



GROHE

Supplier Code of Conduct



ENJOY WATER®



GROHE Supplier Code of Conduct

GROHE expects all of its employees to comply with the law and act ethically at all times and in all matters. We have the same expectations of our suppliers. Our Code of Business Conduct sets the basic standards for employee conduct. This Supplier Code of Business Conduct establishes related requirements for our suppliers.

This Code contains general requirements applicable to and expected from all GROHE suppliers. Particular supplier contracts may contain more specific provisions addressing some of the same issues. Nothing in this Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Code and any other provision of a particular contract, the other provision will prevail.





As a GROHE supplier you are expected to demonstrate clearly that you comply with all applicable national and international laws and regulations. This applies especially to the following requirements, but is not limited to:

Fair business conduct

A GROHE supplier's business conduct is based on integrity, trustworthiness and reliability.

Conflicts of Interest

All GROHE employees should act in the best interest of the company. Accordingly, employees should have no relationship (financial or otherwise) with any supplier that might conflict or appear to conflict with the employee's obligation to act in the best interest of GROHE (e.g. suppliers should not employ or otherwise make payments to any GROHE employee during the course of business between the supplier and GROHE). Friendships outside the course of business are acceptable, but suppliers should ensure that any personal relationship is not used to influence any GROHE employee's business judgment. If an employee of a GROHE supplier is a family relation (spouse, parent, child etc.) to a GROHE employee or if a supplier has any other personal relationship with a GROHE employee that might represent a conflict of interest, the supplier should disclose this fact to GROHE or ensure that the GROHE employee does so (this is the suppliers responsibility).



Anti Trust

As a GROHE supplier you do not share or exchange competitive information (e.g., price, cost) or undertake collusive conduct with any third party, supplier or bidder to GROHE.

Gifts, Meals and Entertainment

GROHE employees are prohibited from accepting anything more than modest gifts, meals and entertainment from suppliers. Ordinary business meals and small tokens of appreciation (e.g. confectionary at holiday time etc.) are acceptable, but suppliers should avoid offering GROHE employees any travel gifts, extensive entertainment or any other expensive gifts. Also, cash or cash equivalents, such as gift cards, are not acceptable to GROHE.

Business and Financial Records

Suppliers are expected to keep accurate records of all matters related to the business with GROHE. This includes proper recording of all expenses and payments. If GROHE is being charged for a supplier employee's time, accurate and complete time records must be kept. Suppliers should not delay submission of invoices or otherwise enable the shifting of expenses to a different accounting period.



Protecting Information and Property

Suppliers should respect others' patents, trademarks and property rights and protect it against loss or infringement. They should only use their business partners' property, especially GROHE property, for the purpose which it was provided for and protect it against damage and misuse.

Suppliers should protect confidential information related to GROHE and must not share it with anyone at any time unless authorized to do so by GROHE. Suppliers may not trade in securities or encourage others to do so, based on confidential information received from GROHE. If a supplier believes that access to confidential GROHE information has been granted by mistake, this supplier should immediately notify the related contact at GROHE and refrain from further distribution of such information, returning the information immediately.

Similarly, a supplier should not share information related to any other company with GROHE if the supplier is under a contractual or legal obligation not to do so.

Improper Payments

GROHE expects compliance with local laws and the Foreign Corrupt Practices Act (FCPA) dealing with any form of bribery from all of its suppliers. In connection with any transaction as a GROHE supplier or any transaction that otherwise involves GROHE, the supplier must not transfer anything of value, directly or indirectly to any third party or any third party employee in order to obtain improper benefits and/or advantages.



Working Conditions

Hiring practices should be in compliance with the International Labour Organization (ILO) and the Conventions of the United Nations (UN), especially concerning standards on forced labour (ILO C29, ILO C105), the minimum age (ILO C138) and child labour (ILO C182). Suppliers should provide fair and equal treatment and foster a culture of respect, tolerance and diversity (ILO C100, ILO C111). Moreover, they should provide safe, healthy and fair working conditions, fair working hours (ILO C1, C14) and wages and not tolerate any form of discrimination among their employees. Furthermore, suppliers' employees shall have the right to join workers' organizations without consequences and to elect their representatives, to organize their administration and activities and to formulate their programs and goals (ILO C87, ILO C98).

Environmental sustainability

All suppliers business conduct should be performed in a way that avoids negative effects regarding the environment and complies with applicable laws and regulations.

Disclosing Potential Misconduct (“whistleblowing”)

Suppliers who believe that an employee of GROHE, or anyone acting on behalf of GROHE, has engaged in illegal or otherwise improper conduct, should report the matter to the GROHE Compliance-Hotline, handled by the GROHE Ombudsman (Mr. J. Trahms, Attorney-at-Law, +49 172 6606610) or the GROHE Chief Compliance Officer (Mr. Hans-Juergen Zwarg, +49 175 5881480) under hans-juergen.zwarg@glaciertwo.lu.

A supplier's relationship with GROHE will not be affected by an honest report of potential misconduct.



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