

# Code of Conduct Goletz GmbH



## CODE OF CONDUCT



## Foreword

Goletz GmbH is active in the field of plastics processing and their refinement. We build on more than 50 years of experience and are successfully established in the market. We are a competent partner for our customers and business partners. As a customer- and market-oriented company, we strive to underpin integrity, reliability and credibility with this Code of Conduct by establishing binding basic rules for behaviour both within the company and towards customers and business partners. At the same time, we would like to use this Code of Conduct to meet the constantly growing requirements in the area of corporate governance.

With the aim of being a reliable partner, the management of Goletz GmbH is guided by integrity, honesty, sustainability and transparency.

As an established supplier to industry, especially the automotive industry, we pursue a long-term, sustainable, comprehensive value enhancement strategy. We achieve our goals through, among other things, our high level of personal commitment, a strong team spirit, open communication, quality, innovation and the best possible customer orientation. In our dealings with our customers, suppliers, employees and other business partners, we feel bound by basic values and promises, which we have summarised in this Code of Conduct.

The Code is intended to provide a guideline for sustainable responsible action at Goletz GmbH. A morally, ethically and legally impeccable conduct of all employees is crucial for us. The code applies to all employees, temporary workers and external employees. Morally impeccable and righteous behaviour is the responsibility of each individual. If you have any questions or comments, please do not hesitate to contact us.

Kierspe, 5th April 2024



Michael Vedder



Dr. Rolf Danzebrink

**Goletz GmbH**

Management

## **1. We act honestly and fairly in our dealings with our customers, suppliers, competitors and other partners as well as in our dealings with each other.**

### **1.1.Principle for dealing with business partners and employees**

The focus of Goletz GmbH's business activities is on our business partners (in particular customers, sales partners and suppliers). The pillars of sustainable success are objective and comprehensible decisions as well as fair, respectful and reliable dealings with these business partners. This also applies to the way in which employees, who form the basis for Goletz GmbH's successful business, treat each other. It applies to employees at the same level as well as in their role as superiors towards their employees. Employees with personnel responsibility in particular have to live up to their role model function to a special degree.

### **1.2.Anti-discrimination**

Our approximately 130 employees are the basis for the sustainable success of Goletz GmbH. Goletz GmbH does not tolerate any form of discrimination or harassment in the working environment, be it, for example, on the basis of race, ethnic origin, gender, religion or ideology, disability, age, sexual identity, political stance or trade union activity.

### **1.3.Fair competition and compliance with competition and anti trust laws and regulations.**

Rules to protect fair competition are an essential part of a free market economy. To this end, almost all countries have enacted appropriate laws. In particular, they prohibit competitors from agreeing on prices, dividing up customer groups or production quantities. Price fixing in relation to sales intermediaries and the prohibition of abusing a dominant position are also the subject of these laws. Finally, merger control regulations also aim to prevent the emergence of market-dominant structures. Almost all legal systems devote special attention to prohibited agreements between market participants which have as their object the restriction of competition. In this context, success is not important. Even "informal" discussions, informal gentlemen's agreements or even concerted practices are not permissible if they are intended to agree on or implement a restriction of competition. For the reasons mentioned above, even the appearance of such conspiratorial activity must be avoided. In discussions with competitors, therefore, no confidential information, in particular about prices and imminent price changes or customer and supplier relationships, may be disclosed or even exchanged. All employees and managers must observe the legal requirements on competition and antitrust law in their activities.

### **1.4.Anti money laundering**

Goletz GmbH aims to maintain business relationships only with business partners whose business activities are in compliance with legal regulations and whose financial resources are of legitimate origin. Goletz GmbH does not support money laundering. Suspicious behaviour on the part of business partners must be reported to the offices mentioned in section 8. Anti-money laundering laws are to be followed by all employees. Employees are also

required to comply with applicable record-keeping and accounting requirements for cash and other transactions and contracts.

### **1.5.Trade Controls**

Goletz GmbH will comply with all export control and customs laws and regulations applicable in each country in which Goletz GmbH conducts business.

### **1.6.Rejection of child and forced labour**

Child labour and forced labour are prohibited. On the basis of the conventions of the International Labour Organisation (ILO), Goletz GmbH shall only employ workers who are at least 15 years of age. Goletz GmbH shall not employ any person to perform work or services under the threat of any penalty and for which he or she has not voluntarily made himself or herself available, i.e. forced labour within the meaning of Convention No. 29 of the International Labour Organisation (ILO) is prohibited.

## **2. We avoid conflicts of interest that may arise due to very close relationships with business partners, competitors and other persons or institutions outside Goletz GmbH.**

### **2.1.Potential conflicts of interest with business partners, competitors and other persons or institutions outside Goletz GmbH**

Conflicts of interest arising from very close relationships with business partners, competitors and other persons or institutions outside Goletz GmbH may damage the integrity, professionalism and reputation of Goletz GmbH. Therefore, potential conflicts of interest must be identified and avoided as early as possible.

### **2.2.Potential conflicts between the private interests of employees and the interests of Goletz GmbH**

The employees of Goletz GmbH are required to place their work performance in the service of Goletz GmbH. Secondary employment or professional advisory activities may not impair the interests of Goletz GmbH and require the prior written approval of a superior and the personnel department. Insofar as no impairment of the interests of Goletz GmbH is to be feared, such approval shall be granted. Honorary positions may be held provided that the interests of Goletz GmbH are not impaired as a result. This shall also apply to the exercise of official mandates in other companies that are not part of Goletz GmbH (e.g. supervisory board, advisory board, etc.). Separate remuneration for lecturing or teaching activities within the scope of professional activities for Goletz GmbH must be reported to a superior as well as the Human Resources Department and approved in writing.

### **2.3.Potential conflicts of interest between employees and suppliers and customers**

In order to be able to represent the interests of Goletz GmbH in an unbiased manner, all employees of Goletz GmbH are expected to maintain a neutral and conflict-free business relationship with customers and suppliers. This neutral attitude towards customers and suppliers is jeopardised if employees are directly or indirectly legally, financially or personally connected with a customer or supplier, in particular if there are capital shareholdings or other legal opportunities to exert influence on customers and suppliers. This does not apply to ownership of less than 0.5% of the shares in a corporation.

Therefore, employees of Goletz GmbH may not enter into or hold such participations or opportunities to exert influence as a matter of principle. Any existing shareholdings and opportunities to exert influence must be reported to the respective direct superiors and the Human Resources Department or one of the offices mentioned in section 8.

### **2.4.Relationships with competitors**

In the same way, as a matter of principle, no employee of Goletz GmbH may directly or indirectly hold an interest in a competitor or have any other legal means of influencing competitors whose products compete with products of Goletz GmbH. This does not apply to the ownership of less than 0.5% of the shares in a corporation. Employees of Goletz GmbH are also not permitted to provide services for a competitor. If a close relative of an employee performs services for a competitor, this should be reported to a superior. A person is a close relative for the purposes of this provision if the employee is married to the person, is related to the person in a direct line, is related by marriage or adoption, or is related to the person in a collateral line up to the second degree.

## **3. We do not tolerate any form of bribery or corruption or any other form of corruption. We do not grant business partners and other third parties inappropriate gifts, hospitality, benefits, entertainment or other advantages of any kind. We do not accept such advantages.**

### **3.1.Principle**

Goletz GmbH wins orders through the quality and price of its products and services.

### **3.2.No offering or granting of advantages**

No employee of Goletz GmbH may offer, promise or grant unlawful advantages to others in connection with business activities - directly or indirectly. No monetary payments or other benefits may be granted in order to influence decisions or obtain unlawful advantages. This applies in particular to public officials, but also to persons in the private sector. The term public official includes representatives or employees of public authorities and other public institutions as well as civil servants and employees of state-owned enterprises and public international organisations. It also means candidates for political office, official representatives and employees of a political party, and political parties themselves. Any offer, grant of an advantage, invitation or gift must

comply with the applicable laws, this Code of Conduct and other internal regulations of Goletz GmbH. Any appearance of dishonesty and impropriety must be avoided. Thus, no offers, promises, gratuities, invitations or gifts may be made if they can be understood as an attempt to influence a public official or bribe a business partner. This does not include customary (according to amount and circumstances) occasional gifts of symbolic value or invitations to dinners or events within reasonable limits, provided that local customs and applicable laws are observed. Any gifts or invitations to meals or events in excess of this must be refrained from.

### **3.3.No soliciting or accepting of benefits**

No employee of Goletz GmbH may use his or her official position to demand, accept or procure advantages for himself or herself, family members or other third parties or to have such advantages promised. This does not include customary (in terms of amount and circumstances) occasional gifts of symbolic value or invitations to meals or events within a reasonable framework, provided that local customs and the applicable laws are observed. No other benefits, gifts or invitations to meals or events may be accepted.

### **3.4. Donations**

Donations or other contributions to social or charitable institutions, but not to individuals, may be granted under certain conditions. The minimum requirement for donations from Goletz GmbH is that these institutions are entitled to issue officially recognised donation receipts. Donations without donation receipts are not permitted. No donations may be made to organisations that are damaging to the company's reputation. Donations must not give the appearance of possible influence. Such an appearance may arise, for example, if the recipient of the donation is very close to a business partner. Goletz GmbH does not make political donations (donations to politicians, political parties or political organisations). Donations are always organised and approved by the management. This donation regulation does not apply to the appropriate support of local sponsoring activities in the vicinity of our plant, for example the support of sports clubs or recognised organisations from the fields of disaster control, environmental protection and nature conservation, e.g. fire brigades.

## **4. We shall at all times observe the duty of confidentiality and discretion.**

### **4.1. Confidentiality**

Confidentiality must be maintained with regard to internal matters of Goletz GmbH. This applies in particular to planned projects, the internal organisation or production processes as well as the figures of internal and external reporting, as long as this information has not been made public. The obligation to maintain secrecy also exists beyond the end of the employment relationship. The duty of confidentiality must also be observed in the private sphere and when dealing with social networks.

## **4.2. Data protection and data security**

The integrity, availability and confidentiality of information are of great importance to Goletz GmbH. Every employee must be aware of the need for information security and act accordingly. The collection, processing and use of personal data must comply with the statutory provisions. All employees are required to actively participate in the prevention and combating of material and immaterial damage and to handle the information systems, the data stored and processed on them and all non-electronic information with care.

## **4.3. Insider rules**

Persons who have inside information relating to another company, e.g. a business partner, whose securities are admitted to trading on a stock exchange or on an organised market, may not trade in securities or financial instruments of such companies whose price depends directly or indirectly on the securities of these companies (insider securities). Insider information is concrete information about circumstances which are not publicly known, which relates to an issuer of insider securities and which, if it became publicly known, would be capable of significantly influencing the stock exchange or market price.

## **4.4. Protection of intellectual property and prevention of the marketing of counterfeit parts**

Goletz GmbH protects the intellectual property of customers and employees through appropriate technical and organisational measures. Internal regulations prevent counterfeit parts from being put into circulation. These regulations must also be guaranteed by suppliers.

## **5. We give priority to safety, environmental protection and health protection**

Goletz GmbH is committed to protecting our environment. In addition, safety in the workplace and the safety of our products are fundamental principles for Goletz GmbH. To ensure this, every employee shares responsibility for the protection of people and the environment in his or her working environment. Our employees must comply with the laws, regulations and internal guidelines on environmental protection and plant and occupational safety and work towards ensuring that other employees comply with them.

In particular:

- Employees shall act prudently and thus bear responsibility for ensuring that their own health and the health of others is not endangered; in particular, accidents or work-related illnesses shall be avoided and prevented.
- When planning plants and processes and when carrying out all other activities, the respective state of the art, occupational medicine and hygiene must be taken into account.
- The aspects of product and occupational safety as well as environmental protection must be strictly observed in the development, production, storage, transport, distribution and use of our products.



- Environmental pollution must be continuously reduced to an appropriate level.
- Drugs and alcohol: Drug and alcohol abuse pose a serious risk to the company, especially to the safety, health and productivity of our employees. We therefore do not tolerate the possession, consumption or procurement of drugs on company premises. The term "drugs" refers to legal substances that have an intoxicating effect, such as cannabis or substances that are prohibited. In particular, it is not tolerated for employees to be under the influence of drugs or alcohol during working hours. Exceptions must be approved by the management and may be granted, for example, for company-organised events.

## **6. This Code of Conduct forms the basis of our operational behaviour and must therefore be observed.**

This Code of Conduct forms the basis for all guidelines within Goletz GmbH. Every employee within Goletz GmbH is obliged to comply with the laws, regulations, the contents of this Code of Conduct as well as the guidelines supplementing this Code of Conduct that are relevant to him or her and to work towards compliance with them on the part of other employees. All employees of Goletz GmbH are expected not only to formally comply with this Code of Conduct, but rather to internalise its meaning and purpose and apply it accordingly in their daily business life. All employees are responsible for ensuring that the laws and internal company rules are observed. The respective superiors must ensure that the employees are informed about the laws and internal company rules that affect them and are supported in their application. In case of doubt, employees shall seek advice from their supervisor or from one of the bodies mentioned in section 8. 2.

## **7. If we believe or discover that the above rules are not being or have not been complied with by a manager or employee, we will not hesitate to report the matter.**

Every employee is required to report any identified violations of this Code of Conduct to one of the offices listed in section 8. This also applies to sufficiently concrete suspicions. In the event of identified or possible violations of the Code of Conduct, the responsible persons of Goletz GmbH shall do everything necessary to clarify the facts and to initiate the necessary consequences, which may lead to the termination of an employment or business relationship. Goletz GmbH always reserves the right to take further legal action. No employee who reports possible violations of the Code of Conduct in good faith need fear any disadvantages, even if the report turns out to be unfounded.



## 8. Complaints procedure | Whistleblowing and Contact person

The supplier is responsible for establishing an effective grievance mechanism at the facility level for individuals and communities that may be affected by negative impacts.

The following person is responsible for receiving information on possible violations of the Code of Conduct and are the contact persons for all questions relating to the basic rules of this Code of Conduct:

The Chief Compliance Officer: Ms Miriam Mürmann.

Notifications can be sent to the Compliance Officer by e-mail, telephone or in writing (also anonymously) in a sealed envelope (please mark "COMPLIANCE" on the envelope).

E-mail: [compliance@goletz-gmbh.de](mailto:compliance@goletz-gmbh.de)

Telephone number: +49 2359 914063

Address: Goletz GmbH  
Attn: Ms Miriam Mürmann  
Am Funkenhof 2  
58566 Kierspe

Attachment 1

Local limits for donations according to 3.4:

Germany EUR 5,000.00

Other countries EUR 1,000.00

<b>Change history</b>				
<b>Revision level</b>	<b>Revision date</b>	<b>Reason for change</b>	<b>Creator</b>	<b>Checked / Released</b>
A	07.04.2021	<u>Initial creation</u>	MJA	RDA/MVE
B	24.05.2023	Gender passage <u>removed</u>	MJA	RDA/MVE
C	05.04.2024	Point 5- drugs and Cannabis	RDA	RDA/MVE