

Code of conduct

The following regulations of the so-called Code-of-Conduct describe the basic principles and requirements of EppsteinFOILS to its business partners with regard to ethical, moral and social principles of corporate management out of responsibility towards people and the environment. At the same time, they are an obligation for every employee in the company. The business partner / supplier undertakes to comply with the following principles:

I. General

- **Compliance with existing laws**
Compliance with statutory regulations and norms forms the basis of our actions.
- **Prohibition of corruption and bribery, invitations**
We consider ourselves obliged to refrain from any form of granting or receipt of favours, be these directly connected to our business activities or be these offered by third parties. We only accept gifts and invitations if they are minor (< 10€) and the acceptance would be an expression of polite and generally accepted business practice. Gifts (>10€) that cannot be refused due to local customary courtesies and practices are to be reported to the management, which will decide on the further handling/whereabouts. Business meals in a generally customary context are permissible.
- **Prohibition of pricing agreements, fair competition**
Market and/or pricing agreements are prohibited.
- **Conflicts of interest, closely related persons**
Conflicts of interest, in particular with related parties, that could influence existing business relationships, are to be avoided.
- **Compliance with principles throughout the supply chain**
We actively endeavour to comply with the code of conduct throughout our supply chain. During this process, we also accept proof that our business partners have their own code of conduct.
- **Conflict minerals**
We have imposed reasonable measures of an obligatory nature on our suppliers to exclude the use of conflict minerals (Congo Declaration, Dodd-Frank Act etc).
- **Confidentiality**
We take organizational measures to protect business information from access by third parties. We strictly prohibit the disclosure of information to third parties, except for justified business purposes.
- **Data protection and data security**
Integrity and availability, protection against misuse and loss of data, and the handling of personal data are of great importance to us. Through organizational measures, we ensure that the relevant requirements are implemented at our company.

II. Work and social

- **Health and safety of employees**
We consider ourselves responsible for the health and safety of our employees when they are at work and actively promote this.
- **Respect for basic rights**
We undertake to:
 - respect the diversity of the people who work for us,
 - guarantee equal opportunities for all employees and applicants in relation to the selection process and professional development, pay, social benefits and internal

transfer and career opportunities. ensure that only ability, experience and personal suitability are the decisive criteria for selection,

- refrain from all forms of discrimination, for example due to: Gender, age, origin, religion, sexual orientation, visual characteristics, health, disability, political activity, trade union membership etc;
- refrain from all behaviour which could infringe the dignity of an individual person.
- **Prohibition of child labour**
Child labour is prohibited. The corresponding regulations of the ILO (International Labour Organization) must be complied with.

III. Environment and Climate

- **Efficient use of resources**
We work on the basis of a certified environmental management system and also expect that our business partners take measures to avoid and/or reduce impact on the environment and/or develop relevant management systems which actively promote this approach.
- **Respect for our environment**
Our company is located in the immediate vicinity of the residents of Eppstein. We therefore feel a special obligation to take into account as much as possible any neighbourhood concerns as much as possible in the course of our operations.
- **Environmental, Social and Governance (ESG) Standards**
In view of global challenges such as climate change, scarce natural resources and inadequate social conditions, we are open to further improvements in terms of environmental and climate-related, social and ethical moral standards.

This document replaces the most recently valid version from 2019. We reserve the right to adjust the principles and requirements above which we expect on the part of our business partners in accordance with the subsequent development of legal, socio-political or economic norms.

Eppstein, January 2022



Managing Director/CEO