

# CODE OF CONDUCT

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# FOREWORD

As a family-owned company, we value responsible action, respectful and trusting interaction and open dialog. In doing so, we are guided by aspects such as integrity, ethics and sustainability and take into account the relevant legal regulations.

Our Code of Conduct brings together important basic rules and principles on responsible business practices and our social and environmental responsibility in one document.

It is based, among other things, on legal requirements and international standards and agreements such as the OECD Guidelines, the UN Convention on the Rights of the Child, the Universal Declaration of Human Rights, the ILO Conventions and the Supply Chain Duty of Care Act and specifies our guidelines with regard to our responsibility for people and the environment as well as compliance with other legal provisions. Our aim is to ensure compliance with the following principles and to constantly develop them further.



Norbert Nobbé  
Managing Director



Matthias Lesch  
Managing Director

A man and a woman are standing in a factory or industrial setting, looking at a smartphone together. The man is wearing a white shirt, khaki pants, and safety glasses. The woman is wearing a patterned top, dark pants, and safety glasses. They are both smiling and looking at the phone. The background is a blurred industrial environment with blue and white machinery. A large teal circle is overlaid on the left side of the image, containing the text "RESPONSIBLE BUSINESS PRACTICES".

# RESPONSIBLE BUSINESS PRACTICES

**Compliance with high standards of business ethics is an expression of our corporate responsibility.**

### **Principle**

We comply with the laws and regulations applicable to us in order to ensure the safety and legality of our actions, our products and our processes.

### **Risk management**

We maintain a risk management system to identify, assess and monitor potential risks.

### **Communication**

We value trusting, honest, clear and respectful communication as the basis for successful collaboration.

### **Business secrets and confidential information**

We treat confidential information and business secrets confidentially and take appropriate measures to protect such information from unauthorized access by third parties.

### **Data protection and Information security**

The protection of personal data is of central importance to us. We handle personal data responsibly and securely in accordance with data protection regulations and regularly train our employees in this regard. We have published the contact details of our external data protection officer on our website. Inquiries or reports on data protection can also be directed to the internal data protection coordinator ([datenschutz@poeppele.com](mailto:datenschutz@poeppele.com)).

We are aware that we must protect our data and IT systems from unauthorized access, data loss and manipulation. We maintain an information protection concept to ensure adequate information security. When using IT, we therefore implement appropriate technical and organizational measures to avoid risks

such as damage caused by malware (viruses), loss of data or misuse of data by third parties.

### **Avoidance of conflicts of interest**

We make business decisions in the interests of the company based on objective criteria and do not allow ourselves to be guided or influenced by personal interests and relationships. To this end, we avoid conflicts of interest due to private interests or other activities of third parties, related persons or organizations. In the event of unavoidable conflicts of interest, we resolve them in compliance with the applicable laws.

### **Integrity in business transactions**

Bribery, extortion, embezzlement, fraud, corruption and money laundering are neither practiced nor tolerated by us. Business relationships may only be initiated or maintained on the basis of objective and transparent criteria. Our commercial decisions must not be motivated by private interests or relationships or by material or immaterial benefits or advantages. Gifts, hospitality or donations may not be used to unfairly influence a business relationship, to gain an improper business advantage, to achieve an unlawful business objective or to violate ethical standards. We only grant or accept gifts or benefits if they are of moderate value, do not exceed the scope of normal business practice and are a gesture of courtesy in line with normal business practices.

**Antitrust and competition law requirements**

We are committed to free and fair competition within the framework of the applicable antitrust and competition law regulations and pursue a zero-to-tolerance policy, particularly with regard to unlawful agreements on prices, other conditions, sales territories or customers and the abuse of market power.

**Trade controls and sanction regulations**

We comply with the applicable foreign trade rules and regulations on import and export controls, trade restrictions, customs regulations, embargoes and sanctions.

**Financial Responsibility**

We comply with the applicable legal requirements for proper accounting and financial reporting. In addition, we attach great importance to ensuring that our records adequately reflect the nature of the transactions and processes documented therein.

**Protection of company property and intellectual property**

Property and resources are treated appropriately and with care and are only used for company purposes and not for personal purposes, unless permission has been granted by the authorized party. We protect intellectual property appropriately against unauthorized access by third parties (e.. loss, theft or misuse) and respect and honor third-party intellectual property, such as patents, designs, images, trademarks, trade secrets and copyrights.

**Plagiarism**

We neither promote nor tolerate the use of plagiarized or counterfeit materials. We support the investigation and prosecution of activities in connection with counterfeit products.

**Product quality and product safety**

The conformity and safety of our products are a high priority for us. We comply with the applicable legal provisions regarding product safety, product integrity and product labeling.





# SOCIAL RESPONSIBILITY

**Universally valid ethical values and principles, in particular integrity, honesty and human dignity, determine our daily actions.**

### **Principle**

Our company is guided by the United Nations Universal Declaration of Human Rights and the core labor standards of the International Labor Organization (ILO).

We treat company employees and business partners with dignity and respect. It is important to us that our daily actions are always carried out in accordance with and in compliance with internationally recognized human rights.

### **Human rights and ethical behavior**

We respect and observe the principles and rights contained in the United Nations Universal Declaration of Human Rights and actively promote their observance and implementation. In our daily actions, we are guided by universally accepted ethical values and principles, in particular integrity, honesty and human dignity – we treat all people with respect.

This also includes the prohibition of any action or omission contrary to duty which is directly capable of impairing a protected legal position in a particularly serious and whose unlawfulness is obvious when all the circumstances in question are reasonably assessed.

### **Protection of the integrity**

We ensure that employees in our are not subjected to corporal punishment, torture or other physical, sexual, psychological or verbal humiliation, harassment or abuse.

### **Freedom of expression**

The basis of mutual trust and cooperation is an open and constructive dialog and interaction characterized by mutual respect. We guarantee the right to freedom of opinion and expression.

### **Privacy**

The right to privacy and the personal rights of the individual are respected.

### **Non-discrimination, diversity, inclusion, women's rights**

We treat all employees equally, in particular regardless of gender or gender identity, marital status, age, skin color, other physical characteristics, culture, national and ethnic origin, sexual identity, disability, political opinion, health status, religious affiliation, ideology or other characteristics of employees that are irrelevant to employment. We do not accept discrimination, for example in the recruitment or promotion process, remuneration or in the provision of training and further education measures. We take appropriate measures to prevent discriminatory behavior and respect women's rights and gender equality in the workplace. Diversity and inclusion should be part of holistic, fair social progress. We want to help ensure that diversity is lived and experienced positively by everyone and that all people are equally represented.



### **Health and safety at work, protection against contamination**

We attach great importance to a safe and healthy working environment. By establishing and applying appropriate safety standards, occupational safety systems and processes, we take the necessary precautions against accidents and damage to health that may arise in connection with our work. Appropriate measures are taken to prevent excessive physical or mental fatigue and relevant hazards from noise, pollution and odor. In addition, employees are regularly informed and trained on measures and rules of conduct as part of occupational health and safety. The minimum requirements for a safe and healthy working environment include the provision of safe and suitable work equipment and workplaces, clean drinking water, proper lighting, an appropriate room temperature, good ventilation and sanitary facilities.

We comply with the applicable national and international regulations for the protection of health and safety in the workplace and have established processes to identify and avoid risks.

### **Prohibition of forced labor and slavery**

We have a zero-tolerance policy towards any form of forced labor, slave labor or work of a similar nature, modern slavery, servitude or peonage and any form of human trafficking and other forms of exploitation. The same applies to debt or contract bondage or involuntary or exploitative prison labor. All work is voluntary and is not directly or indirectly coerced through violence intimidation. Employees are free to terminate their employment with the employer in compliance with the agreed or legal regulations. Practices such as withholding.

The confiscation of personal property, wages, passports, educational certificates, employment or other documents for inappropriate reasons is not accepted. Furthermore, there is no unacceptable treatment

of workers, such as psychological hardship, violence, coercion, sexual harassment and humiliation.

### **Ban on child labor**

We adhere to the minimum standards of the ILO conventions on the employment of children and young people and the prohibition of child labor and reject all forms of exploitation and the worst forms of child labor. We take measures to prevent the unlawful recruitment and employment of children under the minimum age. The minimum age for admission to employment must not be below the age at which compulsory schooling ends in the place of employment and in no case below 15 years of age. National standards for the protection of children and young people in employment are complied with (the exceptions to the relevant ILO conventions apply). Children and adolescents must not be exposed to any work that is harmful to their health, safety or morals due to its nature or the circumstances in which it is carried out.

### **Appropriate wages, working hours and other benefits, no unequal treatment in employment**

We provide our employees with their working conditions in documented form.

The working hours (including overtime) of our employees are based on the applicable working time laws. We respect our employees' right to sufficient rest, breaks, time off and leisure time to balance their professional and private lives.

We promote and support the development and qualification of our employees by providing appropriate opportunities for further training and education.

We guarantee performance-related and appropriate remuneration that at least corresponds to the respective statutory minimum wage. If there are no statutory minimum wages, we ensure that the wages paid cover the basic requirements of the employees, taking into account other attributable circumstances (e.g. part-time employment, additional income). The principle of equal treatment is also observed in the context of remuneration.

We inform our employees about the composition of their remuneration as part of a clear, detailed and regular statement. Remuneration is paid regularly, punctually and in full at a specific time.

### **Freedom of association, freedom of association and collective rights**

All employees have the right to form, join and participate in independent and free trade unions. This includes the right to strike and the right to collective bargaining. Employees who are active in this way are not discriminated against or subjected to reprisals and retaliatory measures.

### **Rights of minorities and indigenous peoples and communities in need of protection, land use**

We respect, promote and protect the rights of the local communities in which we operate, the rights of indigenous people and other vulnerable and disadvantaged groups.

We do not carry out unlawful forced evictions and do not seize land, forests or waters whose use secures people's livelihoods against legitimate rights. The prior, voluntary and informed consent of the respective authorized persons is required.

We see it as a matter of course to consult land users about intended business activities and to pay appropriate compensation for any land use granted. This also includes listening to the concerns of those

affected and achieving positive results for them through local engagement.

### **Use of security personnel**

When we employ third parties (private or public security forces) to protect our company, we ensure that the basic rights of our employees and other third parties are not violated. In particular, this means a ban on torture, cruel, inhuman or degrading treatment or injury to life or limb and respect for freedom of association and freedom of association.

### **No illegal employment**

We comply with the applicable legal regulations to combat illegal employment in its various forms, e.g. illegal hiring out of employees, violation of social security and tax obligations, legal regulations regarding the employment of foreign employees and official reporting obligations.



# ECOLOGICAL RESPONSIBILITY

## **We are aware of our responsibility to conserve natural resources.**

### **Principle**

We formulate clear strategies, goals and guidelines for environmental protection and implement these as part of an environmental management system in accordance with established standards. We continuously examine the ecological impact of our business activities along the entire value chain for the purpose of reduction and avoidance.

### **Natural resources and Biodiversity**

We preserve and protect natural resources through the efficient and resource-conserving use of energy sources, water, forests, soil and raw materials in particular. We comply with the applicable environmental standards and laws, use environmentally friendly and energy-efficient technologies and give preference to recycled materials.

### **Protection of ecosystems, deforestation and land use**

We are aware of our responsibility to continuously review and, where possible, avoid environmental pollution and hazards, negative effects on biodiversity and climate change in order to protect the natural basis of life. This applies in particular to harmful changes to natural ecosystems, such as those caused by soil change, water pollution, light and noise emissions, air pollution, excessive water consumption, damage to natural forests, deforestation or land and water use.

Our aim is to continuously improve environmental protection in our own area of influence.

### **Handling waste and hazardous substances**

We take a systematic approach to handling waste in order to avoid, handle, collect, store, dispose

of or recycle it in a responsible and environmentally friendly manner. We comply with the statutory regulations on the shipment, import, export, disposal and recycling of waste.

In order to avoid environmental pollution, we use hazardous substances, chemicals or other materials that could pose a risk if released into the environment in accordance with legal regulations and carefully and sparingly. When handling, transporting, storing, using, recycling or reusing and disposing of these substances, we observe the relevant regulations for maintaining safety.

We take our responsibility in terms of the Minamata Convention (protection of health and the environment from anthropogenic emissions and the release of mercury and mercury compounds into the air, water and soil), the Stockholm Convention (protection of human health and the environment from persistent organic chemicals), and the Stockholm Convention (protection of human health and the environment from persistent organic chemicals seriously -PoP „s), the Basel Convention (control of transboundary movements of hazardous waste and their disposal) and other legal regulations on waste shipments and observe the prohibitions described therein. We comply with our corresponding labeling requirements and our information obligations, also in accordance with the REACH Regulation, the RoHS Directive and other applicable chemicals legislation.

### **Animal welfare**

We observe the valid and applicable laws on animal protection and animal testing.

## Climate protection

Climate protection is an essential core element of our business policy. We actively pursue and support a sustainability strategy to decarbonize and reduce the impact of our business activities on climate change and to promote the circular economy and the application of corresponding practices.

## Avoidance of emissions

We actively pursue the goal of reducing greenhouse gas (GHG) emissions caused directly and indirectly by our operating processes and in our value chains.

## Responsible procurement of raw materials

We are aware of our responsibility for the direct or indirect procurement of critical materials and minerals from conflict areas and the applicable laws and regulations in this regard. These minerals include „conflict“ minerals, in particular tin, tungsten, tantalum and gold, rare earths and other minerals or metals (e.. bauxite, cobalt, titanium, lithium).

## Compliance with the Code of Conduct

We have implemented a due diligence process to ensure compliance with the principles and requirements set out in this Code of Conduct. This is intended to identify and assess human rights and environmental risks and establish appropriate measures.

We actively align our business and procurement activities with these principles and minimum standards and also address them to a reasonable extent in our own supply chains (e.g. by developing a code of conduct for suppliers). Our employees are informed and trained accordingly and are encouraged to comply.

## Complaints options

We provide various communication channels as part of an appropriate complaints procedure (whistleblo-

wer protection system / whistleblowing). This can be used to report (possible) violations of the environmental and human rights-related obligations set out in this Code of Conduct or other unlawful behavior.

Such a notification can be made in particular

- via the Pöppelmann whistleblower system: <https://poeppeppmann.integrityline.app/>,
- by e-mail: [compliance@poeppeppmann.com](mailto:compliance@poeppeppmann.com),
- by post to: Pöppelmann GmbH & Co. KG Kunststoffwerk-Werkzeugbau, personally for the attention of the Compliance Officer, Bakumer Str. 73, 49393 Lohne, Germany
- by telephone or in person to the Compliance Officer (contact details can be found in the publications on the website and the intranet (PPin-side) or by calling +49 4442- 9820.

Reporting persons have no fear of retaliation or sanctions. All reports of violations and misconduct will be treated in strict confidence and processed immediately.

We have drawn up a procedural instruction on the complaints procedure. This is publicly available on our website [www.poeppeppmann.com](http://www.poeppeppmann.com) and contains further information, including the reporting options.

If you have any further questions about the Code of Conduct, please contact [compliance@poeppeppmann.com](mailto:compliance@poeppeppmann.com) turn.