



# Code of Conduct

For fair cooperation in the MAPAL Group





**Dear Colleagues,**

Our customers and their needs are at the centre of everything we do. After all, it is our customers who safeguard our jobs now and in the future. It is therefore our ongoing job to design our processes in such a way that we can achieve the best possible quality as quickly and economically as possible for our customers and for ourselves. However, having the right processes and structures alone is not sufficient for keeping our customers satisfied and loyal to us over the long term. We also need good communication between us and our customers, and also within the MAPAL Group, as well as acting in line with rules and regulations in pursuit of our goals.

The company management therefore has high expectations for itself and for each individual employee. These are part of our corporate culture and form the basis for the trust that our customers, business partners and the public have in us.

The Code of Conduct does not aim to reflect all legal regulations that apply to our business activity, but explicitly mentions the areas that are important for the lasting success of the MAPAL Group or for which an infringement could result in serious financial disadvantages or harm to reputation. The Code of Conduct should help you to recognise legal risks and to prevent violations of the law.

Accordingly, all employees are expected to comply with the rules and regulations even in cases not explicitly referred to in this Code of Conduct. This Code of Conduct applies to all sites within the MAPAL Group.

**Dr. Jochen Kress**





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# 1 Fair treatment of our employees and a ban on discrimination

Nobody must be disadvantaged, favoured or harassed as a result of their ethnic origin, skin colour, nationality, gender, religion or beliefs, disability, age, sexual orientation or other characteristics protected by law.

Fair treatment also includes fair working conditions. This includes free choice of employment, i.e. a ban on mandatory or slave work and human trafficking, the ban on child labour, compliance with legal or contractually prescribed or agreed working hours and remuneration, freedom of association and the right to humane treatment in the workplace.



## 2 Fair competition and prevention of corruption

The MAPAL Group is fully committed to the principles of free enterprise and fair competition. We pursue our corporate goals exclusively in line with the merit principle and in compliance with the applicable competition rules. We expect the same from our competitors and business partners.

Corruption is a global problem that results in immense economic losses. It jeopardises fair competition because the best provider rarely gets a chance.

Corruption is forbidden. Demanding, accepting, offering or granting personal benefits in exchange for prioritisation in the initiation, award or processing of a contract constitutes corruption. Those who grant or promise benefits are just as liable to criminal prosecution as those who demand or accept them.



### 3 Conflicts of interest

There is a potential conflict of interest when the private interests of one of our employees conflict or may conflict with the interests of the MAPAL Group. Such conflicts of interests may arise from secondary employment in particular. If an employee places their personal interests over those of the company, this can harm the company.

To avoid conflicts of interest, HR must be informed and permission must be obtained before undertaking additional (professional) activities, mandates or similar activities.

MAPAL welcomes its employees' socio-political and social engagement. Involvement in associations, parties or other societal, political or social institutions based on democratic principles, either as elected officials or honorary positions, must however be compatible with the fulfilment of employment duties.

Undisclosed conflicts of interest and unapproved secondary employment may result in harm to the company and lead to disciplinary action for the employee in question.



## 4 Data privacy

The MAPAL Group takes data protection seriously when handling its customers', employees' and business partners' personal data. The data protection officer supports the divisions of the company with this.

Personal data is only collected, stored or shared if this is necessary to perform tasks and is legally permitted, or the data subject has granted their consent.

Documents containing personal data are disposed of securely, i.e. in line with legal regulations.



## 5 Occupational health and safety

To avoid putting people's health at risk, occupational safety regulation must be observed. Occupational safety is not a side issue – it is an essential duty of every employee. Managers have an important responsibility to serve as a role model here.

The requirements conveyed through regular safety instructions on the topics of occupational health and safety, fire protection, environmental protection and energy saving.

Every manager is responsible for protecting their employees and must instruct, train and supervise them in line with legal regulations.



## 6 Environmental protection and efficient energy use

**In the MAPAL Group, we have the following commitments to environmental protection and efficient energy use:**

- A considerate approach to the environment and the considered and sparing use of all resources including energy, organised recycling and disposal govern our actions. This prevents or minimises pollution for humans, the environment and nature and continuously improves energy performance.
- We consider the requirements of keeping the environment unspoilt in the development and design, the manufacturing process, when packaging and shipping our products as well as when improving processes and introducing new facilities and products.
- Maximum efficiency when handling resources, while ensuring sustained economic efficiency, is our principle.



## 7 Handling company property

Every employee is obliged to handle company facilities, especially machines and tools but also information and communication systems, carefully and for the intended purpose. The workplace and all facilities that are for use by the company or its workforce must always be kept in good working order. Any damage must be reported to the management.

Company property must not be used for private purposes or removed from the company's premises without the explicit permission of the responsible authority within the company.



## 8 Protection of company assets

Our product developments and expertise are of particular importance for our company's long-term success. Our intellectual property therefore must be protected against disclosure to third parties, imitation and against unauthorised access by third parties. Intellectual property includes, for example, inventions and product prototypes, but also business secrets such as details about customers, suppliers and software.

Every employee is obliged to use all data and information of which they become aware through work in the permitted context only, and when sharing said data outside of the company to check that the recipient is authorised to receive said data and information. Depending on the importance of the information, additional security measures such as secrecy obligations may have to be agreed.



## 9 Export and customs regulations

The MAPAL Group is aware of its social responsibility with regard to tax and customs obligations.

All imports and exports are declared properly to customs, and MAPAL does not tolerate any form of smuggling. As an international company, MAPAL undertakes to comply with international and national laws and embargos.

We keep ourselves informed of current regulations governing foreign trade, follow any amendments to them and implement them in our daily work.

The enforceability of a legal transaction in line with the current legal situation must be assessed in advance with the responsible export and customs experts as well as the relevant sales and distribution employees. We are aware that this may lead to restrictions or even bans on delivering certain goods, technology, software or providing certain services.

We make notifications to the authorities promptly and in line with legal requirements.



# 10 Implementation of the Code of Conduct

Each individual employee is personally responsible for abiding by the law.

**The Code of Conduct is published online and is therefore accessible to all employees.**

- Every employee in the MAPAL Group undertakes to observe this Code of Conduct and to comply with its principles during completion of their daily tasks.

**Managers shall ensure that this code is complied with by the employees they supervise.**

- Every manager undertakes to inform and make their employees aware of the content and importance of this Code of Conduct.
- Managers are contact persons for their employees and shall support them in acting lawfully to the best of their ability.
- If there is evidence that laws have been violated, this must be dealt with rigorously.



**Managers promote a compliance culture based on trust, transparency and appreciation.**

- Managers authentically exemplify MAPAL's values and set a good example. They avoid personal conflicts of interest in particular.
- They show their employees that they take potential compliance risks seriously and instructions in this regard are of great significance for protecting the company.
- When communicating with their employees, managers show themselves as being open to discussion and to differing opinions.
- When risks are identified, they initiate necessary changes and act carefully and transparently when doing so.



# 11 Contact persons for information

All employees are expected to seek advice and assistance from their supervisors, the relevant department, the worker representation body or the compliance organisation if they have any concerns about the legality of their own actions or if there are signs of legally dubious processes in their working environment.

An overview of contact persons for compliance issues as well as further information can be found online and in the intranet under "Compliance".

All concerns are taken seriously. The person making the report does not have to worry about any disciplinary action or sanctions, even if the supposed misconduct cannot be confirmed.

Deliberately false or malicious allegations to defame other people will not be tolerated. Reports can also be made anonymously. If the informant wishes to remain confidential, this will also be guaranteed.





