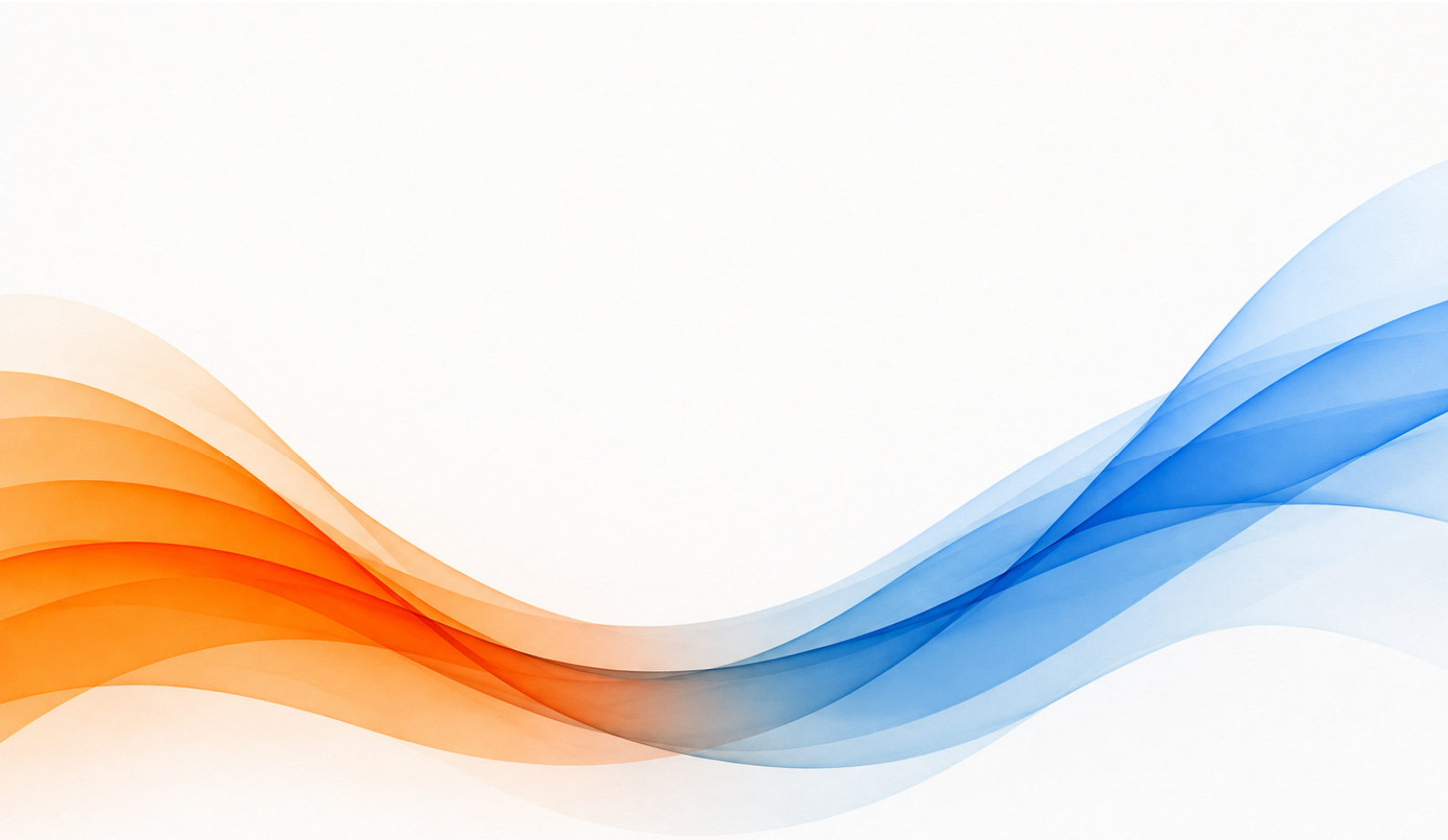




Code of Conduct

**of Polymer-Technik Elbe GmbH and
of SILCOMP Silikoncompounding GmbH**

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1. General Principles, Law and Legislation

Polymer-Technik Elbe GmbH (PTE) and SILCOMP Silikoncompounding GmbH (SILCOMP), hereinafter referred to as “our companies”, are committed to fulfilling their responsibility towards society, the environment and the climate in all business activities. Our companies act fairly towards their business partners and in competition. In addition, our companies protect the health and rights of their employees* in the workplace.

Our companies undertake to comply with the applicable laws and other relevant regulations of the countries in which they operate in all business activities and decisions. At the same time, contractual obligations are fulfilled, taking into account changes in the general framework conditions. Where local laws and regulations impose less stringent requirements, our companies are guided by the principles of this Code of Conduct.

This Code of Conduct is based on the ten principles of the United Nations Global Compact. These call on companies to acknowledge, support and implement a catalogue of core values in the areas of human rights, labour standards, environmental protection and anti-corruption within their sphere of influence.

These principles are based on a global consensus, in particular on:

- the Universal Declaration of Human Rights,
- the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work,
- the Rio Declaration on Environment and Development, and
- the United Nations Convention against Corruption.

2. Principles of Social Responsibility

2.1. Respect for Human Rights

In accordance with Principles 1 and 2 of the United Nations Global Compact, companies should support and respect the protection of internationally proclaimed human rights within their sphere of influence and ensure that they are not complicit in human rights abuses. For this reason, our companies respect and support compliance with internationally recognised human rights. In particular, we protect and guarantee:

- the personal dignity, privacy and personal rights of every individual,
- the right to freedom of opinion and freedom of expression, and
- appropriate treatment of employees, free from physical and psychological hardship, sexual and personal harassment or discrimination.

* For reasons of readability, the term “employees” is used in this document. It always refers equally to all genders.

2.2. Diversity Management

Within the framework of the applicable rights and laws, and in accordance with Principle 6 of the United Nations Global Compact, our companies oppose all forms of discrimination, harassment, bullying, abuse of any kind or other disadvantages that may result in physical or psychological harm. Our companies promote equal opportunities in all areas of the companies. This applies in particular to discrimination against employees on the basis of their descent, ethnic or cultural origin, nationality, skin colour, religion, belief, political or trade union activity, gender, sexual identity and orientation, age, disability, illness, pregnancy or other personal characteristics.

Our companies support gender equality in the workplace. We ensure equal opportunities, equal remuneration and equal working conditions regardless of gender. In addition, our companies take into account and protect special needs related to pregnancy, maternity protection and breastfeeding. We also support our employees in fulfilling family responsibilities, in particular with regard to parental leave and the care of sick children.

In accordance with the Framework Convention for the Protection of National Minorities and the United Nations Declaration on the Rights of Indigenous Peoples, our companies respect and support the rights of minorities and indigenous peoples. In doing so, our companies recognise the right of minorities and indigenous peoples to preserve and develop their institutions, traditions, cultures, identities and self-determination, as well as their right to control the natural resources in their territories and to receive compensation for lands, territories and resources that have been taken, occupied or damaged without their free consent. Our companies prohibit discrimination and marginalisation.

In line with these values, our companies ensure that recruitment processes are fair, transparent and based on equality, and that applicants are assessed free from discrimination and bias.

2.3. Working Conditions

Our companies ensure occupational safety and health protection in the workplace, taking into account international standards and the respective national regulations, and promote the continuous improvement of working conditions. In addition, our companies ensure that all employees receive occupational health and safety instruction relevant to their work.

Remuneration is based on the applicable laws and, where applicable, existing binding collective agreements, and is supplemented by the relevant national minimum wage laws. Furthermore, our companies grant paid recreational leave. Employees are informed clearly, in detail and on a regular basis about the composition of their remuneration.

Our companies ensure compliance with legal regulations and agreements regarding the maximum permissible working hours. This includes planning and ensuring appropriate breaks and rest periods for employees, and ensuring that overtime is performed on a voluntary basis and remunerated appropriately.

In addition, our companies provide appropriate social security for employees so that they are protected against the financial consequences of illness, accidents, old age and unemployment.

2.4. Employment Conditions

Our companies ensure compliance with applicable laws and regulations when employing workers, including appropriate working conditions, working hours and training opportunities.

Our companies observe the United Nations regulations on human and children's rights and follow Principle 5 of the United Nations Global Compact on the abolition of child labour. In particular, our companies comply with the Convention concerning Minimum Age for Admission to Employment (Convention 138 of the International Labour Organization) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Convention 182 of the International Labour Organization). If national regulations on child labour provide for stricter standards, these must be observed as a priority.

In accordance with Principle 4 of the United Nations Global Compact, our companies reject all forms of forced labour, modern slavery or comparable measures involving deprivation of liberty. Work must be performed voluntarily, and the employment relationship must be terminable by employees at any time in compliance with the applicable regulations.

2.5. Freedom of Association and Collective Bargaining

Our companies respect the right of their employees to freedom of association and freedom of assembly, as well as the right to collective bargaining within the framework of the applicable rights and laws. In doing so, our companies follow Principle 3 of the United Nations Global Compact.

This includes, in particular, that our companies do not take any discriminatory or retaliatory measures against employees who exercise their rights in this area and are open to dialogue and cooperation with employee representatives.

2.6. Use of Private or Public Security Forces

When private or public security forces are used to protect the company's operations, it is ensured that affected persons are protected from excessive violence, torture and violations of

freedom of association and the right to organise. Our companies ensure that any security forces deployed respect internationally recognised human rights.

2.7. Land, Forest and Water Rights and Forced Eviction

Our companies comply with all applicable legal requirements relating to land, forest and water rights as well as forced evictions. When acquiring, developing or otherwise using land, forests and waters whose use secures people's livelihoods, our companies do not tolerate unlawful forced evictions or the unlawful deprivation of usage rights.

3. Principles of Ethical Business Conduct

3.1. Integrity in Business Dealings

3.1.1. Fair Competition and Antitrust Law

Our companies are committed to fair competition and comply with the applicable antitrust and competition laws. Any agreements or concerted practices that unlawfully restrict free and open competition are prohibited.

In particular, agreements or other concerted practices with competitors are prohibited if they are intended to, or have the effect of, influencing prices or conditions, allocating sales territories or customers, or otherwise unlawfully restricting competition.

Agreements between suppliers and customers that are aimed at restricting customers in their freedom to independently determine prices or other conditions for resale are also prohibited.

As the distinction between prohibited agreements and permissible forms of cooperation may be difficult in individual cases, employees may contact a designated contact person in case of doubt. Upon request, the management will also provide support.

3.1.2. Anti-corruption, Prevention of Money Laundering and Conflicts of Interest

In accordance with Principle 10 of the United Nations Global Compact, our companies reject all forms of corruption, bribery, extortion and undue influence. Business decisions must be made solely on an objective basis and free from personal interests. Company interests and the private interests of employees must be strictly separated. In particular, the following must be observed:

- Personal benefits, in particular in the form of cash payments, loans, gifts or other benefits with monetary value, must not be offered, promised or granted to public officials in order to obtain unlawful advantages for PTE, SILCOMP, third parties or oneself.

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- Personal benefits must not be offered, promised or granted to employees of other companies if they are intended as consideration for unlawful preferential treatment in business dealings.
- Likewise, employees of our companies must not demand, accept promises of, or accept personal benefits when dealing with business partners if this could unlawfully influence business decisions.
- Gifts, invitations, hospitality or other benefits are only permitted if they remain within the scope of appropriate, customary business hospitality and comply with applicable internal requirements and legal provisions.
- Paid secondary employment is only permitted with the prior express approval of the Human Resources Department.

Our companies may issue supplementary binding rules on the acceptance and granting of gifts, invitations, hospitality and other benefits. These rules may also define permissible exceptions for low-value or symbolic tokens of appreciation.

Conflicts of interest must be disclosed. Anyone who is involved in an actual or potential conflict of interest, or who is unsure whether such a conflict exists, must clarify the matter with the responsible manager, the Human Resources Department or the management.

Furthermore, our companies undertake to comply with all applicable legal provisions for the prevention of money laundering and terrorist financing. It must be ensured that assets obtained unlawfully are neither introduced into the legal economic and financial cycle nor concealed there.

3.1.3. Export Controls and Economic Sanctions

Our companies comply with all applicable import and export control regulations as well as applicable sanctions, embargoes and other foreign trade regulations issued by national and international authorities.

This includes, in particular, restrictions and prohibitions relating to the export, re-export or transfer of goods, software, services and technologies, as well as the prohibition of business dealings with certain countries, regions, organisations or persons.

3.2. Information Policy

3.2.1. Financial Responsibility and Disclosure of Information

In order to maintain the long-term trust of employees, business partners and the public, our companies ensure that their reporting is always accurate, truthful and in accordance with the relevant legal requirements. This includes open and transparent reporting on business activities, finances, corporate governance and sustainability performance.

Books and records are maintained properly and in compliance with the applicable legal, regulatory and tax requirements as well as the applicable accounting standards.

3.2.2. Trade Secrets, Intellectual Property and Plagiarism

Our companies require their employees to protect operational and business secrets. The intellectual property of our companies as well as that of customers, suppliers and competitors must be respected and protected. Confidential information and documents must not be disclosed to third parties or otherwise made accessible without appropriate authorisation, unless the information is publicly available.

Within their respective areas of responsibility, our companies take all necessary and appropriate measures to prevent customer products, editable components, raw materials or the associated know-how from being passed on to third parties without authorisation or from leaving the legitimate supply chain.

Plagiarism, unlawful imitations and the unauthorised use of protected rights are not tolerated.

3.2.3. Whistleblowing and Protection against Retaliation

Our companies have established a grievance system that enables affected persons to report concerns or indications of possible violations of this Code of Conduct, applicable laws or other regulations, either individually or collectively. Reports may also be submitted anonymously, where permitted by law.

Our companies ensure that whistleblowers are not exposed to reprisals, disadvantage, intimidation or harassment and that their identity is treated confidentially.

Every report is reviewed discreetly and carefully in order to initiate appropriate measures and effectively remedy any identified misconduct.

3.2.4. Data Protection and Data Security

Employees must comply with the legal and internal requirements for the protection of personal data. Personal data of employees, business partners, customers and investors may only be

collected, processed, used and retained in accordance with the applicable legal provisions and internal regulations.

Such data must be treated confidentially and protected against unauthorised access, loss or misuse by appropriate technical and organisational measures.

4. Principles of Environmental Responsibility

4.1. Environmental Protection

In accordance with Principles 7, 8 and 9 of the United Nations Global Compact, companies should support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies.

For this reason, our companies pursue the objective of sustainably protecting the environment for present and future generations. National and international laws and agreements enacted to protect the environment must be observed. Our companies strive for the continuous improvement of their environmental and climate protection measures and promote and support environmentally and climate-conscious conduct among their employees.

4.2. Energy and Water Management

Our companies promote the use of renewable energies such as solar energy, wind energy, hydropower or biomass to cover their own energy requirements in order to reduce their carbon footprint and the associated greenhouse gas emissions. At the same time, our companies promote energy-efficient operations through the modernisation of building structures, optimisation of manufacturing processes, the use of energy-efficient technologies and equipment, and the use of low-carbon means of transport.

Furthermore, our companies promote the responsible use of water by giving preference to water-saving technologies and practices in operational processes and by monitoring the wastewater generated. This serves to ensure that pollutants are not released into the environment unnoticed and that the water quality of bodies of water is not adversely affected. In addition, our companies support their employees in using energy and water responsibly in order to reduce everyday consumption.

4.3. Air and Soil Quality, Greenhouse Gas Emissions

Our companies strive to minimise any emissions of volatile organic chemicals, aerosols, corrosive substances, particulates, ozone-depleting chemicals, greenhouse gases or by-

products generated by combustion. Our companies prevent unlawful soil contamination caused by manufactured products, required materials or waste products.

4.4. Noise Emissions

Our companies respond to the specific requirements of our employees as well as local communities and residents by reducing our noise emissions to a minimum through technical and organisational measures. This serves to prevent negative impacts on the environment and human health and is implemented through sound insulation barriers, the use of low-noise machinery and equipment, and the planning of work processes and transport routes.

4.5. Animal Welfare, Biodiversity, Land Use and Deforestation

Our companies strive to protect biodiversity and the natural ecosystems affected by their business activities. For this reason, our companies support animal welfare by ensuring that animals are treated and kept in accordance with ethical and legal standards and that animal products come from responsible or certified sources.

Furthermore, our companies ensure that habitats and thus biodiversity are preserved and that harm to flora and fauna is prevented. This also includes responsible land use, with the aim of avoiding deforestation, land grabbing or measures that destroy habitats wherever possible.

In particular, when procuring raw materials, our companies ensure that these criteria are also observed along the supply chain.

4.6. Responsible and Sustainable Chemicals and Resource Management

Chemicals used in our companies that may pose a risk if released into the environment are recorded as part of chemicals management and are safely stored, transported, used, reused, recycled and disposed of in accordance with legal and occupational safety requirements.

In addition, our companies support activities that ensure responsible and sustainable sourcing of raw materials. The procurement and use of raw materials that have been obtained unlawfully or through ethically unacceptable or unreasonable measures must be avoided. At the same time, ecological and social criteria should be taken into account when procuring raw materials. Furthermore, our companies pursue a systematic approach to identifying, handling, reducing and responsibly disposing of or recycling solid waste, including production and packaging waste. The principle of waste prevention applies, followed by the assessment of possible reuse and recycling before waste is sent for disposal.

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This is to be supported by the application of efficient production methods, the effective use of resources and the consideration of possible waste reduction during the planning and development phases of projects.

Suppliers should actively promote the reuse and recycling of materials and products. They should introduce systems for the collection, separation and further processing of reusable or recyclable materials and provide their employees with training and incentives to participate in recycling programmes. Suppliers should also promote the use of recycled materials in their products and packaging.

5. Requirements for Suppliers

Our companies communicate the principles of this Code of Conduct to their direct suppliers and require and promote compliance with its contents among their suppliers.

Our companies require their suppliers to comply with applicable laws in the country of manufacture, the country of procurement and the country of destination of the deliveries. Suppliers are also encouraged to require their direct suppliers to comply with the contents of this Code of Conduct.

6. Compliance

Our companies will inform their employees about the contents regulated in this Code of Conduct and the obligations arising from them.

Our companies are guided by the principles of this Code of Conduct when designing and adapting policies and processes.

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Tobias Thiele

General Manager

Polymer-Technik Elbe GmbH

SILCOMP Silikoncompounding Elbe GmbH

Matthias Klaue

General Manager

Polymer-Technik Elbe GmbH