



CODE OF CONDUCT

FRÖTEK - Kunststofftechnik GmbH
An der unteren Söse 24 – 30
37520 Osterode am Harz

hereinafter referred to as "FRÖTEK"

Independence, innovation, and responsibility are fundamental values that result from our corporate policy. They are expressed, for example, in the preservation of the legal and financial independence of the FRÖTEK Group, in sustainable thinking and action, and in the perception of our social responsibility: they are supporting pillars that contribute significantly to the stability and growth of the company.

An indispensable prerequisite for their continued existence is compliance by all employees with statutory and internal company guidelines. To ensure compliance, it is essential to establish structural elements that provide adequate information, protect against misconduct, and ensure legally compliant action.

The present CODE OF CONDUCT, as one of these structural elements, describes essential principles that are binding for all of us. Basic requirements for our legally compliant and ethical behaviour are laid down here.

The management is responsible for the content and publication of the CODE OF CONDUCT. The CODE OF CONDUCT is regularly reviewed to determine whether revisions are needed due to changes in laws and guidelines, and, increasingly, to better ensure that we can all meet high ethical and legal standards.

President - Martin Fröhlich

1. Company principles and scope

The following company principles apply to all employees of FRÖTEK-Kunststofftechnik GmbH.

These principles express the self-commitment that we as a company enter to meet our legal, social, and societal responsibilities. The principles complement the corporate policy and strategy and are binding for each of our employees in their daily activities. Every manager must demand and encourage compliance. In the event of non-compliance, reasonable consequences, including labour law and disciplinary measures, are to be expected. Serious violations can also result in criminal and liability law consequences.

FRÖTEK expects that suppliers (i.e., every contractual partner who supplies FRÖTEK with goods, materials, or services) and their employees act responsibly and commit themselves to the basic principles set out in this FRÖTEK CODE OF CONDUCT. If the suppliers commission third parties (e.g., subcontractors or representatives) within the framework of their business relationship with FRÖTEK, FRÖTEK expects that these third parties also commit to the basic principles laid down for suppliers in this FRÖTEK CODE OF CONDUCT.

FRÖTEK reserves the right to check compliance with the FRÖTEK CODE OF CONDUCT on site in individual cases, particularly regarding compliance with data protection laws.

2. Compliance

We comply with the law in Germany and in all countries in which we do business. When in doubt, we would rather forego achieving a goal than break the law.

3. Fair competition

We identify with fair competition as the mainstay of the social market economy and adhere to the laws to protect competition. We therefore undertake to observe the rules of fair competition. Collusive agreements with competitors or suppliers, on, for example, prices, offers, customer allocation, sale or purchase conditions, production or sales quotas, geographical areas of interest, are not tolerated.

4. Corruption

We do not tolerate corruption or other unauthorized business practices on the part of employees, or third parties commissioned by us. We do not offer, solicit, or accept, directly or indirectly through third parties, any benefits or other advantages that could impair our ability to make objective business decisions. Donations to public officials, suppliers, employees, representatives of state institutions, politicians, or mandate holders and candidates for political offices are absolutely prohibited.

4.2 Plagiarism

It is ensured that only original products/no replicas and copies(plagiarism) are used or supplied.

5. Dealing with customers

Customer orientation is one of the central principles. It is our responsibility within the framework of company processes to contribute to customer-oriented behaviour with the greatest possible care and to prevent any possible negative effects on customers. Every employee is a representative of the company and thus contributes to the external perception of the company. This applies to employees who have personal contact with customers.

6. Protection of company and business secrets

Company and business secrets must be treated with absolute confidentiality. Sensitive information of any kind must not be used to pursue one's own interests or made available to third parties. This obligation continues to apply after the termination of the employment contract if there are corresponding conditions in the employment contract.

Confidentiality also applies to information that we receive from business partners. The respective applicable regulations and internal company guidelines must be consistently observed, for example, the minimum requirements for information protection and our guidelines for the use of the internal network, the Internet, and social media.

We also require that our suppliers and other business partners maintain confidentiality.

6.2. Financial responsibility / accurate record

All business transactions are conducted transparently and correctly reflected in the company's financial report and the documents submitted.

7. Company Property

Company property and all work equipment provided by the company must only be used for business purposes and must be handled properly. It is expressly forbidden to sell or lend company property without permission or to use it for non-company purposes.

8. Human rights and employee welfare

We respect and uphold recognised human rights and do not tolerate any behaviour that disregards them.

We despise and do not tolerate any form of child labour and forced labour!

We comply with all laws that prohibit discrimination, in particular based on gender, age, skin colour, religion, or disability. This principle applies to all personnel decisions such as recruitment, hiring, employment, training, job changes, promotions, compensation, benefits, disciplinary actions, and terminations. Sexual harassment and other harassment in the workplace are not tolerated.

We respect the right of employees to freedom of association, freedom of assembly and collective bargaining.

We uphold the legal requirements about remuneration and the maximum permissible working hours.

9. Cooperation and communication

We promote a structure and a work environment that stimulates cooperation and in which all employees treat each other with respect and dignity. We also take responsibility for delays and errors where no support is requested or where requested support is not provided.

We maintain and observe a polite and respectful manner in all forms of oral and written communication - in meetings, telephone calls, letters, emails, chats, etc.

10. Data protection

The protection of the personal data of our employees, customers and business partners is important to us. Therefore, we collect, store and process personal data only to the extent that is necessary for defined, clear and legally permitted purposes. Confidential employee data must not be passed on to anyone outside the company without appropriate authorization or legal

basis. We support the security of data and processing processes through appropriate technical and organizational measures.

11. Environment and Sustainability

We are aware of the importance of the environment for our next generation and act accordingly.

We are committed to the sustainable protection of natural resources.

Compliance with the relevant laws and regulations is an indispensable requirement that we also expect from our business partners.

12. Health and safety at work

The safety of our employees is a central requirement of our business activities. We avert risk to our personnel through preventive occupational safety and support the health of our employees through good working conditions.

Occupational safety is part of the personal responsibility of every employee. Hazards are to be avoided through anticipatory, prudent, and safety-conscious behaviour. Any hazards or deficiencies must be reported to the responsible manager as soon as possible.

13. Whistleblowing

In the event of serious abuses, every employee has the right and the duty to report them to management. We guarantee that an appropriate investigation will be initiated in accordance with the Whistleblower Protection Act and that the reporting employee will be protected from retaliation. Notifications can be sent to the following address.

hinweis@froetek.email