

### Preamble

ECOMAL Europe GmbH and its European affiliates of the ECOMAL Group (hereinafter referred to collectively as “ECOMAL”) are legally, socially, and ethically committed to a form of corporate management where responsibility is assumed for people and the environment. ECOMAL regards fair competition as the basis for a functioning economy and ECOMAL does want to contribute to it with its standard setting.

ECOMAL is committed to ensuring fairness, honesty and integrity with its business partners and employees in accordance with these values.

To realize its corporate values, ECOMAL expects its business partners to observe and permanently implement the values as established in this Code.

If ECOMAL becomes aware that its business partners are failing to observe these requirements in their business activities, ECOMAL shall contact them in writing and ask them to change their behavior in a timely manner, to comply with these values. ECOMAL reserves the right to act and even terminate the business relationship in the event of serious proven violations.

### 1. Compliance with Laws and Regulations

ECOMAL acts in accordance with all applicable national and international laws and regulations. The laws and regulations observed by ECOMAL include exemplarily the provisions set forth in Regulation (EC) No. 1907/2006 (REACH) and Directive 2011/65/EU (RoHS), applicable trade control laws, applicable laws on the protection of personal data, applicable antitrust and competition laws, and all laws and regulations related to the values expressed in this Code.

### 2. Human Rights and other Humanitarian Principles

ECOMAL acts in accordance with the United Nations Charter for Human Rights (UN Charter for Human Rights). ECOMAL respects the personal dignity, the privacy and any other personal human rights of each individual.

#### Equal Opportunities

ECOMAL rejects all forms of discrimination. ECOMAL does not discriminate against anyone based on their sex, age, nationality, skin color, origin, physical or mental constitution, sexual orientation, disability, political ideology or religious beliefs.

#### Forced Labor

ECOMAL rejects any form of forced labor. Company employees must not be forced to work – either directly or indirectly – using physical or psychological violence, intimidation, or any other inappropriate pressure.

### Conflict Minerals

ECOMAL sets itself the goal of committing suppliers to comply with the international rules prohibiting trade in conflict minerals (especially Section 1502 of the “Dodd-Frank Wall Street Reform and Consumer Protection Act”) to contribute to observance of these rules.

### Occupational Health and Safety

ECOMAL acts in accordance with the labor and social standards of the International Labor Organization (ILO). ECOMAL takes appropriate measures to create and maintain a safe and healthy workplace.

### Fair Working Conditions

ECOMAL pays all employees a fair, regular, and contractually agreed wage in accordance with the respective minimum wage requirements. ECOMAL undertakes to comply with the applicable laws on working hours and particularly does not put any pressure on its employees to induce to work overtime.

### Child Labor

ECOMAL rejects all forms of child labor. ECOMAL does not hire any employees who cannot prove they are of the respective legal minimum age. Employees under the age of 18 are not asked to perform dangerous work and are subject to special protection.

### Freedom of Association

ECOMAL guarantees the freedom of association. Employees are granted the right to safeguard their labor rights and interests.

## 3. Prohibition of Corruption and Bribery, Antitrust Law and Unfair Competition

ECOMAL does not tolerate any form of bribery or corruption. Employees must ensure that no personal dependencies or obligations are developed vis-à-vis business partners or governmental policymakers. Employees must particularly refrain from accepting and offering any gifts that may reasonably be considered to affect the business decisions. This generally applies to all monetary gifts, regardless of the amount.

ECOMAL rejects all forms of anti-competitive collusions and all forms of abuse of a dominant market position.

## 4. Environmental Protection

ECOMAL takes a precautionary approach by aligning its business activities with the goals and standards of sustainable, future-oriented and resource-saving environmental protection.

ECOMAL is certified to the standards of DIN EN ISO 14001. ECOMAL constantly endeavors to improve its own contribution to environmental protection.

### 5. Data Protection

ECOMAL respects the privacy and integrity of its business partners and employees. ECOMAL observes the data protection principles of transparency, purpose limitation, data accuracy, data minimization, storage limitation, integrity, confidentiality, and accountability. ECOMAL has appointed a Data Protection Officer to ensure compliance with data protection law.

#### ECOMAL Europe Group



Alexander Dziadur

Managing Director



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