

# Code of Conduct

ENNEATECH AG



## «What we do today decides what the world will look like tomorrow.»

MARIE VON EBNER-ESCHENBACH

This powerful quote inspires our work every day. As ENNEATECH AG, we and our entire team are passionately committed to a sustainable future: ecological products, fair cooperation and long-lasting business relationships.



# Dear readers,

Sustainability is not an abstract concept at Enneatech AG, but our founding principle and the most important benchmark of our daily work.

Environmentally friendly products, responsible business practices and an appreciation of one another – these are principles that are firmly anchored in our DNA. Here we also call it «being fit for grandchildren».

Our special focus and heartfelt concern is to use the Earth's resources sensibly and sparingly. Since 2009, we have therefore been creating plastics with a future, from raw materials with a past. We are the pioneers in the production of recycled plastic that is in no way inferior to virgin materials in terms of quality. In this way, we enable important industries to significantly reduce their carbon footprint without having to make technical compromises.

We use our know-how and innovative strength to help shape an economy that is sustainable and thus viable in the long term. We succeed in this because our employees and business partners make responsible decisions every day, on both a small and a large scale. From the sourcing of raw materials to the delivery of the final product, we take bold new paths to operate in harmony with nature, never at its expense.

This Code of Conduct summarises in one document the principles and values that have shaped our actions since our founding and will continue to do so in the future. This is what we orientate ourselves by, every day. The following principles of conduct apply equally to all Enneatech employees – the Board of Directors as well as the staff – and can only be implemented through the commitment of each and every individual.

We also make this Code of Conduct available to our business partners. We regard compliance with the principles described therein, insofar as they are transferable to other companies, as well as applicable laws and regulations, as the basis for a lasting joint business relationship.

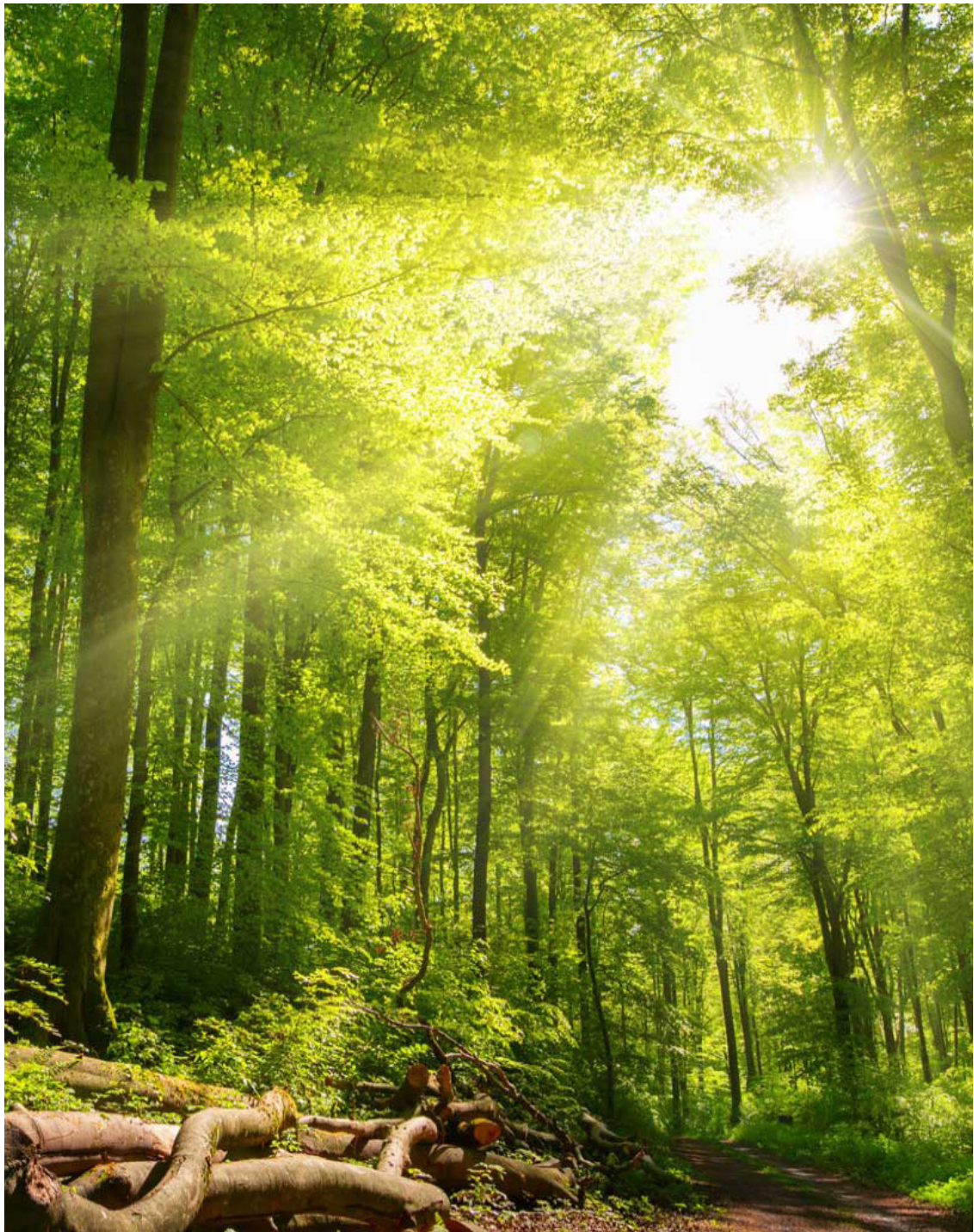
Thank you all for your dedication and commitment, which makes it possible for us to live by the following values on a daily basis.



Hartmut Schoon  
Chairman of the Board,  
ENNEATECH AG

## **We want to have a positive impact on our environment. This is what we work for every day.**

With our recycled plastic granules and compounds, our customers save up to 90% CO<sub>2</sub> compared to virgin material. In this way, we are making an active contribution to the decarbonisation of industrial manufacturing.



## Human rights

We endorse, value and abide by the United Nations Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms. We reject forced labour, child labour and slavery. Discrimination and human rights violations are not tolerated in our company. This applies to cooperation within Enneatech as well as with our suppliers, external service providers and customers.

## Environmental protection

Environmental protection is at the core of our business model and part of our DNA. Compliance with applicable environmental protection laws and regulations is therefore a matter of course, and our actions go far beyond this. With our products, we not only try to minimise our own environmental impact, but also to make an active contribution to a more resource-efficient economy. We design our production and administrative processes to be as efficient and energy-saving as possible. We are DIN EN ISO 50001 and ISO 14001 certified – two important foundations for our energy and environmental management. However, we are never satisfied with the status quo: We are constantly optimising our processes and never stop working on innovative, environmentally friendly product and production ideas. We regularly organise informative and practical training sessions with our employees to enable them to implement a sustainable lifestyle in their private lives as well. Because sustainability is a core component of our culture.

## Social engagement

We are a northern German company and have strong ties to our home region. This is also reflected in our local engagement, through donations and social activities with our employees. In doing so, we support institutions and projects that share our values and our love of nature. These include health-promoting activities for our employees and their families, social projects such as an inclusive future playground not far from our factory premises, and local festivities that contribute to the appreciation and preservation of Nordic nature.

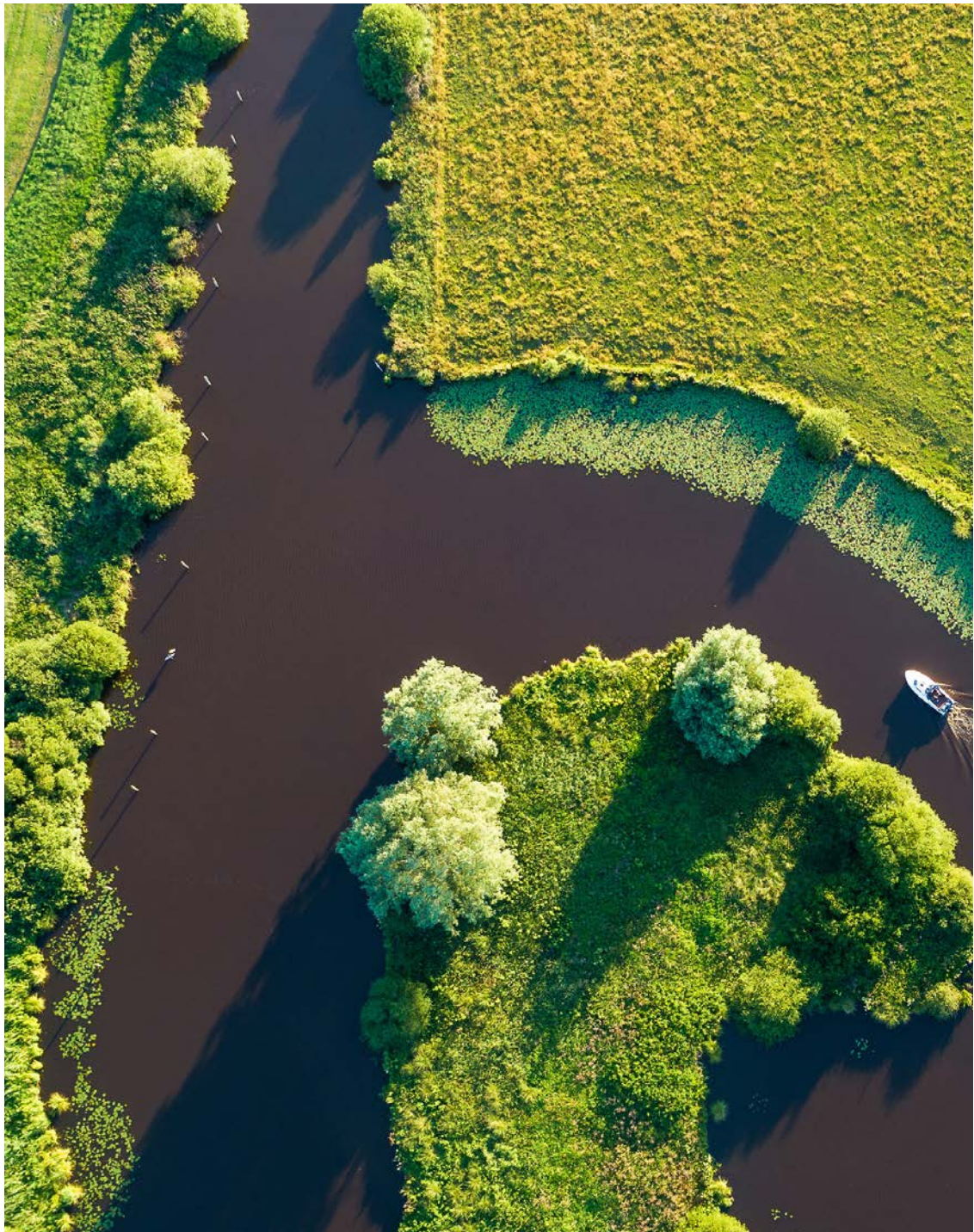
## Product safety and conformity

The safety of our products and conformity with laws and standards have the highest priority. We naturally comply with the legal and official regulations applicable to our products. These include the European chemicals regulation REACH, the regulation on persistent organic pollutants (POP), the RoHS Directive, and the US chemical legislation Toxic Substances Control Act (TSCA) as well as all other directives applicable to our products. When it comes to quality assurance, we leave nothing to chance and have established processes through which our quality management is involved in every step of the work. Our quality management system is certified according to DIN EN ISO 9001:2015.

In addition, we are committed to establishing new, still missing or insufficiently defined standards for recycled materials and, of course, we also comply with them. This includes, for example, all data quality level labels according to DIN SPEC 91446 as well as DIN SPEC 91481.

# We are responsible business partners, doing the right thing every day: fair, open and honest.

A trusting cooperation. This starts with ourselves and extends into each of our business relationships.



## Donations: Gifts and invitations

We do not, under any circumstances, accept or give gifts, hospitality, invitations or favours that could compromise our independence and integrity. The appropriateness of such donations should be critically examined by the parties involved in each individual case, in particular as to whether conflicts of interest exist or could arise. If there is any uncertainty, our Compliance Reporting Office can be contacted for advice.

## Corruption and money laundering

Corruption and money laundering have no place at Enneatech. They are illegal, prevent progress and innovation, distort competition and harm society. We therefore strictly reject all forms of corruption. We consistently exclude dirty money from our business. We expect integrity and honesty from all employees and business partners.

We practise a transparent corporate culture that rejects any form of bribery or deception and see it as a matter of course to comply with all applicable laws. We carefully verify the identity of our suppliers, other business partners and customers to ensure that we only deal with reputable partners who share our values.

## Fair and free competition

We value fair and free competition and comply with applicable competition and antitrust laws. Our success is based on innovation, quality and convinced customers, not on unfair competitive practices. We act in accordance with this performance principle based on a free market economy.

## Financial accounting

Our accounting and financial reporting are carried out in accordance with legal requirements and are treated with the utmost care and precision. All our employees share the responsibility of organising processes so that the accounting department can record all financial data correctly and on time. We publish our figures in accordance with the applicable accounting regulations.

## Import and export regulations, taxes and customs duties

We trade globally, from sourcing raw materials to supplying to international customers. In doing so, we are aware of our social responsibility and comply with all rules of foreign trade, tax and customs law. We design internal structures and processes in such a way that the taxes and customs duties to be paid can be determined completely, correctly and on time, recorded in reporting and paid to the responsible tax authorities.

## Purchasing

We carefully select our suppliers and service providers. In doing so, we avoid any conflicts of interest and are guided by factual and objective criteria. We are committed to complying with the Supply Chain Act and ensure responsible sourcing practices in our supply chain.

## Communication and marketing

We also practise honesty in communication. With employees, business partners, existing and potential customers, and the media. Our marketing messages are formulated transparently and unambiguously. We do not greenwash and ensure that our sustainability messages are accurate and true. We do not want to jeopardise the trust of our partners and customers by doing anything. Every form of external communication is therefore discussed with the respective departments concerned and checked for accuracy.

Our employees do not publish company messages on their own. Requests for public comments will be passed on to the Communications Department. Private statements made by our employees at events or on the internet may not reflect the company's opinion. We trust our colleagues to express personal opinions in a considered and clearly delineated manner.

## We value each other and know that great performance is always a collective effort.

We work together in an open and honest manner. Together, we carry our sustainability philosophy far beyond our products and never stop learning. For example, at a joint vegan cooking class or a visit to the Ökowerk.





## Occupational health and safety

We bear responsibility for the health and safety of our employees and take this very seriously. Through continuous optimisation and active support services, we ensure safe working conditions and also promote the health of our employees beyond this. In the same way, we expect each and every employee to comply with occupational health and safety regulations for the sake of their own safety and that of their colleagues.

## Equal treatment and equal opportunities

We practise diversity. Equal treatment is one of our core values and we offer equal opportunities to all our employees, regardless of gender, religion, sexual orientation, origin or other affiliations. The selection, recruitment and promotion of our employees is always based on their qualifications and skills.

## Data protection

We protect the privacy and personal data of employees, former employees, customers, suppliers and other data subjects. In accordance with legal regulations, we collect and process personal data only in accordance with consent or other legal bases and take care to store it responsibly. We comply with all applicable data protection laws and regulations.

## Protection of intellectual property / trade secrets

Our technical know-how is unique and the basis of our successful and innovative products. The protection of our company and business secrets is therefore immensely important and is a prerequisite for all employees and other persons with knowledge of such confidential information. Conversely, we also recognise the intellectual property of our business partners, competitors and other third parties. Confidential information is strictly protected at ENNEATECH.

## IT security

To ensure IT security and the security of electronic data processing (EDP), we adhere to the applicable regulations and use current technologies and programmes. We train our employees to prevent unencrypted and thus insecure data exchange.

## Dealing with business assets

ENNEATECH's tangible and intangible property may only be used for operational purposes and to achieve its business objectives. We handle business assets carefully and efficiently.

## Avoidance of conflicts of interest and compliance with the German Corporate Governance Code

We avoid situations where conflicts of interest may arise and always act in the best interests of our company. We are also committed to complying with the German Corporate Governance Code and promote efficient and responsible corporate governance.

## Employee representation and rights

Our employees naturally have the right to form or join trade unions and employee representative bodies. We are committed to an open, constructive and trusting cooperation with these representative bodies and always strive to consider all interests fairly.

## We support each other and also address concerns openly.

Despite these guidelines, situations may arise in which it is not immediately clear how to behave properly. We have therefore set up an e-mail address that you – employees, business partners, customers or outsiders – can contact with questions or if violations are observed.

E-mail of the compliance advisory service: [code-of-conduct@enneatech.com](mailto:code-of-conduct@enneatech.com)

## We practise a working culture where questions, concerns and uncertainties can be addressed openly.

We want to continue cultivating that. Therefore, please do not hesitate to contact us if you have any doubts. This way, we can protect our company together and, if necessary, also address what is wrong.