



**PROJEKT SPIELBERG GMBH & CO KG**

# **CODE OF CONDUCT FOR BUSINESS PARTNERS**

**NOVEMBER 2022**



# **FOREWORD**

Dear Sir or Madame,

Sustainability starts small and has to be continued on a large scale. The Red Bull Ring is aware of the responsibility, that stems from its prominence as well as its media presence on a regional, national and international level.

As a company, we take this responsibility seriously and aim to continuously pursue appropriate steps to align our business goals with ecological and social aspects.

To promote this attitude and generate impact on a larger scale, it is essential that not only our business but also our suppliers and service providers comply with certain minimum standards set by the Red Bull Ring.

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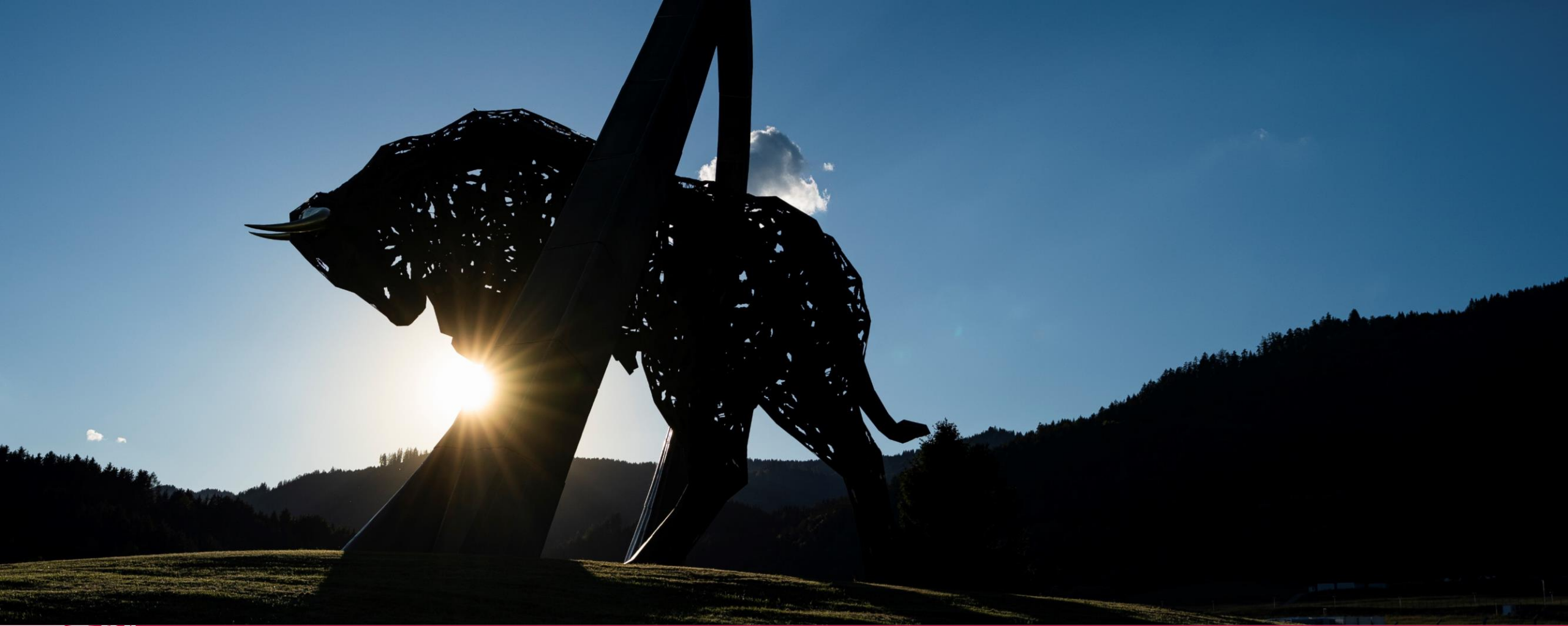
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**WHAT WE STAND FOR**  
**OUR FUNDAMENTALS**





# MOTIVATION

## FUNDAMENTALS

We, Projekt Spielberg GmbH & Co KG and its affiliated companies (hereinafter referred to as "Projekt Spielberg"), are committed to compliance with current legal regulations, social responsibility, environmental protection and fair cooperation as the guiding principles of our actions. Our goal is to establish a balance between our economic, environmental and social responsibility. This is only feasible by working with our direct suppliers and their affiliates, agents and representatives (hereinafter jointly referred to as "Partners").





## FUNDAMENTALS

# SCOPE & COOPERATION

“We jointly adhere to this Code of Conduct”

This Code of Conduct forms the basis of all business relationships with Projekt Spielberg and applies to our partners as well as to Projekt Spielberg itself (hereinafter collectively referred to as "we").





## FUNDAMENTALS

# SUPPLIERS

“We only do business with partners who share the same principles”

Partners accept the following and are responsible for complying with the principles. Partners shall also inform their suppliers of goods and services (hereinafter referred to as "Suppliers") of all principles and requirements described herein and require their suppliers to comply with and share them throughout their supply chain. Partners take this Code of Conduct into account when selecting their suppliers.





## FUNDAMENTALS

# LAWS & REGULATIONS

“We comply with the laws, regulations and social standards of the respective country”

Partners must recognize and comply with all current laws, rules and regulations, including but not limited to permits, working conditions, wages, employee health and safety, human rights, environment, climate, and supply chain due diligence.





# **PRINCIPLES**

## **FUNDAMENTALS**

*“We are guided by existing fundamental principles”*

This Code of Conduct is based on the fundamental principles as defined in the Business Social Compliance Initiative (BSCI), the conventions of International Labour Organization (ILO), the United Nations Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, the UN Conventions on the Elimination of All Forms of Discrimination, the principles of the UN Global Compact and the OECD guidelines for multinational enterprises.



## FUNDAMENTALS

# LEVEL OF AMBITION

“We are always interested in increasing our ambition level”

The principles set out in this Code of Conduct are to be considered as minimum standards. Where required by current laws and regulations, higher standards must be met and adhered to. Partners can also introduce higher standards at any time.







**WHAT WE EXPECT**

**COMPLIANCE WITH THE CODE OF CONDUCT**





# TARGET GROUP & MONITORING

“All employees, as well as business partners shall comply with the policy”

Partners ensure enforcement of the principles defined in this Code of Conduct throughout their organization as well as throughout their supply chain.

To comply with and monitor these principles, partners establish a management system that includes clear responsibilities and procedures, ongoing monitoring and documentation.



# AUDITING

## COMPLIANCE WITH THE CODE OF CONDUCT

“We work transparently and collaboratively”

Projekt Spielberg or third parties authorized by Projekt Spielberg (who are subject to a confidentiality obligation) are entitled – after prior notice – to verify compliance with this Code of Conduct at the premises of the partners. To this end, partners undertake to name the production sites accordingly and to grant access to relevant documents. Projekt Spielberg will treat the information received under this clause confidentially but may share it with customers and authorities upon request if necessary to comply with legal or contractual obligations.





## COMPLIANCE WITH THE CODE OF CONDUCT

# AVAILABILITY

*“The Code of Conduct is accessible to everyone”*

The content of this Code of Conduct must be freely accessible to all employees of the partners. It must also be ensured that every employee fully understands the content of this Code of Conduct.







# **SUPPORT & INFRINGEMENTS**

## **COMPLIANCE WITH THE CODE OF CONDUCT**

*“We work on open and transparent communication”*

We support open and transparent communication and encourage our partners to engage in dialogue with us. In case of queries, doubts and ambiguities, we serve as contact person to assist you for advice. For this, please reach out to your contact person.

If violations of this Code of Conduct are detected, partners are obliged to take immediate corrective action and inform Projekt Spielberg thereof. Any report or concern will not be criticized or punished in any way.

An examination decides on the next steps.

Projekt Spielberg is entitled to terminate the business relationship with partners if they violate the principles of this Code of Conduct.





**WHAT SHAPES THE WAY WE WORK**  
**OUR CODE OF CONDUCT**





## COOPERATION

# RESPECTFUL INTERACTION

*“Respect, dignity and fairness shape our behavior”*

Partners may only take disciplinary action permitted by law. Partners must treat all employees with respect, dignity and fairness.

No employee may be subjected to physical, psychological, sexual or verbal abuse or harassment. Partners shall not use corporal punishment, violence or intimidation against employees.





## COOPERATION

# DISCRIMINATION

“We do not tolerate discrimination and work towards equal opportunities”

Partners must under no circumstances discriminate against employees, such as hiring, salary, benefits, promotion, disciplinary action, termination of employment or retirement, based on gender, race, color, religion, caste, age, disability, sexual orientation, maternity or marital status, nationality, political opinion, trade union membership, or social or ethnic origin.







# **BRIBERY & CORRUPTION**

## **COOPERATION**

*“We reject bribery and corruption”*

Partners comply with all current anti-corruption and anti-bribery laws. Partners reject any form of corruption or bribery and do not participate directly or indirectly in any way. Moreover, they will not offer, grant or promise anything of value to public officials or other parties in the private sector to influence official business or obtain an unfair advantage.

Partners shall notify Projekt Spielberg as soon as they become aware of any violations of these assurances and shall cooperate fully with Projekt Spielberg in investigating the matter.



# **SPONSORING & GIFTS**

## **COOPERATION**

*“We use sponsorship and gifts solely for promotional purposes and to enhance reputation”*

Partners do not expect anything in return for gifts or sponsorship. No economic purpose is pursued. Sponsorship is used exclusively for advertising purposes and to increase the reputation of the company. Sponsorship primarily serves to reinforce the positive public image of the company.

Partners ensure that all employees are aware of internal communication and escalation channels regarding issues relating to sponsorship and gifts.

For sponsoring at the Spielberg Ring, the contractually stipulated conditions apply.





# ***DIGITISATION***

## **COOPERATION**

*"We treat data conscientious and confidentially"*

Partners use personal data only to the extent permitted by law. Furthermore, data for internal use will be treated confidentially and will not be made publicly accessible under any circumstances.

Data must be used responsibly. Partners are obliged to keep all data (of employees and customers) secure and to protect it from access by third parties.

Partners ensure that all employees are aware of the relevant regulations and have the necessary means at hand to implement them and act accordingly. This includes training to raise awareness and escalate paths in the event of unwanted data disclosures or attacks on master data.

# SOCIAL MEDIA

## COOPERATION

“We maintain a respectful and responsible approach to social media”

Partners use social media (such as Facebook, LinkedIn, Instagram, TikTok) responsibly and put tolerance and respect first. Partners protect the privacy of employees, customers and the company.

Contributions that endanger the company will not be tolerated in any way.

Partners take a clear position against contributions that violate the dignity of a human being.

No insulting, violence-glorifying or discriminatory publications are tolerated.







# **FORCED LABOUR**

## **HUMAN RIGHTS & SOCIAL RESPONSIBILITY**

*“Respect, dignity and fairness shape our behavior”*

Partners do not tolerate any form of forced or compulsory labor, serfdom, modern slavery or similar working conditions and implement appropriate safeguards against ill-treatment of persons in their area of business. Partners must not require their employees to deposit original IDs, travel documents or other important documents as a condition of employment.

Partners must allow each employee to terminate their employment relationship after a reasonable and agreed notice period, or at least after the statutory notice period.

Partners may not withhold wages in whole or in part in order to put pressure on employees to continue their employment.





# **CHILD LABOUR**

## **HUMAN RIGHTS & SOCIAL RESPONSIBILITY**

*“We pay attention to the age of our employees”*

Partners do not tolerate child labor. The minimum age for recruitment must not be less than 15 years or the legal age, whichever is higher.

Compliance with all laws applicable to the employment of young employees regarding restrictions on dangerous, unsafe and unhealthy activities, working hours, wages, working conditions and related documentation must be ensured and available upon request.

Partners must have written hiring policies and employee age verification systems. Likewise, appropriate and reliable proof of age must be kept for all employees.





# **FREEDOM OF ASSOCIATION**

## **HUMAN RIGHTS & SOCIAL RESPONSIBILITY**

*"We do not prevent anyone from joining unions"*

Partners respect and acknowledge the right of workers to legally form and join trade unions or associations of their choice and to bargain collectively.

If the law prohibits formal unions in the partner's country, partners promote a parallel independent mechanism that allows employees to organize and bargain collectively.

Partners do not expose employees to discrimination, harassment, intimidation, punishment or other threats to limit or impede their right to join an association.

Partners may not directly or indirectly expose their employees to coercion or influence not to join a particular union.





# ENVIRONMENTAL PROTECTION

## SUSTAINABILITY & ENVIRONMENTAL RESPONSIBILITY

„Our aim is to protect the environment“

Partners comply with all current environmental regulations, laws and provisions. Partners should reduce waste to a minimum and recycle as much as possible to protect and preserve nature and the environment.

Partners must dispose of all waste, by-products and hazardous pollutants in an environmentally sound manner. If required by the processes used, partners must have a waste, emission and/or wastewater treatment facility that complies with current laws.

Partners provide Projekt Spielberg upon request with information reasonably available to them on the impact of the partner's operations on the environment and climate change.

In particular, the relevant information resulting from the direct business relationship with Projekt Spielberg must be made available.





# REMUNERATION AND BENEFITS

## LEGAL REQUIREMENTS

*“We align remuneration at a minimum of the statutory provisions”*

Overtime pay for piecework, paid annual leave, public holidays and other leave such as maternity leave, sick leave, etc., as well as bonus, pension and retirement benefits, must comply with legal requirements. If there are no relevant legal requirements, the supplement will be calculated in a manner that corresponds to the statutory overtime surcharge rate for permanent employees.

Partners must keep all documents for inspection that are required by law for employees (including temporary workers) (e.g., payroll accounting in the legally prescribed form).

Partners will make reasonable efforts not to employ temporary workers, interns or apprentices in order to avoid the payment of certain additional benefits that may have to be granted to regular employees.



# WORKING HOURS

## LEGAL REQUIREMENTS

“We pay attention to the time workload of our employees”

Working hours (including overtime/night shifts) must comply with current law, industry standards or relevant ILO conventions, whichever is more stringent. In countries where the law restricts overtime, partners must follow local laws. Notwithstanding local regulations, partners may not require employees to regularly work more than 60 hours per week, including overtime, especially with respect to pregnant or young employees.

Overtime must be worked exclusively on a voluntary base. Employees must have the right to refuse to work overtime without threat of sanctions.

Breastfeeding mothers must be given adequate breaks – without any deductions – to feed their children. Pregnant employees must be given appropriate breaks.





# HEALTH & SAFETY

## LEGAL REQUIREMENTS

*“We pay attention to the well-being of our employees”*

Partners must comply with all current regulations in their country regarding health and safety at work and in their residential facilities, insofar as they make them available to their employees.

Partners should improve workflows to ensure healthy, decent and productive working conditions, such as adequate lighting, air circulation, ventilation, heating/cooling of the workplace.

Partners mark hazardous materials and store them in safe, protected, separate and ventilated areas. Partners provide employees with a list of all hazardous substances used in the facility/workplace, including appropriate first aid measures.

Partners must have procedures in place to ensure that pregnant employees do not have to perform tasks that may be unsafe or too stressful for them.



# WORKPLACE & SAFETY

## LEGAL REQUIREMENTS

“All workstations are also equipped for emergencies”

The workplace must have clearly marked exits for the emergency evacuation of employees as well as suitable fire detectors and fire extinguishers (freely accessible and maintenance documented). Evacuation routes must be posted in all work areas. Evacuation assembly points must be clearly marked. All escape doors must remain unlocked, and corridors, exits and stairs must be free of any obstacles during working hours so that evacuation is possible in the event of an emergency. All corridors, exits and stairwells must be equipped with emergency lighting.

Partners must have trained employees in handling emergency equipment, such as fire extinguishers. The training must take place at least once a year for each shift.

Employees may not stay in a high-noise area for more than the maximum time permitted by local regulations. Partners must comply with all current laws and regulations regarding noise levels in the workplace.





# DRINKING WATER & HYGIENE

## OTHER REQUIREMENTS

“Drinking water is provided to all employees “

Partners must provide all employees with clean drinking water to which they have adequate access throughout the working day. The workplace must have enough clean toilets/sanitary facilities (separated by gender) with running water for all employees. These facilities must be accessible throughout the day.

Existing company canteens and break rooms must be kept clean to ensure hygiene and comfort.



# ACCOMMODATIONS

## OTHER REQUIREMENTS

*"We offer our employees decent accommodation"*

Any existing accommodation must comply with all current laws and regulations regarding safety, health and hygiene, safety against fire and accidents due to electrical, mechanical and structural defects.

Accommodations must have sufficient living space for each employee, personal storage space, adequate ventilation, room cooling/heating systems/fans, adequate lighting, drinking water, cooking facilities, basic first aid equipment and required fire extinguishers, emergency lighting, emergency exits, clean toilets with running water, and single beds. Accommodations must be offered separately by gender. The inhabitants must be able to determine their comings and goings in an appropriate manner.



*THANK YOU*

