social responsibility.

Therefore, it is crucial for us that human rights are respected and social and environmental standards are upheld throughout the entire supply chain. We place great importance on producing, storing, and transporting all products in the most environmentally friendly way possible to contribute to the protection of our living environment.

We work only with business partners who commit to the principles of social and ecological sustainability outlined as examples in this Code of Conduct and who comply with applicable laws, guidelines, and regulations.

Our Code of Conduct is based, among others, on the following internationally recognised principles:

- International Bill of Human Rights
- UN Guiding Principles on Business and Human Rights (UNGP)
- UN Convention on the Rights of the Child
- The Ten Principles of the UN Global Compact (UNGC)
- Core Labour Standards of the International Labour Organization (ILO)
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- Paris Agreement
- Basel Convention
- UN Convention on Biological Diversity

2. Scope

This Code of Conduct applies to VEMAG Verlags- und Medien AG and all its affiliated companies (hereinafter collectively: VEMAG):

- Burkart GmbH
- Circon Verlag GmbH
- Delphin Verlag GmbH
- Good Life Books & Media GmbH
- MZ Medien Zentrum GmbH
- Naumann & Göbel Verlagsgesellschaft mbH
- Schwager & Steinlein Verlag GmbH
- SMV Schätz mal Verlag GmbH
- VIP GmbH Vruchten Import and Processing
- We Mind Publishing GmbH

This document also applies to any company and every individual involved in the production of our books. It forms the basis for collaboration with all VEMAG business partners.

3. Our Principles

3.1. Basic Requirements

For all VEMAG companies, it is a matter of course to comply with applicable international and national laws and regulations and to implement internal company standards, as violations can have serious consequences for the company as well as for individual employees. We take reports of violations seriously and investigate them to take appropriate action and remedy the situation.

We also expect our business partners to comply with international and locally applicable laws and regulations as well as the social and ecological principles outlined below, and to implement them in their processes.

3.2. Work and People

3.2.1. No Discrimination

Discriminatory behaviour has no place at VEMAG—whether towards colleagues, suppliers, or other business partners, and at no point during the recruitment and employment relationship or business relationship. Every person has the right to equal opportunities. We value our diversity and are convinced that it enriches us and contributes to the success of our publishing group.

We also expect our business partners to actively combat any form of discrimination and prevent any person from being discriminated against or disadvantaged, whether due to their skin colour, ethnic origin, nationality, social background, gender, sexual orientation, age, family responsibilities, illness, disability, political beliefs, religion, or ideology, other personal characteristics, or other unjustifiable circumstances. Instead, measures should be taken to promote equal opportunities for all employees.

3.2.2. Fair and Respectful Treatment

Every person is entitled to fair, respectful, and appreciative treatment as well as physical and psychological safety in the workplace. Gross or degrading behaviour is therefore not tolerated at VEMAG. This includes any form of intimidation, hostility, harassment, and abuse, both verbal and non-verbal—especially (but not exclusively) sexual harassment, physical violence, mental and physical coercion, insults, and slander. Threatening such behaviour is also prohibited, as well as disciplinary actions that violate human dignity.

Our business partners are responsible for creating a work environment where employees are protected from such gross or inhumane behaviour.

3.2.3. Appropriate Working Conditions

VEMAG employs its staff under fair working conditions that comply with international labour and human rights as well as applicable (local) laws and regulations. These must also be respected and implemented by business partners.

All employees should be employed in a formal working relationship where duties and rights are documented in a (written) employment contract. Their privacy is respected, and their personal data is treated confidentially and protected.

Wages, social benefits, and other allowances paid to employees must be adequate and sufficient for subsistence but should always comply with (local) statutory minimum wages and industry standards (e.g. regulations on social security, paid leave). Remuneration must be paid regularly and in full. Employees also have the right to receive regular and understandable information about their pay structure.

Working hours must not exceed (locally) legally set limits. Overtime should not be regularly worked. The number of overtime hours must not exceed the (local) legally permissible level. Appropriate breaks and statutory rest days must be observed. Additional work performed must be compensated separately, either through monetary payment or time off.

Working conditions must not be restricted by direct or indirect disciplinary measures, such as withholding wages or social benefits.

3.2.4. Health and Safety at Work

Workplace safety and the health of our employees play a crucial role at VEMAG. We regularly review and assess risks and take measures to counter these risks, ensuring a physically and mentally healthy and safe work environment.

We also expect our business partners to comply with occupational health and safety regulations, provide a clean, safe working environment, and offer appropriate protection for employees. Workplaces must be equipped according to legal requirements. Business partners should take appropriate measures to protect their employees from excessive mental and physical fatigue and provide them with an emergency plan, which includes first aid and fire protection measures. Employees should be regularly trained in workplace health and safety.

Young people under the age of 18 must be especially protected from dangerous or unsafe conditions that could endanger their health and development.

3.2.5. No Forced or Child Labour

Forced labour, modern slavery, human trafficking, and similar conditions are prohibited, meaning no person should be forced through punishment, other forms of oppression, or any other kind of violence—especially economic or sexual exploitation or degradation—to perform work or services they have not voluntarily undertaken. Employees also have the right to terminate their employment in compliance with legal notice periods.

Disciplinary measures that prevent employees from leaving their workplace, including withholding personal documents (e.g. identity cards), are prohibited.

The rights of children and young people are of particular importance. Child labour in any form is prohibited throughout the supply chain. Minors must not be employed full-time while they are of school age, and in no case if they are under the age of 15 (or 14 if allowed under ILO Convention 138). The minimum employment age is raised to 18 if the work could endanger or impair the development of young people.

Our business partners must respect and implement these prohibitions and rights in their business practices, ensuring compliance with all (local) laws and regulations related to the prevention of forced and child labour.

3.2.6. Freedom of Association and Collective Bargaining

We respect the rights to freedom of association and collective bargaining. All employees are free to assemble in accordance with (local) laws.

Our business partners also guarantee these rights for their employees. Employees who exercise these rights should not face reprisals.

3.2.7. Rights of Affected Communities

Indigenous peoples and communities have the right to use and manage land according to their customs and traditions. Their habitat is under special protection. Their interests must not be disregarded in land management, and their property must not be exploited.

Our business partners respect these (local) land rights and commit to avoiding unlawful evictions, particularly when they threaten the livelihood of affected individuals.

3.3. Ethics

3.3.1. Fair Competition

VEMAG advocates for free and fair competition. We do not tolerate anti-competitive agreements and ensure that we act in compliance with applicable antitrust laws. We reject competitive advantages gained through unfair business practices.

3.3.2. No Bribery or Corruption

VEMAG rejects any form of bribery, corruption, and extortion. All employees and business partners of VEMAG are required to avoid even the appearance of such practices—whether in the form of granting or accepting improper benefits. They must immediately refuse any demand for bribes or other advantages, whether in business or private contexts, and promptly report it to the legal department.

3.3.3. Transparency

VEMAG acts in accordance with (local) regulations for import and export controls and complies with legal requirements to prevent money laundering. This means that anonymous business transactions are prohibited, and any suspicious business partners and/or transactions must be reported.

VEMAG ensures that it does not violate applicable economic embargoes, sanctions lists, trade, import and export control regulations, or rules related to the prevention of terrorism financing through its transactions with third parties. These obligations also apply to VEMAG's business partners.

3.3.4. Avoiding Conflicts of Interest

VEMAG values the avoidance of conflicts of interest arising from employment relationships. Employees are not permitted to run or work for a company that competes with or has a business relationship with VEMAG. Employees may not conduct business on behalf of VEMAG with companies in which they, immediate family members, or partners have an interest. Employees who are aware of a potential or actual conflict of interest are required to inform their supervisors or management immediately for quick resolution.

3.3.5. Information Security and Data Protection

VEMAG ensures the utmost care, strict confidentiality, and compliance with (local) laws and regulations when collecting, storing, processing, transmitting, and sharing personal data (e.g., name, address, phone number, date of birth, health information) of employees and business partners.

These obligations also extend to VEMAG's business partners. We also expect our business partners, like VEMAG, to protect trade secrets.

3.3.6. Intellectual Property

VEMAG respects the intellectual property of all business partners and ensures that when transferring know-how and technologies, sufficient precautions are taken to protect intellectual property rights. These obligations also apply to VEMAG's business partners.

3.4. Environment

3.4.1. Environmental Protection Laws

Successful and sustainable business practices are inseparable from protecting our living environment; healthy and safe workplaces are linked to clean air, clean water, and a livable environment. We base our business activities on the international environmental agreements (mentioned above exemplarily) and take appropriate measures to incorporate all applicable legal environmental requirements into our business practices. We expect the same commitment from our business partners.

Due to our high demand for paper, regulations related to the commodity *wood* are of particular importance. Our suppliers, both inside and outside the EU, commit to ensuring through appropriate measures that they comply with all applicable legal environmental requirements in their operations and that they use only materials in our products that may be imported into the countries where our products are sold.

3.4.2. Responsible Use of Natural Resources

We accept the responsibility that each individual has towards the environment and therefore handle resources like energy and water carefully in our daily work.

We aim to produce and transport our books and other products as resource-efficiently and energy-efficiently as possible. Environmental impacts should be avoided. Our business partners commit to taking appropriate measures to make the use of resources, especially paper and water, more efficient in their operations, reduce waste, and prevent or, where complete prevention is not possible, minimise water and air pollution.

3.5. Quality and Product Safety

Our goal is to offer our customers high-quality publishing products. Therefore, the highest quality standards apply to all VEMAG products, especially for all books and other products aimed at children. They must be designed and manufactured in such a way that ensures the safe use of the product. Our suppliers commit to using only materials that do not contain prohibited harmful substances and that comply with the legal regulations of the countries where our products are offered.

4. Implementation

4.1. Implementation Along the Supply Chain

Our business partners commit to implementing the principles set out in this Code of Conduct in their own business operations, informing their business partners of these principles, and ensuring compliance through appropriate contractual agreements and regular reviews.

4.2. Reporting Violations

Violations of this Code of Conduct should be reported as early as possible so that countermeasures can be implemented swiftly and potential damage averted. VEMAG has established an internal reporting office for this purpose.

Our business partners also commit to establishing an internal reporting system, thoroughly investigating all reports, and implementing appropriate corrective measures. Employees who provide information must not face reprisals or disadvantages as a result.

4.3. Corrective Actions

If VEMAG becomes aware of an actual or impending violation of the Code of Conduct, appropriate measures will be taken to end the violation as quickly as possible, prevent it, or minimise any resulting damage.

If our business partners become aware of an actual or impending violation of this Code of Conduct, whether in their own operations or their supply chain, they should also initiate appropriate corrective measures.

Upon request, VEMAG's business partners must present their plan for ending or minimising the violation. On request, business partners must work with VEMAG to develop and implement a plan for preventing, ending, or minimising a violation.

4.4. Termination of Business Relationship

In the event of a violation of this Code of Conduct, VEMAG is entitled to set a reasonable deadline for its business partners within which the violation must be remedied. If the deadline passes without the violation being remedied, VEMAG is entitled to terminate the contract. In the case of a serious violation, the contract may be terminated without notice. Should business partners suffer damages as a result of such termination, VEMAG is not obliged to provide compensation.

*Cologne,
October 2024*

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We hereby confirm to have read the Code of Conduct of VEMAG (document version v1_2410), to commit to the outlined principles of social and ecological sustainability and to comply with applicable laws, guidelines, and regulations.

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