



## Code of Conduct for suppliers

### I. Preface

The CABKA Group is an international group with subsidiaries in Germany, Belgium, Spain and North America (hereinafter together referred to as "CABKA"). Through innovative solutions and continuous development, CABKA has made a special name for itself with the high-quality and sustainable processing of plastic. The name "CABKA" stands especially for pioneering and inventive spirit, diversity and innovation.

CABKA is committed to ethnic, legal, socially responsible and sustainable corporate governance. We expect the same behavior from all our suppliers.

The CABKA Code of Conduct for Suppliers (hereinafter referred to as "Code") applies to all companies of CABKA and describes the essential requirements which are expected from our suppliers regarding compliance with laws and regulations, corruption and bribery, social and working conditions, child labor and environment. We expect our suppliers to share this commitment and make reasonable efforts to promote compliance with the principles of this Code among our own suppliers and subcontractors.

A violation of the Code may be the reason and occasion for CABKA to terminate business relations including all associated supply contracts.

CABKA expects its suppliers to comply with applicable national and international laws and regulations including the International Labor Convention ("ILO") and the United Nations Universal Declaration of Human Rights, industry standards and all other relevant legal requirements. If there are legal provisions or other rules in individual countries where Supplier operates that differ from the requirements of the Code, the stricter requirements in each case shall be complied with.

## **II Requirements for suppliers**

The Code of Conduct applies to all employees of the supplier. In the event of non-compliance with this Code of Conduct, the supplier is obliged to take measures and sanctions, which can be of both an operational and legal nature. Every employee of the supplier must assume responsibility for compliance.

CABKA expects its suppliers to recognize the basic rights of their employees and to commit themselves to respect them and to treat employees with dignity and respect, in accordance with the understanding of the international community. In particular, the suppliers comply with the following provisions:

### **1. exclusion of forced labor and human trafficking**

No forced labor or similar work may be used. Slavery and human trafficking are strictly prohibited. The supplier is obliged to apply the zero tolerance principle of CABKA. All work must be voluntary and employees must be able to terminate their work or employment at any time. Furthermore, no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment, may take place.

### **2. ban on child labor**

Child labor must not be used in any phase of production. Suppliers are requested to adhere to the recommendations of the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be lower than the age at which compulsory schooling ends and in any case not lower than 15 years. If children are encountered at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected and special protective regulations must be observed.

### **3. fair wages**

Remuneration for regular working hours and overtime must be in line with the national legal minimum wage or the industry minimum standards, whichever is higher. In all cases, the remuneration for overtime must exceed the remuneration for regular hours. Employees must be granted all benefits prescribed by law. Deductions from wages as penalties are not permitted. Supplier shall ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

#### **4. fair working hours**

Working hours must comply with applicable laws or industry standards. Overtime is permitted only if it is voluntary and does not exceed 12 hours per week, while employees must be given at least one day off after six consecutive working days. Weekly working hours shall not regularly exceed 48 hours.

#### **5. export and import regulations**

Supplier will comply with all applicable import and export control laws, including, but not limited to, sanctions, embargoes and other laws, regulations, governmental orders and policies that control the transfer or shipment of goods, technology and payments.

#### **6. freedom of association**

The right of workers to form and join organizations of their choice and to bargain collectively must be respected. Employee representatives must be protected against discrimination. They must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

#### **7. non-discrimination**

Discrimination against employees in any form is not permitted. This applies, for example, to discrimination based on gender, race, caste, skin color, disability, political conviction, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

#### **8. health and safety at work**

The supplier is responsible for a safe and healthy working environment. By establishing and applying appropriate occupational safety systems, necessary precautions are taken against accidents and damage to health that may occur in connection with the activity. In addition, employees are regularly informed and trained on applicable health and safety standards and measures.

### **III. Ecological Responsibility**

CABKA expects its suppliers to comply with all applicable laws and regulations as well as internationally recognized standards for environmental protection.

#### **1. environmental permits**

Supplier shall ensure that all necessary environmental permits and approvals are obtained, kept up to date and complied with in order to act in compliance with the law at all times.

#### **2. resource consumption, avoidance of environmental pollution and waste minimization**

The supplier undertakes to optimize the consumption of natural resources, including energy and water. Sound measures are taken to prevent pollution and minimize the generation of waste, waste water and air emissions. Waste water and waste will be appropriately labelled and treated in accordance with applicable laws and regulations before discharge or disposal.

#### **3. hazardous substances and product safety**

Supplier undertakes to label hazardous substances, chemicals and materials and to ensure safe handling, movement, storage, recycling, reuse and disposal. All applicable laws and regulations relating to hazardous substances, chemicals and substances must be strictly observed. Substance restrictions and product safety requirements established by applicable laws and regulations are mandatory.

## **IV. Ethical Business Conduct**

CABKA expects its suppliers to comply with all applicable laws and regulations regarding corruption, fraud and prohibited business practices.

### **1. fair competition**

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which prohibit in dealing with competitors, in particular agreements and other activities that influence prices or conditions. Furthermore, these regulations prohibit agreements between customers and suppliers which are intended to restrict customers' freedom to determine their own prices and other conditions when reselling.

### **2. confidentiality, data protection**

The supplier undertakes to meet the reasonable expectations of his client, suppliers, customers, consumers and employees with regard to the protection of private information. The supplier must observe the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting and passing on personal information.

### **3. intellectual property**

Intellectual property rights must be respected; technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected. The supplier commits himself neither to violate nor to copy the intellectual property of third parties in his work for CABKA. In order to avoid plagiarism accusations against himself, the supplier is obligated to check every activity internally as well as from external consultants with regard to a possible infringement of third party intellectual property.

### **4. integrity, bribery, taking advantage**

The highest standards of integrity must be applied to all business activities. The supplier must pursue a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcement must be in place to ensure compliance with anti-corruption laws.

## **5. conflicts of interest**

CABKA attaches great importance to the strict separation of private and business interests. Personal relationships or interests of the supplier or his representatives must not influence business activities at CABKA. Actual conflicts of interest and even the appearance of a conflict of interest must therefore be avoided.

Suppliers must avoid all conflicts of interest while working for CABKA. A conflict of interest exists when a representative of a supplier attempts to positively influence his personal interests or those of a friend or relative due to his position as a representative of the supplier. Suppliers must report any situation of potential or apparent conflict between their personal interests and the interests of CABKA.

## **6. financial responsibility, proper accounting**

The supplier has undertaken to keep proper accounts. The bookkeeping is correct and transparent and meets all requirements of applicable laws. Should an error occur, this must be reported immediately to the management so that the error can be corrected.

At the supplier's site, key business processes are properly documented and relevant financial information is captured to faithfully reflect the business operations with complete reports.

Supplier's employees who, in the course of their work, collect or transmit accounting or financial data, calculate and transmit indicators or manage and disseminate other types of information must ensure that such data, indicators and information are correct, reliable and honest.

## **V. Implementation of the requirements**

We expect our suppliers to identify risks within their supply chains and take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier will inform us promptly and, if necessary, regularly about the identified violations and risks and the measures taken.

CABKA verifies compliance with the standards and regulations listed in this document by means of a sustainability audit at suppliers' production sites. The supplier agrees that CABKA may carry out such audits to verify compliance with the Code of Conduct at the supplier's production sites during normal business hours after reasonable advance notice by persons authorized by the supplier.

Disclosure of Information: Supplier shall fully disclose information regarding working conditions, health and safety at work, environmental practices, business activities, structure, financial situation and economic development of the Company in accordance with industry practices.

## **VI. Maintaining identity and protection against retaliation**

The supplier is responsible for establishing an effective complaints mechanism at the plant level for individuals and communities that may be affected by adverse impacts.

In case of doubt as to the fulfillment of the above obligations and in order to avoid improper activities, the supplier's employee(s) must contact a direct supervisor/manager or, if justified circumstances exist, the compliance officer(s) responsible for the supplier.

The Supplier assures to protect all employees who submit a complaint report from threats, harassment or other adverse measures within the company. Supplier further affirms that whistleblowers have no reason to fear termination.

## **VII. Acknowledgement and agreement of the supplier**

By accepting the order, the supplier agrees to the Code and undertakes to comply with all requirements and principles listed. The Supplier also undertakes to communicate the content of the Code in a comprehensible manner to its employees, agents and subcontractors and to take all necessary precautions for the implementation of the requirements.