



*Empowered lives.
Resilient nations.*

CODE OF CONDUCT

January, 2025

This Code of Conduct was commissioned by Noxy Deutschland GmbH under the project "Strengthening the corruption prevention and analysis functions of ethical responsibilities" implemented with the UNOPS operational directive.

Our Ethical Commitments

Introduction and Purpose

This Code of Conduct outlines the ethical principles and standards that guide our operations, relationships with stakeholders, and organisational culture. It is designed to foster transparency, accountability, and ethical behavior across all levels of our enterprise. This document applies to all employees, management, contractors, and anyone representing the company. It is aligned with the principles outlined in the *Human Resources, Ethics and Culture Operational Directive*.

Assumptions For a Persuasive Code of Conduct:

- Senior officials **support** the code and lead by example;
- Staff are **involved** in all stages of code development and implementation;
- Support mechanisms are in place to **encourage** the use of the code;
- Compliance with the **code** may be taken into account in relation to career progression and promotion;
- Compliance with the code is **monitored** regularly through appropriate verification means;
- Code of conduct and general corruption-**awareness** training is regular and comprehensive;
- The organization continually **promotes** its ethical culture;
- The code is enforced through **disciplinary** action when necessary;
- The code is regularly **reviewed** for currency, relevance and accessibility;
- The code is **devised** with a style and structure that meets the particular needs of their organization;
- The code becomes an **integral** aspect for influencing decisions, actions and attitudes in the workplace.

In Short:

- We **use** authority responsibly.
- We **act** with integrity & uphold UNOPS core values.
- We **use** authority responsibly.
- We **provide** equal opportunities & do not tolerate discrimination.
- We **treat** each other with dignity & respect & do not tolerate harassment.
- We **care** for each other's well-being, health, & safety.
- We **prevent** sexual exploitation & abuse.
- We **prevent** sexual harassment.
- We **remain** impartial, independent, & neutral.
- We **practise** prudence & responsibility in any public statements.
- We **protect** confidential information.
- We **use** artificial intelligence ethically.
- We **use** UNOPS resources responsibly.
- We **avoid** conflicts of interest.
- We **avoid** engaging in unauthorized outside activities.
- We **handle** gifts & entertainment responsibly.
- We **stand** against corruption in all its forms.
- We **protect** the environment & the people we serve.

ILO Standards and Implementation

Introduction

The International Labour Standards as established by the tripartite United Nations specialized agency, the International Labour Organization (ILO), have served as the foundation on which much of this Code of Conduct is based. It is the United Nations expectation that any supplier providing products or services to the United Nations will, in addition to the values of the United Nations Charter, adhere to the principles concerning International Labour Standards.

Scope of Application

This Code of Conduct outlines Noxy Deutschland GmbH's expectations for all registered suppliers and those with whom it conducts business. These principles apply to suppliers, their employees, parent, subsidiary, affiliate entities, and subcontractors. Suppliers must ensure this Code is communicated in a clear and understandable manner to all relevant parties. Compliance with this Code is a condition for supplier registration and doing business with Noxy Deutschland GmbH. Certain provisions will become binding if a supplier is awarded a contract, and non-compliance may affect eligibility for future contracts. Suppliers should review Noxy Deutschland GmbH's procurement policies and contract terms to confirm their eligibility.

Continuous Improvement

This Code of Conduct sets the minimum standards expected of suppliers to Noxy Deutschland GmbH. Suppliers are expected to strive to exceed both international and industry best practices and to promote these principles to their own suppliers and subcontractors. Noxy Deutschland GmbH recognizes that meeting these standards is an ongoing process and encourages suppliers to continually improve their workplace conditions.

Management, Monitoring and Evaluation

Noxy Deutschland GmbH expects its suppliers to set clear goals toward meeting the standards in this Code of Conduct. Suppliers should establish and maintain management systems to uphold these standards and regularly review, monitor, and adjust their operations to ensure compliance. Suppliers participating in the Global Compact are encouraged to implement its principles and report their progress annually to stakeholders.

TABLE OF CONTENTS

OUR PRINCIPLES

- Principle 1: Labour Standards.....
- Principle 2: Human Rights.....
- Principle 4: Equal Opportunity.....
- Principle 5: Climate, Environmental Management.....
- Principle 6: Health and Safety.....
- Principle 7: Quality Management.....
- Principle 8: Ethical Conduct.....
- Principle 9: Supply Chain.....

ACTION PLAN

- Training.....
- Legislature.....

Labour Standards

Freedom of Association and Collective Bargaining: Noxy Deutschland GmbH expects its suppliers to recognize the freely exercised right of workers, without distinction, to organize, further and defend their interests, and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities, and to bargain collectively.

Forced or Compulsory Labour: Noxy Deutschland GmbH expects its suppliers to prohibit forced or compulsory labour in all its forms.

Child Labour: Noxy Deutschland GmbH expects its suppliers not to employ:

(a) children below 14 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and

(b) persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons.

Wages, Working Hours, and Other Conditions of Work: Noxy Deutschland GmbH expects its suppliers to ensure the payment of wages in legal tender, at regular intervals no longer than one month, in full and directly to the workers concerned. Suppliers should keep an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations, or collective agreement, and suppliers should inform the workers concerned of such deductions at the time of each payment. The wages, hours of work, and other conditions of work provided by suppliers should be not less favourable than the best conditions prevailing locally (i.e., as contained in: (i) collective agreements covering a substantial proportion of employers and workers; (ii) arbitration awards; or (iii) applicable laws or regulations), for work of the same character performed in the trade or industry concerned in the area where work is carried out.

Overtime Policy: [...]

Employee Identification Documents and Age verification: Noxy Deutschland GmbH does not retain access to its employees' original identification documents and verifies legal age and identity of all employees in correspondence to laws and regulations. Suppliers must also implement procedures to verify the legal age and identity of all employees to prevent underage labour and ensure compliance with applicable laws.

Complaints System for labour Grievances: Noxy Deutschland GmbH expects its suppliers to maintain a confidential, transparent, and accessible system for employees to report labour-related grievances. This system should ensure prompt investigation, appropriate resolution, and protection from retaliation for those who raise concerns.

Human Rights

Human Rights: Noxy Deutschland GmbH expects its suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.

Harassment, Harsh or Inhumane Treatment: Noxy Deutschland GmbH expects its suppliers to create and maintain an environment that treats all employees with dignity and respect. Noxy Deutschland GmbH further expects that its suppliers, their parent, subsidiary, and affiliated entities as well as any subcontractors, will neither use or engage in, nor allow their employees or other persons engaged by them to use or engage in, any: threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse. Sexual exploitation and abuse violate universally recognized international legal norms and standards and have always been unacceptable behaviour and prohibited conduct for Noxy Deutschland GmbH. Prior to entering into agreements with Noxy Deutschland GmbH, suppliers are informed of the standards of conduct with respect to the prohibition of sexual exploitation and abuse, expected by Noxy Deutschland GmbH. Such standards include, but are not limited to, the prohibition of:

- (1) engaging in any sexual activity with any person under the age of 18, regardless of any laws of majority or consent,
- (2) exchanging any money, employment, goods, services, or other things of value, for sex, and/or
- (3) engaging in any sexual activity that is exploitive or degrading to any person.

Noxy Deutschland GmbH expects its suppliers to take all appropriate measures to prohibit their employees or other persons engaged by the suppliers from engaging in sexual exploitation and abuse. Noxy Deutschland GmbH also expects its suppliers to create and maintain an environment that prevents sexual exploitation and abuse. Contracts with Noxy Deutschland GmbH will contain provisions concerning a supplier's obligation to take appropriate measures to prevent sexual exploitation and abuse. The failure by a supplier to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof, or to take corrective action when sexual exploitation or abuse has occurred, constitute grounds for termination of any agreement with Noxy Deutschland GmbH. Moreover, no harsh or inhumane treatment, coercion, or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

Supply Chain Human Rights Risks: Noxy Deutschland GmbH expects its suppliers to assess and mitigate human rights risks within their operations and supply chain to prevent abusive practices.

Human Rights Remediation: Noxy Deutschland GmbH expects its suppliers to implement remediation programmes to address any adverse human rights impacts caused by their activities.

Employee Meetings and Freedom of Association: Noxy Deutschland GmbH expects suppliers to guarantee that workers can organize meetings without interference from management, in support of their rights to freedom of association.

Complaints System for Grievances (Human Rights Context): Noxy Deutschland GmbH expects its suppliers to establish a transparent and confidential complaints system to allow employees and other stakeholders to raise concerns related to human rights violations.

Equal Opportunities

Mines: Noxy Deutschland GmbH expects its suppliers not to engage in the sale or manufacture of anti-personnel mines or components utilized in the manufacture of anti-personnel mines.

Discrimination: Noxy Deutschland GmbH expects its suppliers to ensure equality of opportunity and treatment in respect of employment and occupation without discrimination on grounds of race, colour, sex, religion, political opinion, national extraction, or social origin, and such other ground as may be recognized under the national law of the country or countries where the performance, in whole or in part, of a contract takes place. Noxy Deutschland GmbH expects its suppliers to take all appropriate measures to ensure that neither themselves nor their parent, subsidiary, affiliate entities, or their subcontractors are engaged in any gender-based or other discriminatory employment practices, including those relating to recruitment, promotion, training, remuneration, and benefits.

Diversity Strategy and Inclusion: Noxy Deutschland GmbH expects its suppliers to promote a diverse workforce by encouraging hiring and retention of individuals from different backgrounds, ethnicities, genders, ages, religions, and abilities.

Leadership and Workforce Gender Balance: Noxy Deutschland GmbH expects its suppliers to strive for gender balance within both general and leadership roles, ensuring equal representation of women in key positions.

Disability Inclusion: Noxy Deutschland GmbH expects its suppliers to provide necessary adjustments to ensure the inclusion and employment of persons with disabilities, without imposing undue hardship on operations.

Harassment Reporting Mechanisms: Noxy Deutschland GmbH expects its suppliers to establish and maintain effective mechanisms for reporting, investigating, and addressing harassment, particularly sexual harassment, to maintain a safe and respectful work environment.

Climate and Environmental Management

Environment: Noxy Deutschland GmbH expects its suppliers to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should, wherever possible, support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility, and encourage the diffusion of environmentally friendly technologies by implementing sound life-cycle practices. We are committed to protecting the planet, combating climate change, conserving natural resources, halting biodiversity loss and preventing pollution. We strive to minimize our environmental footprint and committed to ensuring that UNOPS actions do not harm the communities we work with.

Chemical and Hazardous Materials: Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse, and disposal.

Wastewater and Solid Waste: Wastewater and solid waste generated from operations, industrial processes, and sanitation facilities are to be monitored, controlled, and treated as required prior to discharge or disposal.

Air Emissions: Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated from operations are to be characterized, monitored, controlled, and treated as required prior to discharge or disposal.

Minimize Waste, Maximize Recycling: Waste of all types, including water and energy, is to be reduced or eliminated at the source or by practices such as modifying production, maintenance, and facility processes, material substitution, conservation, recycling, and reusing materials.

Greenhouse Gas (GHG) Emission Reduction Targets: Noxy Deutschland GmbH expects its suppliers to set and work towards measurable targets to reduce their greenhouse gas emissions as part of climate change mitigation efforts

GHG Reduction Target Transparency: Noxy Deutschland GmbH expects its suppliers to publicly disclose their greenhouse gas reduction targets and implementation plans to promote transparency and accountability

Understanding of Climate Footprint: Noxy Deutschland GmbH expects its suppliers to understand and monitor their climate footprint, including emissions across Scopes **1** (direct emissions), **2** (energy-related), and **3** (supply chain emissions) in accordance with global standards.

Energy Consumption Reduction Measures: Noxy Deutschland GmbH expects its suppliers to implement systems to track and reduce their energy consumption to preserve natural resources.

Pollutant Measurement and Control: Noxy Deutschland GmbH expects suppliers to monitor and control harmful pollutants such as sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon monoxide (CO), which can result from fuel combustion and industrial processes.

Environmental Management System: Noxy Deutschland GmbH expects its suppliers to have a documented environmental management system that sets goals and tracks progress in reducing their environmental impact.

Health and Safety of Employees

Noxy Deutschland GmbH expects its suppliers to ensure, so far as is reasonably practicable, that:

- (a) the workplaces, machinery, equipment, and processes under their control are safe and without risk to health;
- (b) the chemical, physical, and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and
- (c) where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or adverse effects to health.

We ensure that the health, well-being, security, and lives of UNOPS personnel will not be subject to undue risk. We look out for our own and each other's physical and mental well-being, health, and safety. We ensure a safe and healthy work environment, free from occupational health and safety hazards or injuries. We observe all applicable health and safety instructions.

Many conditions can compromise well-being and safety at work, including the following:

- (a) Fatal hazards including working at height, excavations, mobile equipment, confined spaces, handling hazardous substances and working with electricity;
- (b) Infectious hazards, such as COVID-19, lack of supplies or inadequate use of personal protective equipment;
- (c) Unsafe behaviour while being under the influence of alcohol or drugs;
- (d) Poor workstation ergonomics (e.g., keyboard, chair, lighting, noise);
- (e) Psychosocial hazards from work arrangements, relationships, inappropriate or abusive behaviours, poor communication, physical violence, etc.; and
- (f) Domestic violence.

Health & Safety Management System and Risk : Noxy Deutschland GmbH expects suppliers to implement a formal health and safety management system that includes documented processes to assess, monitor, and control health and safety risks

Health & Safety Risk Assessments: Suppliers must regularly conduct risk assessments to identify workplace hazards and evaluate their likelihood and severity. This includes implementing measures to control risks that cannot be eliminated.

Health and Safety Training: Suppliers are expected to provide regular training to all employees on health and safety protocols relevant to their roles. Training should be up-to-date and practical to ensure that workers are aware of how to operate safely and mitigate risks.

Accident Investigations: Noxy Deutschland GmbH expects suppliers to investigate workplace accidents or incidents to identify their root causes, document findings, and implement corrective actions to prevent future occurrences.

First Aid Training and Preparedness: Suppliers must ensure that employees are trained in first aid and that an adequate number of trained personnel are present on-site at all times. First aid kits and procedures should be readily available.

Health and Safety of Employees

Emergency Evacuation Drills: Suppliers should conduct regular emergency evacuation drills to prepare employees for potential emergencies. This helps ensure readiness and familiarization with emergency protocols.

Firefighting Equipment Maintenance: Noxy Deutschland GmbH expects suppliers to provide and maintain functional firefighting equipment, such as fire extinguishers, fire alarms, and suppression systems. Regular checks and maintenance of this equipment are required.

Visitor Safety Management: Suppliers must have procedures to ensure the safety of visitors and contractors who access their facilities. This includes providing information on health and safety risks, as well as any necessary protective equipment.

Alcohol and Drug Policy (Already mentioned but should be highlighted): Suppliers must ensure that employees do not perform work under the influence of alcohol or drugs, which may compromise workplace safety.

Quality Management

Noxy Deutschland GmbH is dedicated to ensuring that all products and services meet the highest standards of quality, reliability, and safety. To achieve this, Noxy Deutschland GmbH and its suppliers must work collaboratively under a framework of continuous improvement, compliance with recognized standards, and transparent communication.

Quality Management Policy: Noxy Deutschland GmbH will define and communicate clear quality expectations across all operations and procurement activities. Suppliers are required to implement a formal quality management policy that outlines their commitment to delivering products and services that meet agreed quality standards. This policy must be endorsed by senior management and disseminated throughout their organization.

Quality Management System: Noxy Deutschland GmbH will maintain its internal quality management system (QMS) aligned with industry best practices. Suppliers must also establish and maintain a documented QMS with procedures to monitor, control, and continuously improve their processes. The system should comply with internationally recognized standards, such as ISO 9001, to ensure consistency and compliance.

Continuous Improvement: Noxy Deutschland GmbH will collaborate with suppliers by providing feedback, sharing best practices, and facilitating opportunities for improvement. Suppliers must proactively identify and address opportunities to enhance their processes, reduce defects, and optimize service or product delivery.

Quality Inspections and Audits: Noxy Deutschland GmbH will conduct regular audits and assessments to verify supplier compliance with quality standards. Suppliers are expected to perform regular internal inspections and accommodate external audits to ensure that their operations align with contractual and regulatory quality requirements.

Quality Control Measures: Noxy Deutschland GmbH will monitor supplier performance using key performance indicators (KPIs) and other data-driven methods. Suppliers must implement robust quality control processes, including testing, validation, and documentation, to ensure that all deliverables meet the required specifications. Suppliers should promptly address any quality concerns or defects and take corrective action.

Output Evaluation: Both Noxy Deutschland GmbH and its suppliers will evaluate the effectiveness of their quality processes through regular performance reviews. Suppliers must assess their outputs to detect and resolve potential risks, inefficiencies, or non-conformities, ensuring the consistent delivery of high-quality products and services.

Corrective Actions: In the case of non-compliance, Noxy Deutschland GmbH will work with suppliers to develop and implement corrective action plans. Suppliers are expected to cooperate fully, promptly addressing the root cause of the issue and taking steps to prevent recurrence.

Transparency and Communication: Noxy Deutschland GmbH will maintain open communication with suppliers regarding quality expectations and performance. Suppliers must provide timely updates on quality matters, including any incidents that could affect product or service delivery. Both parties commit to transparency in reporting and addressing any quality-related issues.

Ethical Conduct

Corruption: Noxy Deutschland GmbH expects its suppliers to adhere to the highest standards of moral and ethical conduct, to respect local laws, and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

Conflict of Interest: Noxy Deutschland GmbH suppliers are expected to disclose any situation that may appear as a conflict of interest and notify Noxy Deutschland GmbH if any of its officials or professionals under contract may have an interest in the supplier's business or any kind of economic ties with the supplier.

Gifts and Hospitality: Noxy Deutschland GmbH has a “zero tolerance” policy and does not accept any type of gift or offer of hospitality. Noxy Deutschland GmbH will not accept invitations to sporting or cultural events, offers of holidays or recreational trips, transportation, or invitations to lunches or dinners. Suppliers are expected not to offer any benefit, such as free goods or services, employment, or sales opportunities, to Noxy Deutschland GmbH staff to facilitate business with the company.

Post-employment Restrictions: Post-employment restrictions may apply to Noxy Deutschland GmbH staff in service and former staff members who participated in the procurement process if such persons had prior professional dealings with suppliers. Noxy Deutschland GmbH suppliers are expected to refrain from offering employment to any such person for a period of one year following their separation from service.

Supply Chain

Supplier Code of Conduct Communication: Noxy Deutschland GmbH expects its suppliers to communicate the Code of Conduct and associated policies to their subcontractors and other supply chain partners. Noxy Deutschland GmbH will provide resources, including access to training materials and compliance guidelines, to support the dissemination of these principles throughout the supplier network.

Sustainability Risk Assessment: Suppliers are expected to regularly assess and mitigate potential social, environmental, and ethical risks within their operations and supply chains. Noxy Deutschland GmbH will collaborate with suppliers to identify risks through joint assessments and audits. We will support suppliers in implementing risk mitigation strategies where necessary.

Supplier Performance Review: Noxy Deutschland GmbH will periodically review supplier performance to ensure adherence to ethical and sustainability standards. Suppliers are expected to provide relevant information and cooperate fully with these reviews. Noxy Deutschland GmbH will offer constructive feedback and support to help suppliers improve their practices and compliance where required.

Material Origin and Supply Chain Transparency: Noxy Deutschland GmbH requires suppliers to verify and disclose the origins of materials they source, ensuring compliance with responsible sourcing policies (e.g., conflict minerals avoidance). Noxy Deutschland GmbH will work with suppliers to enhance transparency and traceability across the supply chain, supporting adherence to international sustainability standards.

Supplier Engagement on Sustainability Initiatives: Suppliers are expected to consider the social impact of their operations on local communities by prioritizing local employment and avoiding harm to cultural heritage and social structures. Noxy Deutschland GmbH will monitor community engagement initiatives and encourage suppliers to take active roles in social responsibility projects.

Training

Goals of Training: Noxy Deutschland GmbH aims to educate its stakeholders, including employees, suppliers, and contractors, on ethics, compliance, and sustainability. The company seeks to prevent ethical violations such as corruption, harassment, and discrimination. Additionally, Noxy Deutschland GmbH prioritizes adherence to international labour, human rights, and environmental standards while fostering continuous learning and improvement.

Content of Training: Noxy Deutschland GmbH's training program covers key areas such as the Code of Conduct, including ethics, conflict of interest management, and reporting mechanisms. Health and safety protocols focus on risk prevention, emergency preparedness, and the use of personal protective equipment (PPE). Anti-corruption measures, such as bribery prevention and the handling of gifts, are emphasized. Training also includes labour and human rights standards, with a focus on non-discrimination, child and forced labour prohibition, and the protection of workers' rights. Environmental management training highlights waste reduction, pollution control, and achieving sustainability goals, such as greenhouse gas emission targets.

Medium of Training: Noxy Deutschland GmbH conducts regular training sessions on an annual or semi-annual basis. The program includes role-specific modules to ensure relevance to various job functions. Training is delivered through a blend of e-learning and interactive workshops. The company actively involves suppliers in training and ensures leadership participation to demonstrate commitment. Post-training assessments, performance tracking, and regular evaluations help Noxy Deutschland GmbH measure the program's impact and effectiveness.

Legislature

In the context of the Action Plan, for Noxy Deutschland GmbH, Legislature refers to the regulatory and legal framework that governs and enforces adherence to the Code of Conduct, ethical standards, and organizational policies. Specifically, it encompasses:

- (a) Signing or Acknowledging the Code:** Suppliers are expected to acknowledge that the Code of Conduct establishes the minimum standards for doing business with the organization. This acknowledgment is often a requirement for supplier registration or eligibility to secure contracts.
- (b) Communication of Policies:** The Code must be communicated to employees, subcontractors, and affiliated entities in a language and format that is easily understandable.
- (c) Binding Obligations:** Certain provisions of the Code become binding upon suppliers when awarded a contract. Non-compliance with these provisions can affect future contract eligibility.
- (d) Monitoring and Compliance Verification:** Suppliers are required to have systems for regularly reviewing and ensuring compliance with the Code. This includes self-assessments, audits, and maintaining appropriate management systems.
- (e) Continuous Improvement:** Suppliers are encouraged to exceed minimum standards and improve workplace conditions continually, striving for both international and industry best practices.