

CODE OF CONDUCT

CODE OF CONDUCT FOR CORPORATE SOCIAL RESPONSIBILITY

PRELIMINARY REMARKS

GUMMIVOGT GmbH & Co. KG commits through this Code of Conduct (CoC) to its corporate social responsibility in relation to all its company activities. The CoC also expressly applies to the requirements that the company GUMMIVOGT imposes on its suppliers. The CoC therefore also applies to all corporate activities outside of Germany and corresponds broadly with the internationally used term of Corporate Social Responsibility (CSR).

This CoC specifies what the commitment to corporate social responsibility actually means in practice in relation to working conditions, collaboration, transparency and exchange as well as environmental and social sustainability for the company GUMMIVOGT. It therefore summarises all the value and activity guidelines of the company. The company GUMMIVOGT has undertaken this voluntary commitment to apply this CoC due to its ever more complex and global activities. The CoC must be understood as an active contribution to meeting the social challenges of global and local operations and activities and to shape these constructively.

1. GENERAL UNDERSTANDING OF RESPONSIBLE CORPORATE MANAGEMENT AND SCOPE OF THIS CODE OF CONDUCT

This CoC is based on a sophisticated understanding of responsible corporate management. For the company GUMMIVOGT this specifically means assuming the most comprehensive responsibility possible for the consequences of its corporate activities and decisions. As the impacts of corporate activity are wide-ranging and affect different areas such as ecology, technology, economy and society, a sophisticated and forward-oriented approach is necessary. Therefore, to the extent it is possible, the company GUMMIVOGT acts to support all areas of work and life affected by its activities throughout their development. The basis for this are the general values and general principles of ethical conduct such as integrity, honesty and the preservation of human dignity.

This CoC applies to the company GUMMIVOGT GmbH & Co. KG with its head office in Arnsberg, North-Rhine Westphalia, Germany. The company further commits, to the extent this is possible, to promote and demand compliance from its suppliers with the principles of this CoC. In principle efforts are made to balance interests. Infringements of this CoC may be grounds for the company GUMMIVOGT to terminate the business relationships and contractual links.

2. SPECIFIC PRINCIPLES OF SOCIALLY RESPONSIBLE CORPORATE MANAGEMENT

The company GUMMIVOGT works proactively to ensure that the following principles of socially responsible corporate management are observed and implemented.

Legal conformity

The company GUMMIVOGT observes the applicable laws and provisions of the countries in which it operates and proactively orients its activities accordingly. Added to this – in countries with a weaker institutional or legal constitution – is the verification whether elements of the company's own management should be introduced or enlisted for support.

Integrity and organisational governance

- GUMMIVOGT orients its actions to ethical principles and values. First and foremost these include integrity – therefore the compliance of one's own actions with the self-imposed provisions and guidelines. Key aspects are also religious and ideological tolerance, respect for human dignity, honesty and respect and openness to ethnicity, gender, sexual orientation, disability, etc.
- Corruption, bribery and other forms of unlawful undue advantage are expressly rejected in accordance with the UN Resolution on the Universal Declaration of Human Rights. Instead of this, GUMMIVOGT promotes all measures and endeavours to encourage transparency and legally-compliant corporate management.
- The company GUMMIVOGT represents the serious and recognised business practices of fair competition. Legally-compliant conduct in relation to partners and other market stakeholders and the professional interaction with each other are guidelines of this activity. The same applies to interactions with authorities, organisations and testing facilities.

Preservation of consumer interests

The preservation of consumer interests is a key concern. Consumer protection provisions are complied with consistently by GUMMIVOGT and all sales, marketing and information policies are oriented to these accordingly. In particular these include consideration for specifically vulnerable groups.

Principles of communication

GUMMIVOGT places great emphasis on openly communicating the principles and requirements formulated in this CoC. This applies without exception to all persons, groups and organisations involved in company affairs. Customers, employees, suppliers and other parties are considered equally in this regard.

Documentation and paperwork are compiled, filled out, transmitted and archived appropriately and in full. Inadmissible changes or the destruction of important documents are forbidden. As regards confidentiality and the preservation of company secrets all employees are requested to exercise the utmost care and caution.

Observance of human rights

GUMMIVOGT is expressly committed to the observance of human rights in accordance with the UN Resolution on the Universal Declaration of Human Rights. These include in particular:

- Privacy protection: The protection of the privacy of employees and all persons involved in company affairs.
- The promotion of health and safety: The health and safety of all employees is of central importance. The company GUMMIVOGT therefore undertakes all the requisite and conceivable measures to make the entire working environment safe and to avoid accidents, injuries and other impairments associated with working processes.
- Avoidance of all types of harassment: All employees must be protected from harassment, coercion, physical punishment and from mental, psychological, sexual and verbal violence.
- Unequivocal preservation of the freedom of speech: The company GUMMIVOGT expressly commits to the right to freedom of expression and freedom of speech.

Formulation of working conditions

GUMMIVOGT adheres to the following working standards of the International Labour Organisation (ILO):

- Prohibition of child labour: It is forbidden by law to employ people younger than 15 years of age in Germany. If higher age limits apply in another country, these must be adhered to. Any exceptions from these rules must comply expressly with any respective statutory regulations.
- Prohibition of forced labour: Any form of forced labour is forbidden.
- Remuneration: Statutory provisions and minimum thresholds for the payment of employees are to be adhered to consistently.
- Workers' rights: GUMMIVOGT respects and protects the right of employees to the freedom of association and organisation in accordance with the respective national laws. This also applies to the right to collective bargaining.
- Prohibition of discrimination: All employees, customers and business partners associated with the company enjoy protection from all types of discrimination.
- Working time regulations: GUMMIVOGT respects the statutory regulations relating to working hours.

Environmental protection and ecological responsibility

GUMMIVOGT meets statutory provisions and environmental regulations in its plants. All employees strive to act environmentally and to handle resources responsibly. These include in particular:

- Proper treatment of industrial waste water:
Waste water from plant operational processes, production processes and sanitary facilities is to be typified, checked and treated if required before discharge or disposal. Furthermore, measures are encouraged which help reduce waste water.
- Reduction of emissions: All emissions from plant operational processes are to be typified, routinely monitored, checked and treated if required before release. Suppliers of GUMMIVOGT must also monitor their waste gas purification systems and are urged to find solutions to reduce emissions.
- Appropriate handling of waste and hazardous substances: GUMMIVOGT follows a systematic approach to determine, handle and reduce solid waste and to dispose of it responsibly or to recycle it. Chemicals or other materials which represent a risk to

the environment on their release are to be determined and handled in such a way that when handling these substances the safe transportation, storage, usage, recycling or reuse and disposal is guaranteed.

- Reduction of consumption of raw materials and natural resources: GUMMIVOGT strives to keep the use and consumption of resources as low as possible during production. The generation of all types of waste and the consumption of water and energy is to be reduced and/or avoided.
- Reduction of energy consumption: Energy consumption is to be monitored and documented. GUMMIVOGT strives to find economical solutions to improve energy efficiency and to keep energy consumption as low as possible.

Civic engagement

GUMMIVOGT expressly promotes the development of its environment from a social and economic perspective. Activities of its employees which contribute to promoting the country and the region are supported provided they do not infringe applicable law.

3. IMPLEMENTATION AND ENFORCEMENT OF THE PROVISIONS

The company GUMMIVOGT undertakes all possible and suitable measures to implement and apply the principles and values formulated in this CoC. When interacting with contractual partners the provisions are communicated where required and aligned with the corresponding provisions of the contractual partner so that subsequent compliance can be guaranteed. Company or business secrets or other information subject to data protection are excepted from this exchange process.