

# Code of Conduct for Business Partners

## PohlCon

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## Introduction

Dear Business Partners,

PohlCon GmbH, together with its subsidiaries - (hereinafter collectively referred to as "PohlCon") would like to establish a common basic understanding of social responsibility and ethical corporate management with this Code of Conduct for its business partners.

Compliance with the law is of the utmost importance to PohlCon. Breaches of the law present a high risk, as they can result in fines, penalties, damages and a tarnished reputation.

At PohlCon, we hold ourselves to high standards. But we also expect our business partners to behave in a legally compliant and ethically sound manner. For the purposes of this Code of Conduct, business partners are all third parties who work for, on behalf of, or together with PohlCon. This applies in particular to suppliers, service providers, sub-contractors and other contractual partners of PohlCon.

This Code of Conduct sets out the framework for working with our business partners. It sets out the requirements we expect our business partners to fulfil, and forms an integral part of the business relationship.

Our business partners are required to communicate the values and principles contained in this Code of Conduct within their own organisations and to take appropriate measures (e.g. training and monitoring) to ensure that they are complied with. We expect our business partners to communicate these principles to their own suppliers and business partners in an appropriate manner and to take appropriate measures to ensure that they are complied with. This can also be done by means of an equivalent code of conduct of their own. Business partners shall exercise due diligence in the selection of their own business partners, taking into account the values and principles set out in this document.

PohlCon reserves the right to verify compliance with the requirements of this Code of Conduct by its business partners after prior announcement in a reasonable manner, taking into account applicable law. In the event of a breach of the Code of Conduct, PohlCon reserves the right to take measures up to and including extraordinary termination of the business relationship, depending on the severity of the breach.

## A. Principles

### I. Adherence to the law and compliance principles

Our business partners are to ensure compliance with all applicable statutory regulations in all business operations. The following principles also reflect the key principles that guide our business conduct, and which we also expect our business partners to observe. The key compliance principles are:

#### 1. Fair competition

PohlCon is committed to fair competition and the free development of all participants in the market. Our business partners are also expected to respect the principles of fair and open competition. They are to act in accordance with national and international competition and antitrust laws. Agreements of any kind with competitors on prices, terms and conditions, market allocation and non-competition are prohibited.

#### 2. Prevention of corruption

Our business partners do not engage in corruption, bribery or any form of extortion. The business relationships of our business partners are based on objective criteria in order to maintain their integrity as reliable and competitive business partners, not only with PohlCon. Our business partners do not influence or distort competition through corruption-related payments, nor do they make any such

attempts. Furthermore, business matters are never to be influenced by personal interests or considerations. Business partners are to report any possible conflicts of interest to PohlCon.

### 3. Prevention of money laundering

PohlCon does not tolerate any activities related to money laundering. It is the responsibility of our business partners to be vigilant and to prevent transactions that could potentially expose themselves or PohlCon to the suspicion of money laundering. We expect them to detect and report such suspicious transactions or activities.

### 4. Data privacy, confidentiality and protecting third-party rights

All personal data relating to employees, clients, business partners and other third parties are to be treated confidentially and processed in accordance with applicable national and international data protection laws.

Our business partners are aware of their obligation to maintain the confidentiality of business and proprietary information as part of their business relationship with PohlCon. This includes, but is not limited to, trade secrets, business documents and business records. Information is to be stored properly and protected from unauthorised access by third parties.

Our business partners are required to respect the valid intellectual property rights of third parties (e.g. patents, copyrights and trademarks). No unauthorised use is to take place.

### 5. Financial integrity

All business records that PohlCon compiles, publishes and, in particular, makes available to the competent authorities, shareholders and creditors must be complete in accordance with the applicable accounting principles. All financial records must be prepared accurately and in a timely fashion by employees in accordance with their duties and areas of responsibility and in compliance with applicable laws and regulations. We also expect this of our business partners.

### 6. Export controls

PohlCon attaches great importance to compliance with foreign trade regulations. Our business partners comply with applicable import and export regulations as well as regulations on sanctions and embargoes.

## II. Human rights, anti-discrimination, labour and health and safety rights

### 1. Human rights

Respect for internationally recognised human rights by our business partners is a basic prerequisite for working with PohlCon. Our business partners comply with ILO core labour standards and respect the dignity, privacy and personal rights of every individual.

Our business partners do not tolerate behaviour, whether verbal or physical, that is disrespectful or humiliating to a person. They treat employees fairly and without prejudice, and do not tolerate abuse, bullying or harassment of any kind. Our business partners have no tolerance for any form of forced, compulsory, or child labour.

### 2. Anti-discrimination, equal opportunity and diversity

Our business partners reject all forms of discrimination and are expressly committed to equal opportunity. They treat all people equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

### 3. Occupational health and safety

Our business partners are committed to providing a healthy and safe working environment. For them, occupational health and safety is of the highest priority in the company. Their goal should be to reduce workplace accidents to zero. Our business partners create the necessary conditions to ensure the safety of their employees and third parties and comply with applicable labour, accident prevention and health regulations.

## III. Environmental protection, climate protection, and sustainability

We expect our business partners to be constantly improving the sustainability of their products and services in order to fulfil our commitment to environmentally oriented management.

Furthermore, they are to take appropriate measures and act in accordance with applicable environmental protection laws. We expect them to act in line with international standards in order to minimise negative impacts on the environment.

We reject the use of conflict materials such as rare earths and ores from conflict zones.

## B. Obligation to report

Our business partners shall undertake to inform PohlCon without delay if they suspect a breach of the law or a violation of this Code of Conduct by their own employees or business partners, and to assist with clarifying the facts.

We also encourage our business partners to foster a culture of open dialogue within their own business and with their own business partners.



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