



Code of Conduct of FC St. Pauli Merchandising GmbH & Co. KG

for business partners to comply with minimum social and ecological standards

This Code of Conduct was drawn up in accordance with SA 8000:2001 (Standard for Social Responsibility of Social Accountability International), the Universal Declaration of Human Rights and based on Conventions 26, 29, 87, 98, 100, 105, 111, 131, 135, 138, 182 of the International Labour Organisation (**ILO**), in order to ensure decent working conditions and minimum social standards for all employees worldwide who produce products placed on the market by FC St. Pauli Merchandising GmbH & Co. KG (henceforth FC St. Pauli Merchandising).

FC St. Pauli Merchandising requires its contractors and suppliers, as well as their subcontractors, to guarantee these working conditions and to respect these names when manufacturing products or product parts for FC St. Pauli Merchandising.

The local legislation in force at the place of production is the responsibility of FC St. Pauli Merchandising and must also be recognised and complied with by all subcontractors. If there are national applicable laws that regulate the same issues as the Code, the provision that offers the greatest protection to employees must be applied.

1. voluntary employment

FC St. Pauli Merchandising does not accept forced labour, including slave or prison labour or debt bondage.

Forced or compulsory labour is any kind of work or service that is required of a person under threat of some form of punishment and for which he or she has not volunteered. (**ILO Conventions 29 and 105**)

Furthermore, employees must not be forced to hand in a "deposit" or identity papers to the employer.

2. no discrimination

Discrimination shall mean any distinction, exclusion or preference based on sex, age, ethnic origin, colour, religion, caste, nationality, political affiliation, membership of political parties or workers' organisations, sexual orientation, social origin, disability, marital status or any other personal characteristic which results in the elimination or impairment of equality of opportunity or treatment in employment or occupation. This includes recruitment, wage policy, admittance to training programs, employee promotion policy, policies on employment termination, retirement, and any other aspect of employment.



FC St. Pauli Merchandising expects equal treatment and opportunities to be provided. (**ILO Conventions 100 and 111**)

3. no child labour

Under no circumstances may child labour be used. In accordance with **ILO Convention 138**, only workers who have passed compulsory school age and are at least 15 years of age will be employed.

There shall be no forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour.

The minimum age for admission to employment or work which, by its nature or the circumstances in which it is carried out, is likely to endanger the life, health or morals of adolescents shall in no case be less than 18 years. (**ILO Convention 182**)

If necessary, child workers to be dismissed must be offered sufficient financial transitional assistance and appropriate educational opportunities. The employer must ensure that the standard of living of these child workers does not deteriorate and must pay any costs that may be incurred.

The employer is obliged to keep and make available records or documents containing the names and age or date of birth of the persons under 18 employed/working for him. Overtime by workers under the age of 18 is not permitted.

4. fair remuneration

Wages shall meet at least legal or industry minimum standards or applicable collective agreements, whichever is higher, and always be sufficient to meet the basic needs of workers and their families and include an amount at their free disposal. (**ILO Conventions 26 and 131**)

No deductions from wages are permitted as a punitive measure, nor are deductions permitted which are not justified by national laws. Deductions shall never constitute an amount that will lead the employee to receive less than the minimum wage.

All employees receive written and comprehensible information on the wage conditions before starting work and on the exact details of their wages for each pay period.

The wage must be paid on time, at regular intervals and in the form of legal tender directly to the employees.

Men and women must be treated equally with regard to remuneration for equivalent work.



5. freedom of association

The right of all workers to form and join trade unions or similar organisations with appropriate statutes and the right to collective bargaining are recognised. (**ILO Conventions 87 and 98**)

Worker representatives must not be discriminated against and must have access to all necessary jobs in order to perform their representative functions (**ILO Convention 135 and Recommendation 143**).

Employers should adopt a positive attitude towards the work of trade unions and be open to their activities in organising employees. In those situations in which the right to freedom of association and collective bargaining are restricted under law, the employer facilitate parallel means of independent and free association and bargaining for all workers.

6. decent working hours

The working hours are in accordance with the applicable laws and standards of the industry. Employees must not be required to work more than 48 hours a week on a regular basis and within a given period of time of 7 days, they must have at least one day off. Overtime must be voluntary, may not exceed 12 hours per week, may not be ordered on a regular basis and must always be accompanied by an overtime supplement to wages. (**ILO Conventions 1 and 14**)

Workers must be able to take leave and sick leave without fear of repressive measures. (**ILO Convention 14 and Recommendation 116**)

7. working environment and safety

A safe and hygienic working environment must be ensured and the largest possible health and safety protection in the workplace shall be promoted under consideration of current knowledge of the industrial sector and any specific hazards. (**ILO Convention 155**)

Employers are obliged to ensure that the workplaces, machinery, equipment and processes subject to their right of disposal do not pose a risk to the health of workers, if necessary through adequate safety measures.

The employees are to be informed about any occupational risks and the available means of prevention.

The employer is obliged to provide and maintain appropriate and necessary protective equipment (clothing, gloves, glasses, hearing protection) and to explain their use. As far as possible, machines are equipped with protective devices. The employees are to be instructed in their function.

Measures of air pollution, noise and vibrations must be taken, and workplaces must be adequately lit and ventilated.



All work areas must have a sufficient number of emergency exits, which are clearly marked, easily accessible and easy to open at all times and under all circumstances. Escape routes must be marked and clear.

Fire alarms and fire extinguishers in sufficient numbers should be installed in every room so that they are easily visible and accessible, and workers should be instructed in their use and their function must be checked regularly.

For medical emergencies, at least one first aid kit should be installed within easy reach in each room, and at least one employee has been instructed in the handling and application of first aid measures.

Every employee must have access to clean drinking water at all times.

The sanitary facilities must take account of the number of employees, must be clean and quickly accessible, and should also be accessible during working hours.

None of these safety and hygiene measures should be charged to workers.

A worker who has moved away from a work situation from which he or she reasonably believed that there was an immediate and serious risk to life or health must not fear any repression or punitive measures.

Physical abuse, threats of physical abuse, unusual punishments and any mental or physical coercion, sexual or other harassment, intimidation and abuse by the employer are strictly prohibited.

8. environmental regulations

The manufacturing process must not have a negative impact on the local environment or on the standard of living of the local population.

This should be achieved in business decisions through the responsible use of natural resources, the introduction of a cleaner production process and measures to avoid waste and wastewater. The applicable legal regulations must be complied with.

9. employment relationship

Working relationships shall be legally binding, and all obligations to employees under labour or social security laws and regulations shall be respected.

Compliance with this Code of Conduct, national law and international guidelines must not be circumvented by the use of temporary work, subcontracting, fake training programmes or homeworking in industries where homeworking agreements have traditionally not been used. In addition, subcontracting requires the knowledge and consent of FC St. Pauli Merchandising.



Final provisions

All contractors, subcontractors and suppliers undertake to support and cooperate in the implementation and monitoring of this Code by:

- provide FC St. Pauli Merchandising with the relevant information about their activities.
- allow their workplaces and activities to be inspected at any time by recognised inspectors
- keep records of names, age, working time and wages paid for all workers and make these records available to recognised inspectors on request.
- inform the workers orally and in writing of the provisions of this Code; and
- refrain from disciplinary action, dismissal or other discrimination against employees who have disclosed information about compliance with this Code.

Contractors, subcontractors, suppliers and licensees who have been found to have violated one or more provisions of this Code of Conduct, lose the right to produce or organise the production of products for FC St. Pauli Merchandising.

The provisions of this Code represent only minimum standards and conditions and are aimed at eliminating exploitation. FC St. Pauli Merchandising does not and will not allow contractors, subcontractors and suppliers to use these minimum standards as maximum standards or as sole permitted conditions, or to use them as a basis for demands for labour standards or employment conditions.

Complaints procedure

Employees are entitled to report any violation of this Code and/or applicable law to FC St. Pauli Merchandising and/or any independent third party.

Employees and third parties can contact FC St. Pauli Merchandising at any time:

FC St. Pauli Merchandising GmbH & Co. KG
Harald-Stender-Platz 1
20359 Hamburg
socialcompliance@fcstpauli.com

(city, date)

(business partner)

(company name / stamp)