

# Code of Conduct

Our Code of Conduct is a set of **binding guidelines** that provide reliable guidance for our conduct in the workplace. It combines our **existing corporate values** and **rules of conduct**, and explains the ethical, moral and legal standards required of every employee and every manager.

## Foreword

Our corporate values determine how we want to work together now and in the future. Each one of us is responsible for deciding whether our conduct is acceptable or not. As the laws governing employee conduct become more complex and more far-reaching, it is often difficult to know exactly how we should behave in many situations.

Our Code of Conduct is a set of binding guidelines that provide reliable guidance for our conduct in the workplace. It combines our existing corporate values and rules of conduct, and explains the ethical, moral and legal standards required of every employee and every manager. The Code of Conduct 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 also in our dealings with each another within the company.

We share a collective responsibility for the reputation of our company. The misconduct of a single individual can cause enormous damage to everyone. 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 all contribute to the long-term success of our company. Thank you for your support.

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## 1. The Code of Conduct as part of our compliance management

The personal integrity and sound judgement of our employees are vital for the successful delivery of our 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 therefore provides valuable guidance for employees on how to conduct themselves when working for our company. The requirements for legally acceptable conduct stated in this Code are binding on all employees and are intended to provide guidance on whether or not an action or decision is acceptable. Our corporate values also form part of the Code of Conduct.

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 continued success of our company.

## 2. Principles and social responsibility

We believe that social responsibility and credibility means being committed to sustainable economics, safeguarding social and ecological standards and acting in the interests of society as a whole. Our principles and standards on these issues are therefore quite clear.

### 2.1 Human rights and child labour

We respect and promote internationally recognised human rights. We will not tolerate any behaviour that undermines these rights.

We will not accept the illegal employment of children and young people in our company.

### 2.2 Equal opportunities and non-discrimination

We actively encourage equal opportunity and avoid any form of discrimination in the hiring or promotion of employees or in the provision of 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.

### 2.3 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.

## 2.4 Compliance with social standards

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.

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 expect our business partners to observe comparable social standards in the areas of human rights, compliance with the law, protection of children and young people, treatment of employees, equal opportunities, health and safety in the workplace, wages and social benefits.

## 2.5 Health and safety

Health and safety is a vital part 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 subcontractors and all companies who work with us to adhere to comparable standards.

## 2.6 Environmental protection / sustainability

As a company in the waste management and recycling industry, protecting the environment and the climate and making efficient use of resources are of great importance to us.

We also attach great importance to avoiding or minimising environmental pollution by reducing our use of energy and water as well as our emissions and waste.

We therefore make use of eco-efficient technologies and materials which are environmentally friendly, economical and reusable. We support sustainable business and encourage our managers and employees to be environmentally aware.

Every employee is responsible for making careful use of natural resources and doing their best to protect the environment and the climate.

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

## 2.7 Quality management

Our quality management system ensures that the products and services we develop and sell fully comply with the requirements of our customers. Every employee is responsible for making sure that their external and internal customers are satisfied.

Quality management, together with 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.

## 3. Conduct within the company

### 3.1 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.

### 3.2 Corporate values

We operate according to our values of respect, open dialogue and responsibility ("we are one").

#### **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 our cooperation. This makes it easier to anticipate and appreciate the behaviour of our colleagues and managers. Everyone can and should contribute towards our coexistence.

### 3.3 We embrace CHANGE

Thanks to the combination of improved internal networking, respectful and responsible interpersonal behaviour and the resources of the company and of ourselves as people, we are better able to handle day-to-day business, projects and conflicts, and make 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.

### 3.4 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.

### 3.5 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.

## 4. Ethical behaviour in the workplace

### 4.1 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 these success factors 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.

### 4.2 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 guideline" 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 policies contained in this guideline.

### 4.3 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 or 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.

### 4.4 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.

## 4.5 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 company's managers and employees 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.

### 4.6 Prevention of money laundering

We comply with our legal obligations to prevent money laundering and do not participate in money laundering activities. Every employee is required to refer for investigation by our legal department any unusual or suspicious financial transactions, including cash transactions that may involve money laundering.

### 4.7 Protection of intellectual property

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

We respect intellectual property rights. However, 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.

### 4.8 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.

## 5. Confidentiality and communication

### 5.1 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.

### 5.2 Communication with the public

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

Every employee should be aware that they will be seen by others as part 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.

### 5.3 Statements in marketing and advertising / 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.

## 5.4 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.

## 5.5 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.

## 6. Implementation and contact persons

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 of 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 regulations. The lawyer and ombudsman will treat all information confidentially. The contact details are:

**Compliance Officer Services Legal**  
**Stephan Rheinwald, solicitor**

Telemannstrasse 22  
53173 Bonn  
Tel. +49 228 35036291  
s.rheinwald@cos-legal.eu

## 7. Guidance on decision-making

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 probably fine. Should you have any doubts, however, please discuss them with the contact persons previously mentioned.