

# Joma-Polytec GmbH's Code of Conduct for Suppliers

## **Fundamental principle: we, as a company, and each of us individually, are responsible for complying with binding commitments and internal guidelines**

All employees of Joma-Polytec GmbH are personally responsible in their working environment for compliance with all binding obligations and internal guidelines. The observance of binding obligations and internal guidelines, as well as the resulting lawful and integral conduct, has the highest priority at Joma-Polytec GmbH.

We are responsible for our products and our work and their impact on our employees as well as on society, our business partners and the environment. In order to live up to this responsibility, we must all act in accordance with the law, with honesty and responsibility.

Within their area of responsibility, our managers, in particular, ensure that legal requirements and the principles of our company are observed. We expect all employees to comply with the law.

We also expect our business partners to comply with the binding obligations and guidelines listed here, and to communicate these to their business partners and demand their compliance with them.

## **Social and corporate responsibility**

### **Human rights**

We respect and support internationally recognised human rights. Between our employees and when in contact with our business partners, we value a climate characterised by mutual respect, trust, tolerance, fairness and equality. We respect the dignity, privacy and personal rights of each individual.

### **No forced labour and no child labour**

We reject all forms of forced labour, as well as child labour. All work undertaken within Joma-Polytec GmbH must be performed of a person's own free will. In doing so, we are committed to the abolition of slavery, forced labour and exploitative child labour. The minimum age for admission to employment in accordance with state regulations is observed at Joma-Polytec.

### **Non-discrimination, equal opportunity and inclusion**

We do not tolerate any form of discrimination based on gender, skin colour, religion, age, nationality, social and ethnic origin, membership of a minority, ideology, sexual orientation, political or trade union activity, or disability. These principles apply to recruitment, to existing employment relationships, to fair remuneration as well as to the professional advancement of our employees. Only performance, personality, abilities and aptitude are decisive in this respect.

We support an inclusive culture of diversity in which every employee is able to achieve their full potential and is appreciated.

### **Remuneration and working conditions**

We are aware of our social responsibility vis-a-vis our employees and are committed to rates of pay and social benefits that are competitive and which comply with local laws, including laws on minimum wages, calculation of overtime hours and statutory social benefits.

We ensure that working hours, including overtime, are in accordance with local laws that regulate working hours.

### **Collective bargaining**

We are not a member of the employers' association ('Arbeitgeberverband'). However, we have aligned ourselves with the collective agreements reached within the industry.

### **Welfare, health and safety of employees**

Safety at the workplace, the maintenance and promotion of health, performance and job satisfaction of our workforce are central to our corporate activities.

At Joma-Polytec GmbH, we pay close attention to the applicable legal regulations and standards for a safe and health-promoting working environment and take appropriate measures to ensure this. In their work, our employees are obligated to implement the statutory regulations and internal guidelines on occupational health and safety.

### **Freedom of assembly**

Our employees are able to communicate openly with management about working conditions without fear of reprisal, intimidation or harassment. Workers have the right to assemble freely in order to join workers' organizations or a works council in accordance with local law.

### **Protection of young workers**

Special importance is attached to the protection of young workers. Statutory requirements regarding working hours, night work and work assignments must be complied with at all times. Young workers must be protected from working conditions that have harmful effects on their health, development or safety. School attendance must not be impacted by work.

### **Ethical recruiting of new employees**

New employees are recruited and employed in accordance with applicable laws. All unethical recruiting methods, such as misrepresenting the type of work, the charging of application fees or the destruction/retention of identity documents, are strictly prohibited.

### **Harassment**

We do not tolerate any form of harassment, such as mental or physical coercion or verbal abuse, inhumane treatment, sexual harassment and any physical punishment of our workforce.

### **Land, forest and water rights and eviction**

We oppose all forms of wrongful eviction or confiscation of land, forest or water for the creation of production and business spaces.

### **Private or public security forces**

We strictly prohibit using private or public security forces to enforce and protect business projects that use methods which violate human rights.

## **Business ethics of Joma-Polytec GmbH**

### **Fair competition and antitrust law**

All employees of Joma-Polytec GmbH are obligated to comply with the relevant regulations of antitrust and competition law. Joma-Polytec prohibits any conduct that pursues (or has the objective) of hindering, restricting or distorting free and fair competition.

Our competitive position is based solely on our entrepreneurial success factors, in particular, our innovative ability, quality, reliability and fairness. For this reason, we always act in compliance with antitrust law when dealing with competitors, business partners and end customers. In particular, the following shall not be tolerated:

- Contracts, agreements or understandings with actual or potential competitors for the purpose of fixing prices and premiums, limiting the nature or quantity of products or services supplied or sharing markets;
- Abuse of a leading position in a given market;
- Agreements or contracts on a vertical integration level (with suppliers or customers), if they pursue the intention (or have the effect) of preventing or restricting free and fair competition, contrary to the applicable laws.

### **Prohibition of all forms of corruption**

We do not tolerate any form of corruption or bribery in our global business activities. Corruption is prohibited by international conventions, national laws and internal guidelines. Joma-Polytec GmbH does not tolerate any

forms of bribery or business conduct that could create the impression of undue influence on employees and business partners.

All employees of Joma-Polytec are prohibited from directly or indirectly demanding, accepting, offering or granting advantages in business dealings if this is intended to influence business processes in an inadmissible manner, or if such an impression could be created. Especially in business dealings with public officials and authorities at home and abroad, we ensure that our employees behave with integrity.

Facilitation payments are generally not tolerated. Facilitation payments are payments to an official that are not provided for by law and which are intended to induce the official to expedite or perform a service to which an entitlement, in principle, exists.

### **Gifts, invitations and other benefits**

When dealing with benefits, such as gifts or invitations, we take strict care to avoid any appearance of dishonesty or impropriety. We do not tolerate any benefits that could raise doubts concerning our integrity or influence business decisions.

### **Factual decision-making and conflicts of interest**

We make decisions after proper consideration and in the interest of the company. We assume that business decisions are not influenced by private or personal interests. At Joma-Polytec GmbH, we make decisions only on the basis of appropriate considerations and in the interest of the company. We take care to avoid even the appearance of extraneous considerations. We expect our employees to remain objective in all circumstances and to ensure that their judgement is not influenced by personal or family interests.

### **Import and export controls, as well as economic sanctions**

In all our international business relations, we adhere to the currently valid principles underpinning global foreign trade. We comply with all applicable export and import control regulations and rules, as well as temporary restrictions on foreign trade, such as economic sanctions or embargoes.

### **Complete and truthful documentation and financial responsibility**

We undertake to comply with all our documentary obligations. The documentation must be complete, truthful, timely and correct. Any reporting, whether digital, verbal or written, must follow the same rules of integrity.

The legally required retention periods (or those otherwise agreed with the customer) for data must be guaranteed by suitable storage and backup for the guaranteed period.

We prepare complete and accurate reports on all financial transactions, processes and data and make them available to the responsible auditors.

### **Protection of information and personal data**

When Joma-Polytec GmbH uses or processes sensitive data, we apply a principle of confidentiality which is centred around information security and data privacy.

We, therefore, ensure that sensitive information and company secrets are adequately protected by our employees and are not passed on to unauthorised individuals. To the same extent, this principle of confidentiality applies to our business partners and their sensitive data.

We also respect and are committed to protecting the privacy of our workforce and business partners. The use of (and access to) personal data will only occur for specific purposes in accordance with applicable law and by authorised personnel.

### **Intellectual property**

As part of ensuring a fair global supply chain and keeping with the original intention of the inventor, we accept and respect all different forms of intellectual property. We do not tolerate any unauthorised use or reproduction of patents, scientific work, written works, as well as symbols, trademarks and images.

### **Protection against counterfeit and substandard parts and plagiarism**

We take reasonable care to ensure that our components are not counterfeited, they do not fall into the hands of unauthorised third parties and cannot be distributed by unauthorised means. In this way, we support our endeavour that only original, tested and qualitatively perfect goods reach the end customer and counterfeit products are prevented.

### **Principle of sustainability**

Another integral part of the Code of Conduct is the following energy and environmental policy of Joma-Polytec GmbH. The requirements must be adhered to and communicated accordingly within each individual supply chain.

## **Energy and environmental policy of Joma-Polytec GmbH**

### **Principle of sustainability**

We respect the natural basis of life on our planet and are committed to conserving resources and reducing the environmental pollution of air, water and soil. This commitment to sustainable environmental protection is the basis for our work.

To this end, we comply with all applicable laws and regulations, are guided by the norms and standards in place, and we develop and design our products in an environmentally compatible manner. We constantly strive to reduce the negative environmental impact of our operating processes and continuously improve our energy and environmental performance. We want to use these binding commitments we have set for ourselves to act as a role model and thus pass on our requirements within the international supply chain.

## **Proactive environmental protection and continuous reduction of negative environmental impacts**

As far as it is achievable using state-of-the-art technology that is economical reasonable, our goal is to use technical and organisational measures to help make our company climate-neutral by 2040. All negative environmental impacts caused by us and our supply chain should also be steadily reduced on a constant basis.

### **Decarbonisation and reduction of greenhouse gases**

We want to reduce our carbon emissions and continuously reduce other climate-active gases by using renewable energies and sustainable sources of energy and by increasing our level of efficiency. In order to achieve the overall goal of being “Climate neutral by 2040”, a road map for climate neutrality was created specifically for this purpose. We thereby undertake to be climate neutral by 2040 at the latest and intend to do so by achieving different milestones, which include in particular:

- 2025 Electricity purchased from 100% verifiable renewable energy (Scope 2)  
Introduction of climate-neutrality road map for suppliers
- 2030 Direct carbon emissions and indirect carbon emissions generated by purchased electricity should be reduced by 80% in comparison to 2019
- 2040 Climate neutrality of Joma Polytec (Scope 1, Scope 2 and Scope 3)

The goals defined here are communicated annually to responsible bodies through a predetermined reporting system and compared with actual degree of achievement.

### **Soil, air and water quality protection and noise reduction**

In all our business endeavours, we are determined to protect the environment at all times in order to preserve the quality of the air, water and soil and to keep it at a high level. Any incidents requiring reporting in relation to environmental protection are reported by us to the responsible authorities.

The noise caused by traffic, production processes or other business activities may not exceed the permissible limit and is to be reduced on a continual basis.

### **Responsible management of hazardous materials**

The responsible management of hazardous materials allows for negative environmental impacts caused by the use of chemicals to be reduced to a permissible and acceptable limit. Key elements in managing hazardous materials include the approval and clearance of hazardous materials as well as their use and storage and proper disposal.

### **Biodiversity, land use and deforestation as well as animal protection**

We are interested in protecting natural ecosystems and their flora and fauna by pursuing economic activities within our supply chain.

If animals must be worked with within one of our supply chain processes, legal requirements regarding animal protection must be adhered to.

### **Sustainable awareness and increase of energy and environmental efficiency**

Within our organisation, sustainability can only be achieved together as part of an ongoing process to improve. All our employees must therefore be made further aware of such, and the efficiency of our processes must also be improved.

### **Personal awareness**

Every employee at Joma-Polytec GmbH plays a part in the company's environmental footprint. A sustainable company culture can only be achieved if all employees are conscious of their impact on the environment and know of the influencing factors and how to act accordingly. In order to raise awareness, sustainability-related training events and information offers are provided and carried out regularly.

### **Energy efficiency**

Energy efficiency plays a major role in the procurement, operation and maintenance of plant and equipment. Energy consumption is a key criterion in the procurement of equipment. Potential suppliers are made aware that this is a criterion of the tendering process and may be decisive for the awarding of a contract. Energy-efficient operation is taken into consideration for plant operation.

### **Process optimisation**

We continually optimise existing and future production processes, products and plants in terms of their environmental impact and energy efficiency.

Annual energy and environmental projects are intended to improve the company's energy- and environmental-related performance on a constant basis. The focus here is placed on the energy consumption of our plants and the reduction of negative environmental aspects.

### **Sustainable resource management**

A minimalistic approach is taken when it comes to using all types of natural resources. Only as many resources should be used as are absolutely necessary. A special focus is placed on water consumption, since having access to clean water is very vital to our ecosystem.

### **Recycling and waste reduction**

As long as recycling can comply with technical and safety parameters, we want to recycle as many resources as possible in the production of our products and operating our processes.

We are guided by the five principles of waste management when it comes to disposing waste. The following disposal procedures are listed in descending order of priority and must be observed:

Reduction of waste, direct recycling of waste, recycling by the disposer, incineration for energy recovery, and disposal in landfills as the last resort of disposal.

### **Material compliance**

#### **Sustainable and responsible purchase of commodities and materials**

We are committed to ensuring that all commodities and materials we source comply with relevant legislation in force, such as REACH and POP, and that we comply with industry regulations communicated to us by the customer, such as RoHS. Prohibited or restricted substances are handled in accordance with these regulations and communicated within the supply chain in compliance with the law.

When using so-called 'conflict minerals' and their derivatives, we ensure that these materials are sourced responsibly.

The basic requirement for working with us is the compliance to this Material Compliance Guideline within our supply chain. We expect our suppliers to provide a smooth flow of information in regard to material compliance, and we also guarantee this to our customers and business partners.

### **Compliance with the Supplier Code of Conduct and whistleblowing, protection of whistleblowers**

The Code of Conduct has been drawn up and written by Executive Management. Absolutely all employees of Joma-Polytec GmbH must comply with the binding obligations listed.

Violations of this Code of Conduct must be reported internally to the Compliance Officer for review and follow-up. Joma-Polytec has implemented a complaints management system for such violations to be reported. The system can also be used anonymously if desired.

The company's Executive Directors assure all whistleblowers of their full protection if they report wrongdoing.

Bodelshausen, 27/03/2023

Dr Maute  
Managing Partner