

**interzero**<sup>®</sup>  
zero waste solutions

# Our Code of Conduct



# Table of Contents

<b>1</b>	<b>Our principles and social responsibility</b>	page 5
<b>2</b>	<b>Our conduct within the company</b>	page 7
<b>3</b>	<b>Our conduct when doing business</b>	page 9
<b>4</b>	<b>Our confidentiality and communication</b>	page 11
<b>5</b>	<b>Internal reporting body and contacts</b>	page 13
<b>6</b>	<b>Decision-making guidance at a glance</b>	page 13

## Dear **Colleagues,**

As one of Europe's leading circular economy service providers, Interzero is actively and successfully shaping the circular economy of the future. Our vision is a world without waste. With our "zero waste solutions", we help create sustainable value and protect the climate and resources. The credibility, proper conduct and commitment of our employees is crucial for gaining the confidence of our customers, partners and the general public. Each and every individual has a part to play in shaping Interzero's reputation.

Our corporate values provide a basis for how we want to work together now and in the future. Our Code of Conduct also serves as a set of binding guidelines for our conduct in the workplace. It is designed to help us constantly review our own behaviour, act responsibly in every situation, and meet increasingly complex legal requirements.

The Code of Conduct not only covers the ethical, moral and legal obligations of all of Interzero's employees and managers. It is also a general commitment to the outside world that we will be responsible and environmentally aware not only in all of our dealings with business partners and the public but at the same time also for proper conduct towards each another within the company.

We share a collective responsibility for the reputation of our company. We therefore ask you to join us in adhering to the Code of Conduct and relying on it as a means for creating a positive work environment. By doing this, you contribute to the long-term success of our company.

Thank you for your support!

The Interzero management team

Sebastiaan Krol, Jan Kroker, Markus Müller-Drexel and Felix Held

### **Our Code of Conduct as part of our compliance management system**

The personal integrity and sound judgement of our employees are vital for the successful delivery of our international services. This is why it is so important for all employees to know the rules that our company has set itself and to be aware of the impact of any action or decision they may take.

This Code of Conduct is the central guideline for employees on how to conduct themselves when working for our group of companies. The requirements for legally acceptable conduct stated in this Code are binding for all employees and management staff, and are intended to

provide guidance on whether or not an action or decision is acceptable. Our corporate values – respect, dialogue and responsibility – and our rules of conduct form part of this Code of Conduct, which covers ethical, moral and legal obligations. As a result, it provides **reliable guidance** for our conduct in the workplace. The Code of Conduct is supplemented by more detailed guidelines and policies on individual topics.

We have established a compliance management system to help us meet our corporate and legal requirements and ensure the sustainable success of our company.



# Our principles and social responsibility

As a leading provider of circular economy services, Interzero is committed to sustainability. Environmental, economic and social responsibility are part of our corporate DNA. Being committed to sustainable economics, safeguarding social and ecological standards and acting in the interests of society as a whole are crucial to our self-image and credibility. Our principles and standards on these issues are therefore quite clear.

## Human rights and child labour

We respect and promote internationally recognised human rights. We will not tolerate any behaviour that undermines these rights. We also reject forced labour of any kind. We will not accept the illegal employment of children and young people in our company.

## Equal opportunities and non-discrimination

To enable our employees to fully tap into their potential, we create the best possible working environment that is free of discrimination. We invest in training and developing our employees and are committed to diversity and fair opportunities. We actively encourage equal opportunity and avoid any form of discrimination when hiring or promoting employees or when providing training and professional development. We treat all employees equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity or orientation, disability or religion.

## Compliance with the law

We expect all employees to comply with relevant laws and regulations. All the managers in our company are required to familiarise themselves with the fundamental legal principles so that they can act as role models for our employees and advise them on how to remain in compliance with the law.

## Compliance with social standards

Interzero takes responsibility for the people who work in and for the company. We work with our managers to ensure that all employees are treated with dignity and respect. All employees should be able to work in an environment that is free from physical, sexual, psychological and verbal abuse. Regardless of the position of those involved, we will investigate any violations of this principle while at the same time respecting the interests of victims and possible witnesses.

We expect our employees to uphold democratic principles.

We comply with the legal regulations governing fair working conditions, remuneration, working hours and the protection of privacy.

Interzero can only achieve its mission goal of “zero waste solutions” with the help of motivated and productive employees. That is why we offer our employees opportunities for personal and professional development. As part of our professional development programme, we encourage our employees to improve their professional skills by attending appropriate training and professional development courses. We also take the physical and mental health of our employees seriously and support them by offering a range of tailored health promotion measures and a harmonious work-life balance.

We also expect our business partners and suppliers to observe comparable social standards in connection with human rights, compliance with the law, the protection of minors, dealing with employees, equal opportunity, health and safety in the workplace, wages and social benefits.

To this end, Interzero has developed a Supplier Code of Conduct that also forms part of contract negotiations and regular audits at Interzero. In the Code, the signatory suppliers commit themselves to complying with minimum environmental and social standards – including the prohibition of child and forced labour, a ban on discrimination, the payment of living wages, and the guarantee of occupational safety.





Further details can also be found in the company's mission statement on its human rights and environmental strategy.

#### Health and safety

Occupational health and safety are vital parts of all of our company's operating processes.

We take the necessary steps to avoid accidents and health risks in the workplace and to ensure compliance with occupational health and safety regulations. All managers are required to support their employees in this regard.

We expect all subcontractors and companies who work with Interzero to adhere to comparable standards.

#### Environmental protection and sustainability

Our vision is a world without waste – a world worth living in today and for the generations of tomorrow. As a partner for innovative circular solutions and effective plastics recycling, we actively help our customers to prevent waste, safeguard raw materials and significantly improve their sustainability performance. Sustainability is fundamental to our corporate strategy.

Protecting the environment, climate and resources is critically important to us. We also attach great importance to avoiding or minimising environmental pollution by consistently reducing our use of energy and water as well as our emissions and waste. Our "zero waste solutions"

and materials recycling make a measurable contribution to resource and greenhouse gas savings – and thus help to preserve the basis of life on our planet.

We are actively shaping the circular economy of the future by helping to close material loops, making use of eco-efficient technologies and environmentally-friendly materials, and promoting conservation and reusability.

We support sustainable business and encourage our managers and employees to be environmentally aware. All employees are responsible for making careful use of natural resources and doing their best to protect the environment and the climate.

Our sustainability reporting provides transparent and full details of our performance in terms of social and ecological aspects. This gives customers, employees, suppliers and other interested parties an insight into how our company's business activities affect society and the environment.

#### Quality management

Our quality management system ensures that the products and services we develop and sell fully comply with the requirements of our customers. All employees are responsible for making sure that their external and internal customers are satisfied. Quality management, together with our environmental management and health and safety, forms part of our integrated management system. This is regularly certified to the European ISO standard by external auditors.

# Our conduct within the company

#### Conduct towards other employees

It is very important to us that all employees treat each other with trust, openness and respect. We actively oppose discrimination, harassment and other disparaging behaviour towards our employees.

#### Our corporate values

With the active participation of the workforce, Interzero has developed a set of shared values, which it has communicated throughout the company. These put respect, dialogue and responsibility at the heart of the corporate culture of all Interzero companies. We act in accordance with these values.

#### Treating each other with respect

We are curious about and interested in each other and respect our differences. When we interact, we respect the norms of good behaviour in our tone and our actions, and we assume the best in others. We recognise and value the results of the work and efforts of others.

#### Maintaining an open exchange with each other

We actively network and take the time to develop personal relationships. When interacting with others, we believe it is important to listen and ask questions. We make sure that knowledge and information are communicated and received purposefully, promptly and in a way that the recipient understands. We are open to change and like to generate and develop ideas.

#### A shared approach to responsibility

We honour agreements and commitments and carry out our specific role. We share a common goal and participate creatively and enthusiastically, employing a solution-based approach to problem-solving. In our proactive support and welfare activities, we make careful use of our own and other people's resources.

The values of respect, dialogue and responsibility are both the framework and the platform for working together. This makes it easier to anticipate and appreciate the behaviour of our colleagues and managers. Everyone can and should play their part in helping us to coexist positively.

#### We embrace change

By actively networking and being responsible in our dealing with each other and the company's resources, we can approach our day-to-day business, projects and conflicts more effectively and make good decisions.

Our performance is improved by our sense of responsibility for the business as a whole, more direct communication and the diverse and talented people who have the courage and strength to develop and try out new ideas.

#### Avoiding conflicts of interest

In our company, business decisions are made in the interests of the company.

We therefore avoid situations in which our personal or financial interests conflict with those of the company.

If a conflict of interest should occur, however, it must be resolved in accordance with the law and the relevant corporate guidelines.

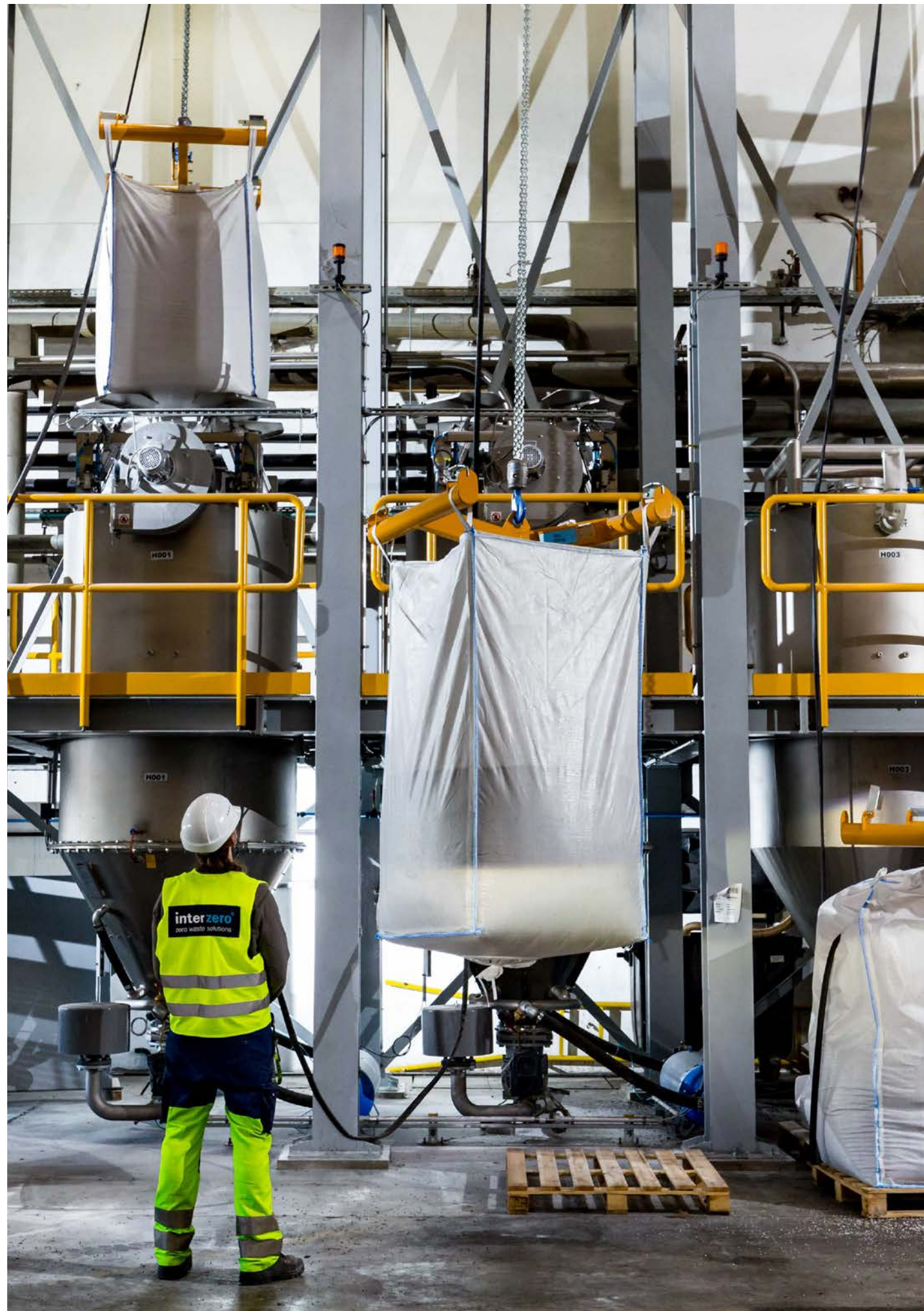
#### Care of company property

We treat and use the company's property with care and respect and protect it from loss, theft and misuse. We use the company's physical and non-physical assets solely for business purposes and not for personal benefit unless this is expressly permitted.

Our employees and their managers are responsible for ensuring that the type and duration of business trips are commensurate with their purpose. When planning a business trip, we always consider the cost and time aspects and comply with the company's rules for business travel.







# Our conduct when doing business

## Prevention of corruption

Our company stands for technical expertise, innovative products, customer focus and a highly motivated, responsible workforce. These are the factors upon which our strong reputation and our continued success in a competitive business sector are based.

Corruption threatens this success and will not be tolerated. We will not pay bribes or make use of any other dishonest attempts to influence business decisions in order to win business. We will decline a potential business opportunity rather than break the law.

All company employees are required to actively participate in the successful prevention of corruption within their sphere of influence.

## Presents, invitations and other gifts

The giving and receiving of gifts or hospitality (presents, invitations and other such benefits) that could be linked to a business decision is prohibited.

Gifts or benefits that could in any way be viewed as improperly influencing a business decision must be avoided.

To ensure maximum compliance in this area, our company has issued an "Anti-corruption Policy" which regulates, among other things, the giving and receiving of business gifts and hospitality such as business entertainment, events and so on. We expect both our employees and our business partners to adhere to the requirements contained in this policy.

## Donations and sponsoring

Because we see ourselves as an active member of society, we are committed to an active programme of social engagement. We make donations and other forms of social investment without expecting anything in return.

We do not donate to political parties or to foundations and institutions with political associations.

We will only consider sponsorship after examining its legal implications and on the basis of an appropriate outcome and return. Sponsorship arrangements must also comply with the company's internal policies.

## Dealing with government departments, agencies and public bodies

We are honest, transparent and law-abiding in all of our dealings with government departments.

If we receive an inquiry from a government department or body that we do not consider to be routine, we always inform the manager responsible and, if necessary, our legal department to enable them to respond accordingly.

## Fair competition and antitrust law

We are committed to the principle of fair competition and comply with the relevant statutory regulations.

Antitrust violations represent a threat to our success and are not tolerated.

Our managers and employees comply with antitrust regulations without exception. In particular, they will not enter into an agreement with competitors, suppliers or other companies that could unlawfully affect competition.

In case of doubt, our legal department must be involved in any decisions.



**Prevention of money laundering**

We comply with our legal obligations to prevent money laundering and do not participate in money laundering activities.

All employees are required to refer for investigation by our legal department any unusual or suspicious financial transactions, including cash transactions that may involve money laundering.

**Protection of intellectual property**

We comply with all legislation and company regulations on the protection of intellectual property. Intellectual property is protected by law (e.g. copyright, trademark or patent law) or as a trade secret.

The legal position often depends on the circumstances of any individual case. If there is any doubt, we ask our legal department for its opinion.

**Financial integrity**

Our company's business transactions and records must be accurate and legislation-compliant. We record and document all transactions, assets and liabilities in accordance with statutory requirements.

Documents relevant for financial accounting must not contain any entries that are known to be false or misleading. Any form of balance sheet manipulation is prohibited.



# Our confidentiality and communication

**Confidentiality**

We protect and maintain the confidentiality of our company's business secrets.

These business secrets include all documents that are not suitable or intended for external publication, such as contracts, draft contracts, planning data, financial data, personnel information, intellectual property and any other commercial (confidential) information.

Confidential information is made available internally only to employees who require it for business purposes.

Special protection mechanisms must be used for confidential information in digital format.

When sending emails, we make sure that confidential documents and attachments are sent only to those authorised to see them.

We do not reveal confidential or sensitive company information on social networks.

The disclosure of confidential information to third parties is permitted only when it is in the interests of the company and the disclosure does not violate legal or contractual regulations. Before revealing confidential information to a third party, we always ascertain whether there is a need for a confidentiality agreement. In cases of doubt, the legal department should be consulted.

**Communication with the public**

We respect the right to freedom of expression and the protection of personal rights and privacy.

All employees should be aware that they will be seen by others as part and representatives of our company. How they behave in their private life may therefore reflect upon the company. All employees are therefore asked to protect the reputation of the company and to ensure that their conduct in public does not bring the company into disrepute. This also applies to communication via social media channels in particular.

**Statements in marketing, advertising and reporting**

We always supply truthful information about our services in our marketing and advertising. False statements and misleading information can have a negative impact on both our customers and our reputation. We attach importance to open and truthful reporting and communication of the company's business activities to investors, employees, customers, business partners, the public and government institutions.

**Data privacy**

We take the greatest possible care when collecting, storing, processing and transmitting the personal data (such as name, address, telephone number, date of birth, etc.) of employees, customers and other third parties, and comply with all relevant laws and regulations. In case of doubt, we seek the advice of the company's data protection officer.

**Transparency of information**

We take steps to ensure that information is exchanged quickly and efficiently within the company. Information supplied to other authorised parties must be accurate and complete. Knowledge required to carry out an activity will not be unfairly withheld, falsified or communicated selectively. The legal position often depends on the circumstances of any individual case. If there is any doubt, we ask our legal department for its opinion.



# Internal reporting body and contacts

We actively support communication of the rules upon which this Code of Conduct is based. We encourage our employees to address issues and problems openly. Employees who raise concerns about business matters in good faith will not be disadvantaged.

Our managers have an obligation to act as role models and should be the first point to contact if there is a need to clarify the regulations. Part of their work as managers is to prevent unacceptable behaviour and to take appropriate action to prevent violations of the rules within their departments.

An external lawyer and ombudsman is available to employees and business partners to answer questions about this Code of Conduct and to provide advice about violations of laws and policies.

Our legally qualified ombudsman serves as the company's internal reporting body in accordance with the German Whistleblower Protection Act (HinSchG). The ombudsman also acts as a complaints body in accordance with the German Supply Chain Due Diligence Act (LkSG).

The lawyer and ombudsman will treat all information confidentially.

The contact details are:

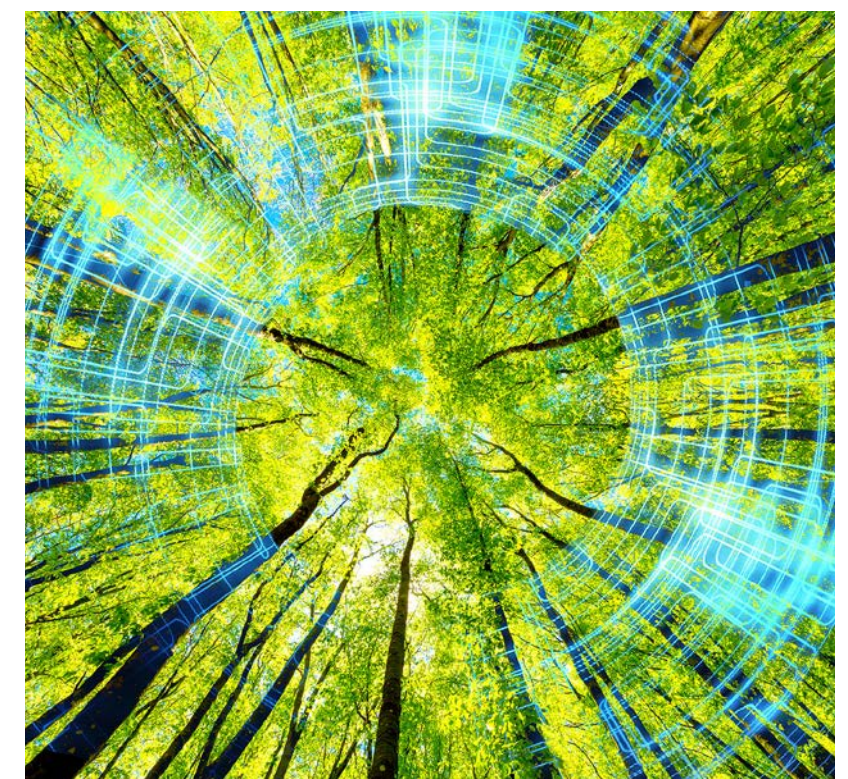
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# Decision-making guidance at a glance

If you are unsure whether a decision complies with the company's rules, it may help if you ask yourself the following questions:

- Is my decision legal and in keeping with the company's rules?
- Can I make a decision that is in the best interests of the company and free from any potential competing interests I may have?
- Can I reconcile the decision with my own conscience?
- Can I share the decision with the outside world without any problem?
- Would the decision stand up to scrutiny by third parties?
- Will my decision maintain the good reputation of the company?

If you can answer all of these questions with "yes", your decision is acceptable. Should you have any doubts, however, please discuss them with the contact persons previously mentioned.





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