

Code of Conduct

for business partners of the Cornelsen Group
(Supplier Code of Conduct)

Responsibility
in the supply
chain

Cornelsen Gruppe

Foreword and scope of application

The companies of the Cornelsen Group (hereinafter also referred to as "Cornelsen") are committed to compliance with the law, integrity, respect for human rights, fair working conditions and protection of the environment. The Cornelsen Group's human rights strategy is set out in the [Declaration of Principles](#). In addition to the [corporate values](#) set out in our Code of Conduct, it forms a fundamental building block of our ethical conduct.

The Code of Conduct for Business Partners defines the standards of conduct to be observed by our suppliers, service providers, sales partners and other partners (hereinafter referred to as "business partners").

Our business partners must also observe the human rights and environmental expectations contained in the Declaration of Principles. The expectations are set out and specified in more detail in this Code of Conduct for Business Partners.

Business partners are required to communicate the principles and rules set out in this Code of Conduct appropriately within their own company. In addition, the principles and rules as well as the human rights related and environmental expectations of the business partners must be addressed and passed on to their own business partners in an appropriate manner.

Our business partners can comply with the disclosure to their own employees and business partners by passing on their own rules of conduct, provided they meet the standards of this Code of Conduct.

The business partners shall inform and train their employees to an appropriate extent about the principles and rules set out below. They also cooperate with Cornelsen's training programs and risk assessment surveys.

Compliance with applicable laws

Our business partners comply with applicable laws and regulations in the countries in which

they operate. They must implement appropriate compliance measures to promote compliance with legal regulations in their own organization and among their business partners. Business partners must carefully select their own contractual partners, taking appropriate account of compliance standards.

Human rights and working conditions

Our business partners respect human rights. The standards for this are the UN Universal Declaration of Human Rights, the International Covenant of December 19, 1966 on Civil and Political Rights and the International Covenant of December 19, 1966 on Economic, Social and Cultural Rights. Human rights risks must always be reduced.

The requirements of the core labor standards of the International Labor Organization (ILO) must be complied with. In particular, the following principles must be observed:

- Elimination of forced labor
- Abolition of child labor
- Prohibition of discrimination in employment and occupation
- Occupational health and safety
- Freedom of association and the right to collective bargaining

Forced labor and child labor: Our business partners undertake not to accept or support any form of forced labor or child labor in their supply chain. The minimum age for employment must comply with national laws and the international standards of the ILO.

Discrimination: Our business partners create a working environment of appreciation, openness and respect. They do not discriminate against anyone on the basis of gender, age, national or social origin, skin color, disability, health status, sexual orientation, religion, ideology or other characteristics.

Working conditions and freedom of association: Our business partners ensure that their employees receive fair wages and that working hours are respected. The place of employment is decisive here. The business

partners ensure that their employees work under appropriate and safe working conditions and take measures to protect health and safety at work. The right to freedom of association and collective bargaining must always be respected.

Environmental protection

The applicable environmental protection regulations must be complied with. Business partners must prevent or reduce environmental risks.

The following agreements, among others, must be taken into account:

- Minamata Convention on Mercury of 2013
- Stockholm Convention on Persistent Organic Pollutants of 2001
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 1989

Resource efficiency: Our business partners promote sustainable practices and strive to minimize the consumption of energy and resources, reduce waste and minimize the environmental impact of their activities. Our business partners ensure that natural resources are used efficiently and conserved.

Environmental pollution: We expect our business partners to take measures to prevent environmental pollution. This also includes the safe handling of chemicals, waste management and the reduction of greenhouse gas emissions. Our business partners endeavor to regularly improve their own processes to protect the environment and assess environmental risks.

Corporate integrity and ethical business conduct

Anti-corruption: We do not tolerate corruption or other unethical and fraudulent business practices in our supply chains. Even the appearance of corruption must be avoided. Our business partners ensure that corruption does not take place in their companies or among

their own business partners. They ensure that benefits in a business context (gifts, invitations, sponsorships and donations, etc.) are handled responsibly. Personal benefits may never be offered, demanded, accepted or granted in return for influencing decisions. Our business partners are aware of the particular risks of benefits to public officials. They implement appropriate measures to reduce the risk of corruption.

Actual or potential conflicts of interest that are directly or indirectly related to the business relationship with Cornelsen must be avoided by the business partner and disclosed to Cornelsen.

Fair competition: We actively participate in the competition and aim to impress the market with our inspiring educational solutions. These are the result of free and fair competition between the best ideas and implementations. Our business partners comply with the rules of fair competition and avoid any anti-competitive behavior. No unlawful agreements restricting competition (e.g. on prices and price components, sales conditions and customer groups, sales strategies or strategic processes and data) are made. Likewise, no information relevant to competition is exchanged with third parties.

Protection of intellectual property and confidential information: Intellectual property rights must be respected and protected. This includes, for example, copyrights, patents, designs, trademarks and protected know-how. Business secrets are treated confidentially and must be protected from unauthorized access by third parties.

Data protection and information security: Our business partners comply with the applicable data protection regulations. They ensure the protection of personal data and only process personal data if there is a legal basis for doing so. The confidentiality, integrity and availability of personal data and sensitive information must be ensured by appropriate technical and organizational measures. Unauthorized access to data processing systems or malfunctions can

have serious consequences. Data must therefore be protected by appropriate measures.

Prevention of money laundering and transparent accounting: Our business partners adhere to the requirements for the prevention of money laundering. Only payments from legal sources are accepted. Regulations on financial reporting and proper accounting must be complied with.

Export control: Business partners observe customs and foreign trade regulations and comply with national and international sanction and embargo provisions.

Safety of products and services: The products and services of our business partners meet the applicable quality standards and safety regulations as well as all other regulatory requirements.

Cooperation and control

Binding nature: This Code of Conduct is binding for all business partners. If a business partner violates the rules described, Cornelsen reserves the right to take steps and remedial action depending on the severity of the violation. In the event of a justified suspicion of a serious violation, Cornelsen is entitled to terminate the business relationship for cause. In the event of violations of the rules mentioned here or if a particular human rights or environmental risk is identified, the business partner is obliged, at Cornelsen's request, to cooperate and develop an action plan in coordination with Cornelsen in order to remedy the identified violations and minimize risks.

Reporting violations: Our business partners are obliged to inform us immediately of any violations of the provisions of this Code of Conduct for Business Partners, insofar as these may be directly or indirectly related to the business relationship with Cornelsen. The business partner must also inform Cornelsen immediately of any serious human rights or environmental risks or violations within their own supply chain.

Whistleblower system: The Cornelsen Group encourages its business partners to create an open culture of discussion on compliance, integrity and ethical business behavior within their own company and among their own business partners. Information on possible violations of legal regulations and this Code of Conduct for Business Partners can be reported - anonymously if desired - via our [whistleblower system](#)

Complaints system: Information on human rights and environmental risks and violations can be reported at any time via our [complaints system](#) - anonymously if desired.

Controls and audits: Cornelsen is entitled to conduct audits and inspections of business partners in order to appropriately verify compliance with the Code of Conduct by our business partners. This also applies in the event of risks and possible violations of human rights or environmental protection regulations that have or could have an impact on the business relationship. Business partners must provide all necessary information and, where necessary, grant access to their business premises.

Audits shall take place during normal business hours and shall be announced with reasonable advance notice. When conducting the audit, the statutory provisions on data protection and the protection of business secrets must be complied with. Audits can also be carried out by external consultants who are bound to secrecy.

Cornelsen thanks its business partners for their cooperation and is always available to answer questions.

Further information can be found at:
<https://www.cornelsen.de/ueber-uns/lieferkette>

Contact Compliance Officer and Human Rights Officer:

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Links:

Code of Conduct:
<https://www.cornelsen.de/ueber-uns/unsere-verantwortung>

Policy statement:
<https://www.cornelsen.de/ueber-uns/lieferkette>

Whistleblower system:
<https://cornelsengruppe.integrityline.app/>

Complaints system:
<https://cornelsenlieferketten.integrityline.app/>

