

Code of Conduct

Coating Products OHZ e.K. is committed to ecologically and socially responsible corporate management. We expect the same behaviour from all our suppliers and business partners. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into our corporate culture. We also strive to continuously optimise our business activities and our products and services in terms of sustainability and ask our suppliers and business partners to contribute to this in the sense of a holistic approach.

This Code of Conduct is aimed at all employees, business partners and suppliers of Coating Products OHZ e.K. .

It serves to guide all those involved regarding behaviour in relation to their own work, dealings with customers, business partners and government agencies, as well as towards employees, society and the environment.

It is also intended to strengthen trust and a sense of community between employees, with business partners and suppliers, ensure employee satisfaction and protect against legal risks.

The Code of Conduct is based on national laws and regulations such as the Act On Corporate Due Diligence in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG), international conventions such as the UN Civil Pact and the UN Social Pact, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, and the international labour standards of the International Labour Organization.

Coating Products OHZ e.K. is committed to compliance with the Code of Conduct and expects the same from all employees, business partners and suppliers.

We expect our suppliers to present this Code of Conduct to their subcontractors and to endeavour to contractually oblige them to comply with the listed standards and regulations.

This agreement comes into force upon signing. A breach of this Code of Conduct may ultimately be reason and cause for us to terminate the business relationship.

If you have any questions or uncertainties regarding the Code of Conduct, please contact Coating Products OHZ e.K.

Social responsibility

- **Occupational safety and health protection**

We undertake to take all necessary measures to ensure the health and safety of our employees at all times.

Necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the work. Appropriate measures must be taken to prevent excessive physical or mental fatigue. Employees are provided with access to sufficient quantities of drinking water and access to clean sanitary facilities.

- **Remuneration, working time**

All employees receive fair wages that correspond at least to the national statutory minimum wage or the minimum standards customary in the industry. Sufficient holiday leave is granted. Any overtime is compensated by time off or payment. The legal requirements regarding working hours are complied with.

- **Compliance with human rights, ban on forced and child labour**

We undertake to comply with internationally agreed human rights.

No forced labour, slave labour or comparable work may be used. All labour must be voluntary and without threat of punishment. Employees must be able to terminate their work or employment relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual harassment and humiliation. The hiring or use of security guards must be prohibited if persons are treated in an inhumane or degrading manner or are injured during their deployment or if freedom of association is impaired.

Child labour must not be used at any stage of production. We call on our suppliers and business partners to comply with the recommendation from the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be less than the age at which compulsory education ends according to the law of the place of employment and in any case not less than 15 years. If children are found at work, the measures to be taken to remedy the situation and enable the children to attend school must be documented. Young workers under the age of 18 may not be employed for work that is harmful to the health, safety or morals of children. Special protective regulations must be observed.

- **Equal treatment and equal opportunities, prohibition of discrimination**

Unequal treatment of employees in any form is not permitted unless it is justified by the requirements of employment. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin colour, disability, health status, political conviction, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual must be respected.

- **Dealing with conflict minerals**

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company establishes processes in accordance with the Organisation for Economic Cooperation and Development (OECD) for due diligence to promote responsible supply chains for minerals from conflict-affected and high-risk areas and expects its suppliers to do the same. Smelters and refineries without appropriate, audited due diligence processes should be avoided.

Ethical business behaviour

- **Laws**

We are committed to complying with all currently applicable laws and regulations.

- **Fair competition**

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors. These regulations also prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their own prices and other resale conditions.

- **Confidentiality/data protection**

When collecting, storing, processing, transmitting and passing on personal information, the laws on data protection and information security and the official regulations must be observed.

- **Protection of intellectual property and trade secrets**

Intellectual property rights must be respected; technology and expertise must be transferred in such a way that intellectual property rights and customer information are protected.

- **Integrity, corruption, gifts**

The highest standards of integrity must be applied to all business activities.

We pursue a zero-tolerance policy against all forms of bribery, corruption, money laundering, extortion and embezzlement. We expect the same from our suppliers and business partners.

Nevertheless, it may happen that small gifts or invitations are offered between business partners. In this case, they may only be accepted if the gift is of reasonable value and, intended as a polite gesture, is in line with general business practice. It must not be possible for motives to be misunderstood. Outsiders must never be given the impression that the business partner is being influenced in his business decisions by the gift.

Environmental responsibility

- **Consumption of raw materials and natural resources**

The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by economising, by recycling or by reusing materials.

- **Dealing with energy consumption/efficiency**

Energy consumption must be monitored. Economic solutions must be found to improve energy efficiency and minimise energy consumption.

- **Handling of waste and hazardous substances**

Solid waste must be identified, handled, reduced and disposed of or recycled responsibly. The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989, as amended, must be observed. Chemicals or other materials that pose a risk if released into the environment must be identified and handled in such a way that safety is ensured when handling, transporting, storing, utilising, recycling or reusing and disposing of these substances.

- **Dealing with air emissions**

General emissions from operations (air and noise emissions) and greenhouse gas emissions must be standardised, routinely monitored, checked and, if necessary, treated before they are released. Exhaust gas cleaning systems must be monitored and cost-effective solutions must be found to minimise any emissions.

- **Treatment and discharge of industrial wastewater**

Wastewater from operational procedures, production processes and sanitary facilities must be standardised, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.