



**Menschen  
machen  
MONTAPLAST.**

## **MONTAPLAST Code of Conduct**

GUIDANCE FOR ETHICAL AND SUSTAINABLE BEHAVIOR

## Preamble

The provisions of this Code of Conduct apply to all employees, managers and managing directors of MONTAPLAST GmbH.

This Code of Conduct provides guidance and sets out the values, principles and actions that determine our behavior as responsible company. It describes our responsibility as a member of the society, as a business partner and at the workplace.

Our aim is to comply with ethical standards and to create a working environment that promotes integrity, respect and fair conduct. A strictly legal and principled business policy serves the long-term interests of the company.

We expect all employees to familiarize themselves with the provisions of this Code of Conduct and all other company guidelines and to consider them within all decisions.

This Code of Conduct has been adopted by the managing directors of MONTAPLAST GmbH and is regularly reviewed and updated.

August 2024

C. A. Stulz

R. Eble

R. Graf

C. Kuhn

## Content

Our Responsibility in Society .....	4
Human Rights.....	4
Environmental and Climate Protection .....	4
Social Commitment .....	4
Our Corporate Responsibility.....	5
Fair Working Conditions .....	5
Compliance with Laws and other Regulations at Home and Abroad .....	6
Bribery and Corruption.....	6
Competition Law .....	6
Conflict of Interest.....	6
Internal Knowledge.....	6
Handling Company Assets.....	7
Confidentiality and Data Privacy .....	7
Intellectual Property.....	7
Financial Integrity.....	7
Our shared Responsibility .....	8

## Our Responsibility in Society

At MONTAPLAST, we regard it as our duty to act in an economically, socially and environmentally conscious manner. We comply with all applicable laws, guidelines and standards of the markets we operate in. MONTAPLAST is committed to the United Nations (UN) Global Compact on Corporate Responsibility and its principles in the areas of human rights, labor, environment and anti-corruption. Fulfilling the ten principles of the UN Global Compact and implementing them in our daily activities is not an obligation for the people at MONTAPLAST, but a conviction.

### Human Rights

At MONTAPLAST, we respect human dignity and regard respect for fundamental human rights as a matter of course.

We expressly and sustainably support the internationally recognized human rights (UN Human Rights Charter UN-DOC. 217). Even in the event of disciplinary measures, all employees must be treated with dignity and respect. Disciplinary measures may only be taken in accordance with applicable national and international standards and internationally recognized human rights.



We ensure that human rights, such as the prohibition of torture and cruel, inhuman or degrading treatment, are strictly ob-

served when engaging and using private or public security forces. Life and limb are not harmed and freedom of association and freedom of association are not impaired.

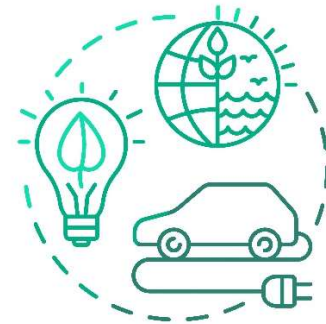
We respect land, water and resource rights of indigenous peoples and local communities and ensure that we protect, support and respect them in accordance with the "United Nations Declaration on the Rights of Indigenous Peoples".

### Environmental and Climate Protection

At MONTAPLAST, we pay attention to the goals of sustainable environmental protection. In this context, we strive to use environmentally friendly production methods. In accordance with the principles of the UN Rio Declaration, we use natural resources responsibly.

Our environmental and energy management system helps us to constantly reduce our operational resource consumption and continuously improve our energy-related performance. This includes the reduction of greenhouse gases and the minimization of harmful soil changes, water and air pollution or harmful noise emissions.

Our guiding principle here is the United Nations' "2030 Agenda for Sustainable Development".



In addition,

at MONTAPLAST, we take care to comply with all applicable national and international environmental and nature conservation laws and all other relevant regulations. We ensure that hazardous materials and waste are labeled, handled, transported, stored, reused, recycled and disposed of in accordance with the applicable laws and regulations. The utmost care is also taken in the procurement of raw materials and minerals. We are aiming to protect our natural resources and use them responsibly in order to reduce our ecological footprint.

### Social Commitment

At MONTAPLAST, we want to promote the economic and social development of our community. In our social commitment, we therefore focus on our roots and support regional initiatives and organizations that are committed to charitable, sustainable, educational and cultural issues.

## Our Corporate Responsibility

### Fair Working Conditions

At MONTAPLAST, we behold great value in our employees. We demand a high level of commitment from them and share our business success in return.

MONTAPLAST's personnel policy contributes to offering every employee the opportunity for professional and personal development. Open exchange of opinions, criticism and ideas are encouraged. In addition, the following principles apply at MONTAPLAST:

### Child Labor

At MONTAPLAST, we reject child labor and any kind of exploitation of children and adolescents (minors). The relevant laws are complied with.

### Forced Labor

At MONTAPLAST, we reject any form of forced labor, bonded labor, servitude and slave labor or modern slavery. Company employees must not be forced into employment directly or indirectly through either violence or intimidation.

### Remuneration and Employee Rights

All employees receive a fair wage in accordance with the applicable collective agreements. Remuneration is paid in a practical manner and an appropriate pay slip is provided. Employees' rights to freedom of association, freedom of assembly, and collective bargaining are respected in accordance with the law.



### Working Hours

Our working hours comply with applicable national law.

### Privacy

At MONTAPLAST, we respect the privacy of everyone we meet in the course of our work.

### Harassment

At MONTAPLAST, we disapprove of physical, psychological or sexual violence or any other form of harassment.

### Health and Safety at Work

At MONTAPLAST, we all work together to ensure a safe and healthy environment. Therefore, safety regulations and practices must be strictly adhered to.

We comply with national and international regulations to ensure health and safety in the workplace. Appropriate systems are in place to avoid risks to health and safety.



### Freedom of Association

At MONTAPLAST, we respect and promote the right of our employees to freedom of association and the right to collective bargaining. Employees are entitled to join or form a trade union without the threat of discrimination or retaliation.

### Freedom of Expression

At MONTAPLAST, we guarantee the right to freedom of opinion and expression.

### Discrimination

At MONTAPLAST, we do not discriminate in hiring or employment, including discrimination based on race, ethnic or national origin, color, gender, sexual orientation, mental or physical disability, age, creed, affiliation with an employee organization or other personal characteristics.



### Compliance with Laws and other Regulations at Home and Abroad

At MONTAPLAST, we comply with applicable laws and other relevant regulations in Germany and abroad in all our business decisions and actions. Integrity and honesty promote fair competition, also in relation to our customers and suppliers.

As a globally active company, we trade worldwide and comply with all applicable national and international tax, customs and export control laws and regulations. In particular, economic and trade sanctions regulations, embargoes against certain countries, companies or persons and bans on certain exports and imports must be complied with.

Every employee at MONTAPLAST

must observe these control regulations when products are purchased, manufactured or placed on the market. We also carry out appropriate checks on our business partners.



### Bribery and Corruption

At MONTAPLAST, we are against corruption and bribery. We do not tolerate ways of doing business that use improper means. MONTAPLAST employees must not offer, receive or accept any benefits from business partners that could lead to an impairment of an objective and fair business decision or even give the appearance of such an impairment.

### Competition Law

At MONTAPLAST, we support all efforts to promote and protect free competition, including the legitimate protection of intellectual property and marketing rights.

Competition laws - also known as antitrust laws - serve to protect free competition. They prohibit business conduct that is aimed at preventing, restricting or distorting competition or that has the effect of doing so. This includes, for example, price fixing or the division of market segments or customers. Violations of competition law are subject to severe penalties. In addition to the responsibility of MONTAPLAST as a

company, employees who are partly responsible for violations of competition law may also be subject to penalties.

### Conflict of Interest

At MONTAPLAST, we expect loyalty to the company. All employees must avoid situations in which their personal or financial interests conflict with those of MONTAPLAST. For this reason, it is particularly forbidden to take an interest in competitors, suppliers or customers or to enter into business relationships with them in a private context if this could lead to a conflict of interest. The interests of MONTAPLAST must not be impaired by conflict situations.

Such conflicts of interest can arise in many situations: For example, no employee may accept benefits - in any form whatsoever - that could reasonably be expected to influence MONTAPLAST's business decisions or transactions. Invitations must remain within the limits of customary business hospitality. Further regulations can be found in the applicable business travel policy. Employees should not personally gain direct and/or indirect advantages through access to confidential information due to their position at MONTAPLAST. All employees have a duty to promote the legitimate interests of MONTAPLAST as far as possible. Any situation of competition with the company must be avoided. Any actual or potential conflict of interest must be reported and discussed with the line manager concerned.

### Internal Knowledge

At MONTAPLAST, we feel obliged to ensure a fast and smooth exchange of information within the company. Information must be passed on correctly and completely to the departments concerned, unless in exceptional cases, in particular due to confidentiality obligations, there are overriding interests. Relevant knowledge must not be unlawfully withheld, falsified or selectively passed on.



Dishonest reporting within the company or to external organizations or persons is strictly prohibited. All MONTAPLAST financial statements and annual reports, business documents and accounts must accurately reflect accounting events and transactions and comply with legal requirements and MONTAPLAST's accounting policies and internal accounting procedures.

### Handling Company Assets

At MONTAPLAST, we are all collectively responsible for the proper and protective handling of company property. Every employee is obliged to protect the property of MONTAPLAST against loss, damage, misuse, theft, embezzlement or destruction. Every employee has a duty to inform his or her superior immediately of any use of assets contrary to the above.

### Confidentiality and Data Privacy

At MONTAPLAST, we treat all personal information about employees, customers, business partners and suppliers as well as other third parties very carefully, confidentially and in full compliance with data protection laws.



Much of MONTAPLAST's business information is confidential or legally protected, so there is a duty of confidentiality. The protection of this information must be fulfilled with the utmost care. This does not apply if publication of the information has been approved by MONTAPLAST or is mandatory due to laws or regulations.

The duty of confidentiality relates in particular to intellectual property. This includes trade secrets, patents, trademarks and copyrights, but also business and marketing plans, designs, business papers, salary data and all other unpublished financial data and reports.

### Intellectual Property

At MONTAPLAST, we protect the intellectual property of customers and employees through appropriate technical and organizational measures. Internal regulations prevent counterfeit parts from being put into circulation. These regulations must also be guaranteed by suppliers.



### Financial Integrity

At MONTAPLAST, we document completely, comprehensibly and correctly in accordance with the legal and regulatory requirements for proper accounting and financial reporting. We emphasize transparency, accuracy and adherence to deadlines in order to maintain our financial and legal integrity, reputation and credibility. Financial statements and books, records and accounts are part of the company's records and therefore represent company property and important assets. All employees are responsible for the creation, use, management, secure storage and, where appropriate, secure destruction of such records. All such actions are to be carried out only in accordance with the company's policies, standards and procedures and current legal requirements.

## Our shared Responsibility

The rules contained in this Code of Conduct form a core component of MONTAPLAST's corporate culture. Consistent compliance with these principles is essential.

To ensure this, we encourage everyone to take responsibility and report violations. This means reporting violations of laws, regulations and internal guidelines that originate from our company, managers and employees or our suppliers or subcontractors. Reports help to uncover violations and thus prevent or at least reduce damage.

If an employee has any concerns or complaints about any of the matters set out in this Code of Conduct or has knowledge of any breach of the



Code of Conduct contained herein, they should report this immediately to their line manager for clarification.

If an observed violation or suspicion concerns the employee's own line manager, the employee can report it at any time via one of the other reporting channels.

These are; the managing directors directly, the HR department, the compliance officer or the works council. In addition, any violations can be submitted via our reporting system

<https://montaplast.integrityline.com>.

Information can be provided anonymously or in a confidential manner.

At MONTAPLAST, we investigate all reports and examine them carefully in a fair procedure. Violations of our Code of Conduct are not tolerated and will result in consequences. MONTAPLAST will not tolerate retaliation for complaints made in good faith under this Code of Conduct. We guarantee protection from retaliation .

All employees, managers and managing directors are bound by the rules of this Code of Conduct. Violations lead to consequences. Any actual or potential violation must be reported. In serious cases, this may lead to termination of the employment relationship.

MONTAPLAST Code of Conduct

© MONTAPLAST GmbH  
Krottorfer Str. 25  
51597 Morsbach  
[www.montaplast.com](http://www.montaplast.com)