Supplier Code of Conduct

Verhaltenskodex für Lieferanten

CODE DE CONDUITE DES FOURNISSEURS

供应商 行为准则

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We do it. Better.



1. We create added value for our customers.

We are a reliable partner for our customers.

Our products and services are ecologically sound and are designed with the environment and the future in mind.

We keep to our agreements.

We comply with the legal specifications, the requirements of the standards and our voluntary commitments.

We inform interested parties about our activities in an open and transparent manner.



2. We are successful because of our employees.

We look after the health of our employees, and provide safe workplaces.

We have defined the duties, competencies and responsibilities for every employee.

We are committed to providing our employees with continuous development opportunities and training.

We lead in an appreciative and clear manner and encourage personal responsibility.

We make accountable decisions.

We provide comprehensive information and encourage open dialogue.



3. We actively design our future with creativity and innovation.

We know the trends and future topics that are relevant to us and align ourselves proactively with them.

We embrace change, and take the risks and opportunities into consideration.

We encourage creativity, suggestions and ideas.

We consistently drive forward with digitisation and climate neutrality.



4. We achieve excellent results in the long term.

We continuously improve our management system and our processes, and provide the necessary resources for doing this.

We minimise our climate impact, conserve resources and avoid environmental pollution.

We are economically successful and are therefore independent and ready for the future.

We measure our actions against the results and control them using unequivocal key figures.



We create added value for our customers.

We are a reliable partner for our customers.

• We are a family-run company with more than 65 years of experience in plastics processing

• We endeavour to maintain long-term customer and supplier relationships

• For us, that means delivering 100 % of goods in perfect condition in line with the agreed specifications, in the agreed quantity and at the agreed time, without fail

• Customer information and data is treated confidentially

Our products and services are ecologically sound, and are designed with the environment and the future in mind.

• By consciously using more PCR and PIR materials and modern production methods, such as thermoplastic foam injection moulding and precise MuCell processes, we reduce the consumption of materials and preserve resources

• The use of recyclate, PCR and PIR materials reduces the carbon footprint of our products

• We develop our products with recycling in mind

• Increased use of sprue grinders. Use of hot runner tools wherever possible

• Use of competent processes to minimise product defects, reduce wastage and preserve resources

• We focus on sustainability and energy efficiency during the manufacture and procurement of products and services

• We want to make our production line carbon neutral in the future, e.g. by means of in-house power generation

• We make use of sustainable construction, e.g. green roofs, solar power systems, rain water usage, etc.

We keep to our agreements.

• We keep our word, which applies to both verbal and written agreements

• Compliance with agreed customer requirements, such as QAA, test agreements, specifications, drawings, etc., is a given

• All company employees adhere to the relevant laws (e.g. German Penal Code, German Commercial Code, laws and regulations on data protection) and contractual obligations

We comply with the legal specifications, standard requirements and our voluntary commitments.

• Our Code of Conduct is compulsory for all of our employees and suppliers

• Compliance with management system requirements is crucial in our day-to-day work

• We are committed to manufacturing safe, legally compliant products

• We fulfil our compulsory obligations, particularly any applicable legal requirements

• We observe the legal obligations and other requirements for occupational health and safety

• Our integrated information security system supports compliance with laws and regulations, ensuring the availability, confidentiality and integrity of information

We inform interested parties about our activities in an open and transparent manner.

• We inform interested parties about relevant topics using various media.

- Code of Conduct = Web site
- Company policy = Web site, Q.wiki, CAQ.net
- Social networks = LinkedIn, Facebook, Pöppelmann TV (YouTube), Yammer, Instagram

- Sustainability Report = Homepage, PPinside
- Company magazine "PPInsidePrint"
- Leaflets
- PPX - Information rounds

• The responsible authorities are informed in the event of any food safety violations

• We regularly inform interested parties, neighbours and the public about our activities in environmental protection – environmental statement on web site and PPinside

• We avoid any loss of reputation or damage to the company's image with our activities in the area of information security



We are successful because of our employees.

We look after the health of our employees, and provide safe workplaces.

• The health of our employees is very important to us. This is why we support our employees with benefits such as: Health promotion through Hansefit, company healthcare, Business Bike, stretching exercises, homoeopathic substances from our "Apotheke Gottes" pharmacy, Talingo EAP employee advice, road safety training, ergonomic workstation design, blue-light glasses for employees working with screens, PPMenu, salad kitchen, etc.

• Reviewed/approved process descriptions and a risk-based approach allow us to ensure that our employees have a safe working environment

• Occupational health and safety is our top priority. We provide healthy working conditions which rule out risks and ensure that our employees have maximum safety. We identify risks that are hazardous to health in order to avoid any adverse effects on the health of our employees.

• Near-accidents are reported and used to develop measures to eradicate any risks.

• Information security safeguards personal rights and company secrets.

We have defined the duties, competencies and responsibilities for every employee.

• We use organisational charts, job descriptions and process descriptions to control and assign employee responsibilities.

• Every employee is responsible for quality. We hold regular meetings with employees in order to motivate them and encourage quality and environmental awareness.

• We maintain an open dialogue with our employees in order to have a common understanding of occupational health and safety issues. The consultation and participation of the employees is of the utmost importance to us. We therefore collaborate closely with the works council.

• Officers are appointed for various topics to support the management and the employees in their areas of expertise.

• All employees and managers are aware of their responsibility when using IT, and support the security strategy to the best of their abilities.

We are committed to providing our employees with continuous development opportunities and training.

• Employee training is an important component for maintaining and acquiring new skills. Employees and their managers are responsible for obtaining the relevant skills that are required at the workplace. Various company-wide activities are carried out for this purpose.

• Pöppelmann offers various opportunities for employee development. These include, for example, attending internal and external seminars and courses, internal managerial training, cost-

sharing for professional development and the PPAkademie, an academy which provides a wide range of digital courses, and also several Pöppelmann in-house seminars.

• Qualification and training by means of recognised quality management courses, e.g.: quality manager training, general and division-specific qualification, e.g. VDA auditor, BRC and GMP system auditor, problem-solving techniques (5-Why, 8-D, Ishikawa analysis).

• Qualification and training by means of recognised courses. Occupational safety specialist training.

• A training concept for information security is fundamental for regular awareness measures.

We lead in an appreciative and clear manner and encourage personal responsibility.

• Managers take part in the manager training programme. Annual employee meetings

• Compliance with the Code of Conduct

We make accountable decisions.

• Decisions are made based on figures, data and facts. Where appropriate, we communicate internally using our information platforms such as the PPinside intranet, PPX info rounds, shop-floor stand-up meetings and notices, etc.

• Decisions are arrived at and documented on the basis of the agreed product specifications and standards as part of a risk-based approach.

• Information security is dealt with by a continuously working team, safeguarded and communicated to the employees.

We provide comprehensive information and encourage open dialogue.

• Relevant business information is shared both internally and externally with interested parties at regular intervals. In order to do this, we use:

• PPX information rounds

• Staff meetings

• “PPinside” and “PPinsidePrint” communication media

• Shop-floor stand-up meetings

• Notice board for notices

• Management System Q.wiki, CAQ.net

• We report on relevant quality events, the results of audits and certifications, complaints and evaluations by our customers.

• We maintain an open dialogue with our employees for common understanding of environmental safety and occupational health and safety issues. The consultation and participation of the employees is of the utmost importance to us.

We provide information about our projects and activities in the information security area at regular intervals.

• We endeavour to maintain long-term customer and supplier relationships

• For us, that means delivering 100% of goods in perfect condition in line with the agreed specifications, in the agreed quantity and at the agreed time, without fail

• Customer information and data is treated confidentially

Our products and services are ecologically sound, and are designed with the environment and the future in mind.

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• The use of recyclate, PCR and PIR materials reduces the carbon footprint of our products

• We develop our products with recycling in mind

• Increased use of sprue grinders. Use of hot runner tools wherever possible

• Use of competent processes to minimise product defects, reduce wastage and preserve resources

• We focus on sustainability and energy efficiency during the manufacture and procurement of products and services

• We want to make our production line carbon neutral in the future, e.g. by means of in-house power generation

• We make use of sustainable construction, e.g. green roofs, solar power systems, rain water usage, etc.

We keep to our agreements.

• We keep our word, which applies to both verbal and written agreements

• Compliance with agreed customer requirements, such as QAA, test agreements, specifications, drawings, etc., is a given



We actively shape our future with creativity and innovation.

We know the trends and future topics that are relevant to us and align ourselves proactively with them.

• Internationalisation

• Circular economy for plastic products

• E-mobility; participation in standardisation committees and professional associations

• Circular Plastics Alliance

• Proactive adaptation of our management system to fulfil the requirements of the relevant management system standards and customer requirements.

• Use of new QM tools.

• Use of new testing procedures.

• Carbon footprint

• We proactively report on risk-related technical developments.

• We regularly inform interested parties, neighbours and the public about our activities in environmental protection – environmental statement on web site and PPinside

• We avoid any loss of reputation or damage to the company's image with our activities in the area of information security

We embrace change, and take the risks and opportunities into consideration.

• Company-wide consideration of relevant risks and opportunities.

• New markets, customers, products and manufacturing methods are assessed in relation to the required changes within the management system.

• Relevant changes are processed and documented via a change management system.

• Changes lead to new evaluations in the risk analyses. Measures derived from these analyses are then promptly implemented.

• We tackle rising energy costs with energy-saving measures and by searching for alternatives, e.g. transition to LED technology.

• Cross-discipline risk consideration of IT issues helps to derive measures for constantly improving information security

We encourage creativity, suggestions and ideas.

• The launch of Team Morgen (English: Team Tomorrow) has ensured that we fulfil the requirement for systematic processing of relevant future topics. Other activities include:

• Round table discussions

• Lighthouse projects

• Idea box

• Patent applications

• Q.wiki as an interactive QM platform for collaborative cooperation

• System for reporting suggestions, measures and targets for improvements within environmental, energy and climate management in PPinside

We consistently drive forward with digitisation and climate neutrality.

• PP-digital initiative

• Hydra

• MyWorkplace

• Electronic document storage (Doxis)

• PP Onlineshop

• Interactive management systems Q.Wiki and CAQ.Net

• Continuous processing of measurement data

We want to protect the environment, avoid any damaging impacts on the environment and constantly further develop our climate protection strategy. We have defined our targets for the circular economy and for reducing greenhouse gas emissions.



We achieve excellent results in the long term.

We continuously improve our management system and processes, and provide the necessary resources for doing this.

• Our improvement activities are methodically supported by our TEAM Morgen experts.

• We are committed to continuously improving our quality management system. The performance capability of our quality management system is reviewed at regular intervals in internal audits, customer audits and certification audits, and assessed as part of the management evaluation. We tap into any identified potential for optimisation as part of the continuous improvement process (CIP) to improve processes and therefore also the results which are achieved using these processes.

• The improvement work is carried out taking change management into consideration.

• We live and breathe the culture of continuous improvement, setting targets and constantly reviewing the implementation thereof.

• We continuously improve the management system and its environmental performance.

• Internal and external audits illustrate our progress in achieving our targets.

We minimise our climate impact, conserve resources and avoid environmental pollution.

• With our Pöppelmann Blue Strategy, we develop products for the circular economy and actively create new energy supply concepts for conserving resources and reducing our environmental impact.

• We avoid complaints, reduce wastage and conserve resources using an efficient quality assurance system and reliable processes.

• We are committed to protecting the environment and avoiding any damaging impacts on the environment.

• Our energy and environment programme helps us to use energy efficiently and use resources sparingly.

We are economically successful and are therefore independent and ready for the future.

• We safeguard our future viability by means of continuous growth and a wide range of products.

• We remain a family business in order to be independent.

• We ensure that we use efficient testing methods.

• Minimising potential for error saves money.

• Activities and defined measures are reviewed in order to ensure that we have the right cost to benefit ratio based on the requirements of the management system.

• Continuous reduction of energy consumption, e.g. by converting our lighting to LED technology.

• We reduce our dependency on energy suppliers by retrofitting solar systems.

We measure our actions against the results and control them using unequivocal key figures.

• As part of our PPX management system, we provide a framework for defining targets in a way which ensures that these can be measured and monitored, in order to support the strategic orientation of the organisation. For example, by using key figure classification, strategic annual targets and tracking key results.

• Supplier evaluations (e.g. quality, reliability) by our customers are analysed and measures are introduced where necessary.

• We actively monitor our delivery performance (quality, adherence to quantity specifications and delivery dates).

• Our corporate policy forms the framework for defining targets in environmental protection and occupational health and safety.

• We have developed key figures which allow us to evaluate and improve performance.

• KPI figures measure our progress in terms of information security.



Norbert Nobbe



Matthias Lesch



Henk Gövert

General rules

Scope of application

This code of conduct brings together the basic rules and principles which are important to us into one document. It applies to all the companies in our globally operating group of companies, and for the executive board, the management staff and each individual employee to the same extent.

Compliance with laws, regulations and ethical practices

We abide by the laws and regulations that apply in the respective countries in which we operate. The reliability and legality of our actions, our products and our processes are always a pre-condition, and are non-negotiable.

In our everyday dealings, we orient ourselves to the generally applicable ethical values and principles, particularly integrity, righteousness and human dignity.

Business secrets and confidential information

We treat commercial secrets in confidence and take the necessary steps to protect the confidential information of our business partners against access and inspection by unauthorised colleagues and other third parties in a suitable way.

Publication of information policy

We abide by the highest standards when it comes to honesty. It is imperative that the internal and external reports and documents that we produce, publish or make available to the authorities are complete, appropriate, accurate, up-to-date and comprehensible accounts. Accurate records and reports about financial information are also required to make responsible business decisions. All financial books, records and accounts must accurately reflect our transactions and events and correspond with our generally recognised accounting guidelines and our internal control system. Part of our commitment to honesty is the assurance that all of our



financial transactions are legally sound and carried out for the declared purpose that we have authorised.

Data protection and information security

The protection of personal data is of the utmost importance to us, particularly when it concerns employees, customers and suppliers. No personal data may be collected or processed without being legally permitted or without the consent of the data subject. The applicable General Data Protection Regulation (GDPR) and current amendments to statutory provisions and the guideline on how to proceed in the event of data breaches are always applied in this regard. These apply to all employees and all business divisions. Information security is binding for all employees and is continuously developed.

Financial responsibility and integrity

Pöppelmann is obliged to truthfully report to employees, customers, business partners, the public and the regulatory authorities. Our company's business transactions and records must be accurate, proper and complete. All business transactions, assets and liabilities are recorded and documented in accordance with the applicable legislation and generally accepted accounting principles. Documentation and record keeping for all business transactions require the highest level of accuracy, completeness and responsibility. Employees who record or communicate accounting or financial data, calculate/convey indicators or manage and disseminate other types of information as part of their duties must ensure that the data, indicators and information are correct, reliable and truthful.

Protection of company property and intellectual property

We use the company's property and resources appropriately and carefully. Intellectual property represents a competitive advantage



and is therefore a valuable asset which we protect against any unauthorised access by third parties (loss, theft or misuse). Tangible and intangible company property is used exclusively for company purposes and not for personal purposes, unless express authorisation has been issued. The value of intellectual property such as patents, drafts, images, trademarks, business secrets and copyrights must be recognised and respected. Technology and know-how must be transferred in a way which ensures that intellectual property rights remain protected.

Global guidelines

Our corporate group is aligned with the Universal Declaration of Human Rights of the United Nations, as well as the core labour standards of the International Labour Organisation (ILO). The following principles therefore apply in particular:

Basic rule

All members of the group and commercial partners must be treated with dignity and respect at all times. Our daily activities as a globally active commercial enterprise are always performed in line with the applicable national and international standards, and taking internationally recognised human rights into account1.



Child labour

We reject child labour and any type of exploitation of children and adolescents, and strictly comply with the relevant laws to this end.

Forced labour

We reject any form of forced labour and any conditions which are similar to it. Company employees may not be forced to work either directly or indirectly using violence or intimidation2.

Appropriate compensation

All employees should receive a fair wage for full-time employment, which at least suffices to cover basic requirements. Payments must be made in a practical way (by cash, cheque, bank transfer) and a payslip must be provided with an appropriate level of detail3.

Freedom of association and collective bargaining

All employees have the right to assemble in accordance with the applicable legislation and to form or join trade unions and employee representative bodies. They also have the right to collective bargaining for the resolution of workplace and wage matters. We give our assurance that employees who are involved in this form of unionising and/or collective bargaining will not face any negative consequences.

Working hours

Working hours are in line with applicable national legislation, industry standards or the relevant ILO Conventions4.

Occupational health and safety

The national and international regulations for the protection of health and safety at the workplace must be complied with. Appropriate systems must be set up which prevent risks to health and safety5.

If relevant emissions (e.g. noise and odour) are detected, programmes and measures are put in place to keep emissions to a minimum.

1 Universal Declaration of Human Rights – UN-Doc. 217, or UN Human Rights Charter 2 cf. ILO Conventions 29 and 105 3 cf. ILO Conventions 26 and 131 4 cf. ILO Conventions 1 and 14 5 cf. ILO Convention 155

Ethical and social principles

A culture of equal opportunity, mutual trust and respect is of great importance to us. This is why we aim to abide by the following principles in particular:

Discrimination

We treat all employees the same, irrespective of gender, age, skin colour, culture, ethnic origin, sexuality, disability, religion or ideology. We encourage equal opportunities and forbid discrimination when hiring staff, awarding promotions and providing qualifications and further training.

Human rights, anti-discrimination and strengthening of women's rights

We respect human rights and actively encourage compliance with these rights. We follow the UN Universal Declaration of Human Rights, which asks every person, every executive body and, by extension, every economic actor and business to contribute to observing these rights.

We treat all people with respect and fairness and adhere to the basic human rights, as outlined in the UN's Universal Declaration of Human Rights, for example, particularly the prohibition of forced or child labour and the provision of appropriate wages, social contributions, working hours, freedom to associate and other fair working conditions in compliance with the applicable laws.

We maintain a working environment that is free from fear of reprisal and free from discrimination, harassment and other unfair conduct based on gender, age, race, skin colour, ethnicity or nationality, religion, religious beliefs, physical or mental disabilities, veteran status, sexual orientation or other legally protected attributes.

We support the UN's Women's Empowerment Principles and believe that empowering women for unrestricted participation in all sectors of business is essential for creating stronger national economies, achieving internationally agreed development and sustainability targets and improving the quality of life for women, men, families and communities.

Diversity, fairness and inclusion policy

We promote diversity and inclusion as part of integrated, fair social progress. We want to live in a society in which the principle of diversity is lived and positively experienced by everyone, and where every person is equally represented. This is why we think that it is important to have a team which brings together numerous identities, backgrounds and perspectives.

Rights of minorities and indigenous peoples

We respect the rights of all employees, migrant workers, minorities and other protected groups, such as indigenous peoples.

Harassment

In the companies of our corporate group, no employee will be subjected to physical punishment or any other kind of physical, sexual, psychological or verbal abuse or mistreatment.

Freedom of expression

The basis for mutual trust and cooperative togetherness is an open and constructive dialogue characterised by mutual respect. Therefore, the right to freedom of expression and freedom to voice an opinion must be guaranteed.

Privacy

The right to privacy must be respected.



Sustainable environmental and climate protection

Sustainable environmental and climate protection and resource efficiency are important corporate objectives for us. When we are developing new products and operating product systems, we ensure that all effects resulting from this on the environment and climate are kept as low as possible and that our products make a positive contribution to environmental and climate protection. In this regard, every employee takes responsibility for conserving natural resources and contributing to protecting the environment and the climate through their own behaviour.

Biodiversity, land use, noise emissions

We take responsibility for resources in accordance with the Convention on Biological Diversity (CBD). We also support the principles of a fair and balanced sharing of benefits arising from the utilisation of genetic resources, as outlined in the CBD and the Nagoya Protocol.

We actively campaign to protect the air, soil and water. We identify and evaluate the organisation's significant environmental aspects. Where relevant emissions (e.g. noise and odour) are detected, programmes and measures are put in place as part of the environment management system to keep the emissions to a minimum.

Animal protection and refusal of animal testing

No animal may be bred and killed only for the purposes of manufacturing products. We do not conduct any tests on animals for research purposes or as part of product development, neither directly ourselves or indirectly through third parties. Our suppliers do not deliver any raw materials, components, parts or assemblies to us for which animal testing was used as part of research or development.



Antitrust and competition law requirements

We are committed to fair competition. For this reason, we comply with the applicable competition and anti-trust regulations.

These principles are contradicted by non-permissible agreements regarding prices or other terms and conditions, sales regions or customers, and the misuse of market power.

Every employee is required to cooperate actively in complying with and implementing fair and legal competition in their area of responsibility.

Prevention of bribery, extortion and corruption

Cases of bribery, extortion and corruption will not be tolerated. Executive board members, management staff and all employees must ensure that no personal dependencies or obligations arise towards customers or suppliers. For example, group members must not accept or give gifts in a manner which may reasonably be considered to be able to influence commercial decisions. If gift-giving is considered to be polite and customary in a given country, care must be taken to ensure that no dependencies or obligations arise as a result, and that the regulations of the country concerned are adhered to.

Violations of these stipulations will not be tolerated, and will be punished using employment law-related measures.

Avoidance of conflicts of interest

Business decisions are always made in the best interests of the company based on objective criteria, and are not influenced by personal interests or relationships. Conflicts of interest with private interests or economic or other activities, including those of relatives or other close contacts or organisations, should be avoided from the outset. If they do arise, they must be resolved in compliance with the law and the applicable guidelines. Transparent disclosure of the conflict is a prerequisite for this.

Export controls and economic sanctions

Governments and international bodies may impose temporary trade restrictions and embargoes which affect specific products and apply to countries or individuals. We comply with foreign trade legislation and regulations for import and export control and strictly observe trade restrictions and sanction lists. Another sub-area of export control is the examination of our goods for their status as dual-use goods. Dual use describes the usability of technologies



or goods for both civilian and military purposes. Export and import controls are also an important aspect in safeguarding international supply chains.

Plagiarism

It is ensured that plagiarism does not apply.

Compliance with standards by our suppliers and tier-one suppliers

Our suppliers procure goods and services in a responsible manner. Our suppliers and tier-one suppliers who directly or indirectly supply Pöppelmann with goods or services are obliged to comply with standards that are equivalent to those outlined in this Pöppelmann Code of Conduct for Suppliers. Our suppliers and tier-one suppliers must also ensure that the materials supplied to Pöppelmann come from socially responsible and sustainable sources, and that we are not taking part in business activities which cause conflicts or violate human rights.

Whistleblowing and protection against retaliation

In the event of doubt concerning the fulfilment of the aforementioned obligations and in order to avoid prohibited activities, employees may contact their direct supervisor, the Compliance Officer or an external reporting office. All reports of violations and misconduct will be treated as strictly confidential. All individuals may speak out freely and without fear of retaliation.



Compliance with the Code of Conduct

Our executive board and management staff have a special role model function, and their actions shall be assessed in accordance with the code of conduct to a particularly high level. They are the first port of call in matters concerning the understanding of the regulations, and must ensure that all employees are aware of and understand the Code of Conduct. They must prevent unacceptable behaviour as part of their management duties, and take appropriate measures to prevent violations of the regulations within their areas of responsibility.

Violations will be prosecuted uniformly and consistently. Every employee working in the Pöppelmann group, as well as every customer, supplier, service provider or external stakeholder has the right to point out any potential violations of this Code of Conduct using the methods described below.

This Code of Conduct is continuously checked to see whether it is up to date, and is updated accordingly as and when required.

The following channels may be used to report violations and information:

a. Via e-mail to compliance@poeppelmann.com

b. In writing (also anonymously) by post (Bakumer Str. 73, 49393 Lohne, Germany) or to Nadja Kampf or Jürgen Nordlohne (Compliance Officer) at the Internal Compliance Department of the Pöppelmann Group.

c. By phone +49 4442 982 1735 (Compliance Officer Jürgen Nordlohne) or +49 4442 982-1739 (Nadja Kampf)

d. External reporting offices via ombudsstelle-poeppelmann@first-privacy.com. You can send an e-mail by clicking on the following link or copying the link into your browser. Accessing the link opens a pre-filled e-mail addressed to our external ombudsman, FIRST PRIVACY GmbH.

e. Notification via the Pöppelmann whistleblower system. For more information, please visit the link on our Compliance / CSR (poeppelmann.com)

f. Data protection: internal data protection coordinator Nadja Kampf +49 4442 982-1739 NadjaKampf@poeppelmann.com; external data protection officer Peter Suhren (FIRST PRIVACY GmbH) +49 421 696632-80 office@first-privacy.com

G. For reporting human rights violations (or indications of such): Compliance / CSR (poeppelmann.com); ombudsstelle-poeppelmann@first-privacy.com; compliance@poeppelmann.com

For any further questions concerning the Code of Conduct, all employees and third parties may write to the main e-mail address compliance@poeppelmann.com.