

## CODE OF CONDUCT

English Version from: 31.01.2024

We, Felde Fibres, acknowledge the direct and indirect impact of our business operations on society and the environment and we continuously endeavor to strike a balance between economic, social, and ecological interests.

The principles set out in this Code of Conduct are the foundation for our business governing all our internal and external activities and relations.

Hence this code is based on the following principles that define our ethical, ecological and social behaviour:

- We operate in alignment with universally acknowledged values and principles, encompassing integrity and adherence to the law.
- Every operation we undertake is conducted with a profound respect for the environment, which served as the impetus for the inception of our company.
- Individuals or entities engaged in any form of employment, economic, social, or industrial relationship with us are treated equitably and with respect. We establish and sustain business relationships exclusively with reputable partners

### **1. Employment relationships**

We value our employees and denounce any form of unlawful punishment, abuse, harassment, intimidation, or other disrespectful treatment towards our employees. It is imperative that all employees are engaged in a lawful labour relationship and we anticipate similar compliance from our contractual partners.

At the commencement of employment, workers shall receive clear information regarding essential terms and conditions, including their rights and responsibilities, as well as details concerning working hours, compensation, payment procedures, and termination protocols.

We respect and protect employees' right to give notice in compliance with the applicable notice period. When carrying out their duties for Felde Fibres, the employees must act in accordance with the principles of this Code of Conduct, such as legality, loyalty, responsibility, transparency and confidentiality.

### **2. Prohibition of Forced Labour**

Any form of forced labour is prohibited, including any form of servitude, forced, slave, trafficked or involuntary labour.

### **3. Prohibition of Child Labour**

The direct or indirect use of child labour is not permitted and we strictly adhere to the legal minimum age requirements for employment.

We do not employ persons under the age at which compulsory education ends under the law of the place of employment and under the age of 15.

For workers under the age of 18 protection mechanisms must be established which must not be degrading or disrespectful to the worker, in any way.

They may only be hired if it is ensured that the working and employment conditions do not pose a risk to their health, safety or morals, nor are they harmful to their development.

### **4. Remuneration**

The national minimum wage must be guaranteed to all employees. We pay attention to the right of employees to receive fair and sufficient remuneration to provide a decent life for themselves and their families.

We do not permit any deductions from wages that are not authorized by law, including deductions made as a form of disciplinary action.

### **5. Working Hours**

Everyone must comply with the applicable legislation, including overtime, rest breaks and annual leave. We make sure that the regular weekly working time does not exceed 48 hours plus a maximum of 12 hours overtime per week.

Additionally, we respect the right to rest breaks on each working day, ensure that six consecutive working days are followed by a day off, and observe public or religious holidays as well as holiday leave. Overtime is to be compensated or remunerated in compliance with statutory or collectively agreed regulations. It may only be required exceptionally and exclusively based on contractual terms.

### **6. Freedom of association**

We uphold workers' rights to freedom of association, assembly, and collective bargaining, within the bounds of legality in Germany.

### **7. Diversity and Inclusion, Non-Discrimination Policy**

We foster a workplace environment that enables inclusion and where the diversity of our employees is valued. Any form of discrimination or unequal treatment in employment is rejected. This includes discrimination or unequal treatment on the basis of national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief.

We follow the principle of equal pay for workers of all genders for work of equal value.

## **8. Health and safety at work**

We comply with national and international occupational health and safety regulations to establish a secure and healthy working environment for our employees in order to maintain their safety and health as a top priority and to prevent accidents, injuries or work-related illnesses. Regular risk assessment of the workplace and the implementation of appropriate security and precautions is a part of these measurements. We provide regular training sessions in health and safety at work as well as Personal Protective Equipment (PPE) at no charge. Vulnerable groups, such as young employees, new and pregnant mothers and people with disabilities, are under special protection.

## **9. Protection of the environment**

We acknowledge our environmental responsibility as a producing enterprise and pledge to comply with applicable legal and regulatory standards. More than that we will make constant efforts to continuously improve the impact of our business activities on the environment and climate, this includes the following measures:

- Minimize use of natural resources (including energy and water)
- Make efforts to reduce or prevent waste and the minimisation of emissions from operations (e.g. waste water, noise, greenhouse gases)
- Efforts to increase the energy efficiency and the proportion of green or renewable energies in energy consumption at our company locations.
- The professional handling and disposal of hazardous substances and other chemicals as well as waste

## **10. Corruption, trade control, money laundering & fair competition**

Any form of bribery and corruption is forbidden within our enterprise. Our activities align with relevant import and export control regulations, and we strictly adhere to legal mandates aimed at preventing money laundering.

Our employees are not to offer, give or receive any gifts or payments to third parties which could possibly be considered as a form of corruption or bribery. Business partners must not engage in any act of corruption, extortion or embezzlement, nor in any form of bribery.

Furthermore we value free and fair competition and do not tolerate gaining of competitive advantages through unfair business practices.

## **11. Privacy & Data Protection & confidential information**

The privacy rights of our employees, business partners and customers are respected and protected. We comply with the applicable data protection and security requirements and regulations when handling personal information. Personal data entrusted to us will be strictly used for the purposes for which it was collected and will not be communicated to third parties, except when there is a need for such transmission in the performance of a contractual relationship or in fulfilment of legal obligations.

Intellectual property of our business partners, customers and third parties is respected and handled with precaution to protect intellectual property rights when transferring expertise and technologies.

## **12. Compliance with applicable laws**

Compliance with applicable legislation is guaranteed in all matters that were not mentioned in the preceding points.

## **13. Implementation of the Code**

We consistently strive to adhere to the principles outlined in the Code of Conduct through appropriate and reasonable efforts.

We take any violation of the Code of Conduct seriously. In the case of serious violations we retain the right to implement appropriate contractual measures, up to and including termination of the business relationship. Any violations will be dealt with by suitable preventive or remedial actions.

Furthermore we pledge to:

- Communicate the contents of the Code of Conduct to our employees and business partners and will train on relevant topics as required.
- Control the supply chain. As such, we ensure the identification and validation of our contractual partners through suitable methods before engaging in a supply relationship, such as self-disclosure, contractual commitment, or comparable means.
- Long-term business relationships based on partnership are valued and nurtured. It is our goal that every party in the supply chain profits from our mutual business activities under constant consideration of the principles of this Code.