

I. General Principles, Laws and Statutes

Polymer-Technik Elbe GmbH (PTE) is committed to uphold its social responsibility in all business dealings.

PTE is committed to respecting the applicable laws and any other applicable provisions in the countries where it is active in all their business activities and decisions. Business partners are to be treated fairly. Contracts are to be upheld, and changes in the framework of the business environment are to be taken into consideration.

II. Ethical Responsibility

Corruption and Conflicts of Interests

In dealing with business partners (customers, suppliers) and state institutions, the interests of the company and the private interests of employees on both sides are to be kept strictly separate. Actions and decisions are to proceed independent of considerations which do not concern the business at hand, and which involve personal interests. Current anti-corruption criminal law is to be upheld. Amongst other things, the following is to be observed:

- The granting of personal advantages (benefits in kind such as payments and loans, including the giving of smaller gifts over a longer period of time) by PTE and its employees to public officials (such as civil servants or public employees) with the objective of gaining advantages for the signing/acceding company or oneself or for third parties, is not permitted.
- Personal benefits in kind in exchange for a favoured position in business dealings may not be offered, promised, granted, or approved, nor may personal benefits be demanded or accepted in dealings with business partners. PTE must require from its employees that they will not allow any such benefits to be promised to them. The management and employees of PTE are not allowed to offer, promise, demand, give or accept gifts, payments, invitations, or services in business dealings that are provided with the aim of influencing a business relationship in a prohibited way or which risk jeopardising the professional independence of the business partner. This does not generally apply to gifts and invitations that fall within the bounds of normal business practice regarding hospitality, convention, and courtesy.
- Compensatory secondary employment may only be taken up with the express prior consent of the responsible HR department. If employees of PTE are in a situation where a conflict of interest exists or are uncertain whether a conflict of interest exists or could arise, the management should be consulted.

Antitrust Law (Conduct vis-à-vis Competitors)

PTE respects fair competition and this adheres to applicable laws that protect and promote competition, in particular the prevailing antitrust laws as well as laws that regulate competition.

In dealing with competitors, the provisions prohibit collusion and other activities aimed at influencing prices or conditions, dividing up sales territories or customers or using prohibitive means to inhibit free and open competition.

Furthermore, these provisions prohibit agreements between customers and suppliers by which customers are to be limited in their freedom to autonomously determine their pricing and other conditions when reselling (determination of pricing and conditions).

Given the fact that it can be difficult to distinguish between prohibited cartels and legitimate collaboration, PTE shall designate a person who can be contacted in case of doubt. On request, the management is happy provide its employees with assistance in this respect.

Plagiarism

We are committed to implement all necessary and appropriate measures in our scope of responsibility to ensure that neither customer products or their processible components or raw materials nor the corresponding know-how becomes accessible to unauthorized third parties or leave the legitimate supply chain.

Financial responsibility

To maintain the high level of trust from employees, business partners and the public in the long term, PTE's reporting will always be correct and truthful and comply with the applicable laws. The books and records are kept in accordance with legal, regulatory and tax regulations as well as with internationally recognized accounting standards.

Trade Secrets and intellectual property

PTE commits its employees to safeguard trade and company secrets. It is forbidden to divulge confidential information or confidential documents, to third parties without proper authorisation or to provide access to them in any other way, unless proper authorisation has been granted or the information is already in the public domain. The legal stipulations governing data privacy protection concerning the personal data of employees, customers, and investors must be complied with.

Data Protection

Employees must comply with relevant laws and company regulations regarding personal data of employees as well as of external parties. Personal data of natural persons may only be collected, processed, and used in accordance with the legal regulations and operational requirements. Data from employees, customers and investors are treated confidentially. In case of doubt, the responsible data protection officer or a data protection expert should be involved.

Export Controls and Economic Sanctions

PTE complies with all applicable import and export control laws, sanctions and embargoes that place restrictions on the export or re-export of goods, software, services and technology to certain destinations and prohibitions on transactions involving certain countries, regions, organisations, and individuals are subject to restrictions.

Responsible sourcing of raw materials

PTE supports activities which ensure responsible sourcing of raw materials. The procurement and use of raw materials that have been obtained illegally or through ethically reprehensible or unreasonable measures must be avoided.

III. Social Responsibility

Forced Labour

PTE rejects all forms of forced labour. The employment is voluntary, and the employment relationship may be terminated by the employee at any time.

Child Labour

PTE respects the regulations of the United Nations on human rights and children's rights. In particular, PTE commits to comply with the Convention concerning the minimum age for admission to employment (Convention No. 138 of the International Labour Organisation) as well as the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour (Convention No. 182 of the International Labour Organisation). If a national regulation concerning child labour provides for stricter measures, these shall take precedence.

Human Rights

PTE respects and supports compliance with internationally recognised human rights.

Discrimination

PTE commits, within the scope of the applicable laws and statutes, to oppose all forms of discrimination. This applies in particular to unfair treatment based on ethnic or cultural origin, nationality, skin colour, religion or worldview, gender, sexual orientation, political or labour union activity, age, disability, disease or pregnancy.

Health Protection

PTE guarantees protection of workers in the workplace and health protection in the workplace within the scope of national provisions. PTE supports continuous advancement of the process towards improvement of the working environment.

Fair Working Conditions

PTE respects its employees' right of association within the bounds of prevailing laws and statutes. PTE ensures compliance with legal regulations and agreements on working hours, remuneration and regular paid vacation.

Complaint mechanism and protection of whistle-blowers from retaliation

PTE has established a complaints system for employees so that those affected can report negative effects as individuals or as a community. The complaint can be made anonymously. There is no need to fear repression, intimidation, or harassment. All communication will be treated as confidential.

IV. Ecological Responsibility

Environmental Protection

PTE is committed to sustainably upholding the goal of environmental protection for current and future generations. Laws passed for the protection of the environment are to be adhered to. PTE supports environmentally conscious actions by its employees.

Waste management

PTE takes a systematic approach to identifying, handling, reducing and responsibly disposing or recycling solid waste.

Consumption of natural resources

PTE supports the environmentally conscious actions of its employees. Both the generation of waste of any kind as well as water and energy consumption shall be reduced.

Air Quality

PTE strives to minimize emissions of volatile organic chemicals, aerosols, caustics, particulate matter, ozone-depleting chemicals or by-products of combustion.

Responsible Chemical Management

Any chemicals used at PTE that pose a hazard when released into the environment are recorded in the chemicals management system and stored, transported, used, reused, recycled and disposed of safely and in accordance with statutory and occupational health and safety regulations.

V. Suppliers

PTE shall communicate the basic principles of this compliance code to its immediate suppliers, to call for and call for them to comply with it.

VI. Compliance

PTE shall inform its employees of the provisions governed by the Compliance Code and the obligations that result from it.

PTE shall develop and as needed, adapting guidelines and processes so the company complies with the principles of the compliance code.

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Lutherstadt Wittenberg, 05.08.2022



Dr. W. Keil, General Manager



M. Klaue, General Manager

This Code of Conduct is partly adapted from Code of Conduct Compliance-Guidelines of the wdk.

Appendix

UNITED NATIONS GLOBAL COMPACT

The Ten Principles

The principles of the Global Compact are based in a global consensus derived from the following declarations and conventions:

- the Universal Declaration of Human Rights
- the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- the Rio Declaration on Environment and Development, and
- the United Nations Convention against Corruption.

The Global Compact initiative asks companies to recognise, within the sphere of influence, a set of core values in the areas of human rights, labour standards, the environment, and anti-corruption and to comply with this set of core values in practice:

Human Rights

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights and

Principle 2:

make sure that they are not complicit in human rights abuses.

Labour standards

Principle 3:

Businesses should uphold the freedom of associations and the effective recognition of the right to collective bargaining, as well as,

Principle 4:

the elimination of all forms of forced and compulsory labour,

Principle 5:

the effective abolition of child labour, and

Principle 6:

the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7:

Businesses should support a precautionary approach to environmental challenges,

Principle 8:

undertake initiatives to promote greater environmental responsibilities, and

Principle 9:

Encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

Principle 10:

Businesses should work against corruption in all its forms, including extortion and bribery.

Lutherstadt Wittenberg, 05.08.2022



M. Klaue, General Manager



Dr. W. Keil, General Manager