

# **Code of Conduct**

With this Code of Conduct, the Schollglas Group intends to define in more detail the principles that it understands necessary for its business activities. Principles of ethical and legal standards are indispensable in business and must be followed at all levels.

This Code of Conduct applies to all companies in the Schollglas group of companies (Schollglas).

#### 1. Compliance with laws

Schollglas complies with applicable laws and regulations in all countries in which Schollglas does business. These include, in particular, recognised human rights regulations, occupational health and safety laws, anticorruption laws, data protection laws, competition laws, antitrust laws and environmental laws.

### 2. Avoidance of conflicts of interest

Schollglas takes care to avoid conflicts of interest as much as possible. To the extent that conflicts of interest could arise, Schollglas will try to counter such conflicts of interest in each individual case with precautionary measures in order to prevent them from arising.

#### 3. Fair competition

Schollglas will continue to engage in honest, fair, responsible and merit-based competition. Schollglas does not engage in or tolerate inadmissible competitive practices or unlawful agreements under antitrust law.

Schollglas also does not tolerate any active or passive bribery or acceptance of advantages. Corruption and inadmissible forms of political influence will not be tolerated or supported by Schollglas. Only gifts on special occasions that have grown out of tradition on a small scale are tolerated.

Criminal acts during competition will not be tolerated by Schollglas.

# 4. Money Laundering Prevention

Schollglas complies with all relevant legal regulations on the prevention of money laundering and does not participate in money laundering activities.

#### 5. Equal treatment and non-discrimination

Schollglas promotes diversity in the company and does not tolerate any unequal treatment or discrimination in the employment of employees (ILO Conventions No. 100 and No. 11). Only an objective reason can justify unequal treatment in individual cases, insofar as this is in accordance with the statutory provisions.

# 6. Occupational Health and Safety / Forced Labour

Schollglas strictly rejects child labour and complies with the applicable provisions prohibiting child labour (ILO Conventions No. 138 and No. 182).

Schollglas does not tolerate forced labour in any form and does not use any kind of forced labour (ILO Conventions No. 29 and No. 105).

Schollglas also ensures that workers are not subjected to inhuman or degrading treatment, corporal punishment or similar effects.

The safety of people, especially employees, is important to Schollglas.

For this reason, Schollglas offers a safe and healthy working environment, safety-related measures and the safety of their products and services.

Schollglas eliminates and minimises, as far as possible and reasonable, all hazards in the working environment, on the basis of the general state of knowledge in the field of safety and health for the respective sectors of Schollglas's activity.

Schollglas complies with the applicable laws and standards on occupational health and safety and working hours.

#### 7. Workers' rights

In accordance with the respective national legislation, Schollglas respects the rights of employees to form an employee representation by free election and to conduct collective bargaining on behalf of employees as well as to set in for the protection of the rights of employees in the respective affiliated companies.

Schollglas remunerates its employees appropriately and in accordance with the respective national laws and standards.

As far as possible and reasonable, Schollglas uses to perform work on the basis of a regular employment relationship, as defined by the respective national laws.

#### 8. Sustainability and environmental protection

Schollglas complies with all relevant environmental laws and current environmental standards.

Schollglas is aware that sustainability of production and business activities should be achieved as far as possible and reasonable.

In this context, Schollglas strives to develop products that are as recyclable as possible, to avoid waste or to recycle it in the best possible way before possible disposal, and, as far as possible and reasonable, to handle resources such as water and energy carefully and to continuously optimize the use of resources.

Schollglas complies with all legal regulations, guidelines and regulations in the field of regulated substances, such as the REACH Directive, the ROHS Directive, the CLP Regulation, etc.

With regard to so-called conflict minerals, Schollglas also complies with the relevant legal regulations and regulations, such as the EU Conflict Minerals Regulation (Regulation (EU) 2017/821), the US Dodd-Frank Act, etc.

#### 9. Product safety

The safety, reliability, quality and performance of the products is essential for Schollglas. All Schollglas products must therefore comply with the national and international legal standards, technical standards such as DIN standards and association standards, as well as internal quality guidelines.

#### 10. Confidentiality and data protection

Schollglas complies with all legal regulations on data protection. The confidentiality of company and business secrets is maintained by Schollglas and its employees.

#### 11. Export/Import and Sanctions

With regard to its global business orientation, Schollglas ensures compliance with all applicable laws and regulations for the import and export of goods, services and information as well as the applicable embargoes and sanctions.

Barsinghausen, 24.11.2023

### Schollglas Holding- und Geschäftsführungsgesellschaft mbH

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